

Local Plan Regulation 18

Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land

(October 2023)



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Foreword by Councillor Stephen Giles-Medhurst, Deputy Leader of the Council and Lead Member on the Local Plan and Infrastructure, Three Rivers District Council

Dear Fellow Residents,

In January I said we would be consulting you further on what we, the Council, considered is the right housing number on the right sites for Three Rivers. **That figure, we have concluded is 4,852 against the required government target of 11,466.** This public consultation asks you if you agree with that figure and this approach which fails to meet the government figure. If you do, then please respond saying so and if not, tell us why.

In December 2022 all Councillors unanimously agreed my proposal to bring forward a revised Local Plan that did not meet the target, which is now 11,466 new homes over the 18 years to 2041.

We have consulted residents three times on our proposed new policies that guide the type and nature of developments, and on housing sites proposed by landowners that had been assessed as being probably suitable for development. We ruled out 230 sites we did not even ask your views on!

Over 20,000 responses were received – so thank you. In our consultations we did not meet the government figure, even if every site was included, we would still be 1,318 short. I know many of you felt many sites were unacceptable given the harm they would cause to the Green Belt. With 76% of Three Rivers being Green Belt I am not surprised, but we are required in law to seek your views.

So, our new plan uses the Green Belt as a constraint and rules out putting forward sites independently rated higher than moderate harm - this becomes our “red line”. We have taken every Brownfield site – but this is only 988 new homes. We have included planning permissions, some granted on appeal. So, this new plan proposes, subject to your views, just a small percentage of Green Belt land that will provide some new homes for future Three Rivers’ generations but **protects 98% of our Green Belt.** It does mean 2,385 new homes on such sites (out of 4,852) but not the 9,000 it would mean if we were to meet the government target figure.

This plan also seeks to provide for new health facilities, schools and community infrastructure. Our proposed policies are seeking 40% of homes to be affordable, with 25% being ‘first homes’ and 75% being social rent. We are seeking to restrict the number of luxury 4+bed homes. We will require developments to meet climate change objectives.

I will be honest with you our plan is a risk. Once it’s finalised following, yes yet a further technical consultation probably next October, **we must submit it to a Government Inspector for approval at a Public Inquiry.** As it’s below the government housing figure, they might reject it, ask us to start again, or impose the higher figure and sites not in this consultation on Three Rivers. Developers can argue at the public Inquiry for their sites to be included. So do let us know about the most recent sites we have excluded in Question 3. **As we go to print the government has not changed any of the planning rules or the housing targets for Councils.**

Trying to get the lower housing figure backed by evidence that protects more of our Green Belt is a risk worth taking and I hope you will support it.

I am pleased that that our approach is backed by the Three Rivers Joint Residents’ Association representing 22 separate residents’ groups. Council officers and I have

engaged with the Joint Residents Association, and they have made valuable informed contributions to the process not only on sites, but the detailed policies and I thank them.

So please let us have your views.

Kind regards



Stephen Giles-Medhurst

Councillor Stephen Giles-Medhurst

How to Respond to this Consultation

We are interested to hear the views of everyone including residents, businesses, community groups and all other stakeholders. All comments received will contribute towards the new Local Plan that will be submitted to the Government.

This document and supporting documents can be viewed and downloaded from the Council's website at:

<https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan>

You can send representations in the following ways:

Online at: haveyoursay.threerivers.gov.uk/local-plan

By post to: Planning Policy, Three Rivers District Council, Three Rivers House, Northway, Rickmansworth, Herts, WD3 1RL

The consultation period starts on Friday 27 October 2023 and runs for a period of six weeks, ending at 11pm on Sunday 10 December 2023

Please note that Three Rivers will only consider comments by respondents who provide their full name and address. Your name, organisation and response will be made publicly available once we publish responses; any comments made in your response therefore cannot be treated as confidential (published comments will exclude your personal contact details).

Inappropriate, offensive or racist comments will not be accepted.

We cannot consider matters that are outside the boundaries of the planning process and are likely to be civil matters between parties. These include representations in relation to loss of property value, loss of view from property, private access rights, moral issues and restrictive covenants.

Decisions on sites will not solely be based upon how many responses of support or objection are received but will primarily be based on the impact of the development assessed against local and national policy and the requirements that a Local Plan must meet.

An updated sustainability appraisal working note has been prepared. This document appraises the environmental, social and economic implications of the sites and can also be viewed on the Council's website.

Notification of Future Consultations

If you would like your email address to be added to the Local Plan consultation database so that you are notified of future Local Plan consultations, please request this by emailing localplanconsult@threerivers.gov.uk including your full name and email address.

If you need this information in large print,
braille or another format call 01923
776611 Minicom 01923 727303

If you would like this information translated into another language please contact Three Rivers District Council on 01923 776611

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This information is also available on our website at www.threerivers.gov.uk

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1 Introduction

What is the role of the Local Plan?

- 1.1 The Government requires local planning authorities to draw up a Local Plan that will guide future decisions about how land will be used. This consists of policies and site allocations that are used in the determination of planning applications once the Plan has been adopted.
- 1.2 The new Local Plan will set out how much land should be provided to accommodate new homes and jobs that are needed within Three Rivers up to 2041, and where this should be located. It will consider the need for new homes and jobs alongside the need for associated infrastructure such as shops, community facilities, transport, open space, sport and recreation, health services, and education facilities. The Local Plan will also set out the policy framework which will be used to determine proposals for new development across the District.
- 1.3 The Government's objectives are set out in the National Planning Policy Framework (NPPF, 2023). The NPPF places Local Plans at the heart of the planning system, so it is important that they are prepared and kept up to date. It makes it clear that local authorities should:
- Apply a presumption in favour of sustainable development, which for plan-making means that:
- a) Plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects;
 - b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. The application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area... (Paragraph 11)
- 1.4 Footnote 7 in the NPPF sets out that the policies referred to in paragraph 11 are those in the Framework relating to: habitats sites and/or designated as Sites of Special Scientific Interest; land designated Green Belt, Local Green Space, an Area of Outstanding Natural Beauty (AONB)...
- 1.5 It is therefore clear that the Local Plan needs to balance meeting the development needs for the area with preserving land designated for protection such as Green Belt and AONB.
- 1.6 **Arriving at the Low Housing Growth and Green Belt Restraint Option**
- 1.7 In arriving at our preferred Low Housing Growth and Green Belt Restraint Option and the sites that are set out in this consultation, the Council has taken into consideration the following:

- The views arising from previous public consultation involving a range of stakeholders in the District including residents, businesses, statutory bodies, local groups, and individuals with interest in Three Rivers. Previous Local Plan consultations were:
 - Issues and Options & Call for Sites (2017)
 - Additional Call for Sites (2017)
 - Potential Sites Consultation (2018)
 - Preferred Policy Options and Sites for Potential Allocation Consultation (2021)
 - Additional Sites for Potential Allocation (2023)
 - Call for Brownfield Sites (2023)

Further details of these consultations are available on our [website](#).

- National planning policy requirements and other plans and strategies affecting the area.
- The long-term priorities for Three Rivers as defined by local people and main service providers in the area.
- The rigorous testing of options and alternatives primarily through a sustainability appraisal process, taking into account environmental, social, and economic impacts of choices.
- The Government's principles of sustainable development, whereby development helps to maintain high and stable levels of employment, achieves social progress which recognises the needs of everyone, provides effective protection of the environment and represents the prudent use of natural resources.
- The extensive research and technical studies known as the Evidence Base that the Council has compiled in order to understand the needs of the area and opportunities and constraints that exist.

1.8 To date the following studies have been completed to form the evidence base:

- Strategic Housing & Employment Land Availability Assessment (SHELAA)¹
- Urban Capacity Study
- Edge of Settlement/New Settlement Scoping Study
- South West Hertfordshire Local Housing Needs Assessment
- South West Hertfordshire Economic Study
- South West Hertfordshire Retail & Leisure Study
- Gypsy & Traveller Accommodation Assessment
- South West Hertfordshire Level 1 Strategic Flood Risk Assessment
- Three Rivers District Council Level 2 SFRA
- Hertfordshire Water Study
- Heritage Impact Assessments
- Landscape Sensitivity Assessments
- Open Space, Sport & Recreation Study
- Three Rivers District Council & Watford Borough Council Green Belt Review Strategic Analysis (Stage 1)
- Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough Council
- Three Rivers District Council Green Belt Study Stage 3: New Settlement Analysis

¹ Including the SHELAA Addendum and updated site assessment proformas.

The Evidence Base can be viewed at:

<https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan#Evidence%20base>

Sustainability Appraisal

- 1.9 Sustainable development is the key principle underpinning the Three Rivers new Local Plan and is critical to the delivery of many of the Council's and community's aspirations. It requires social progress which recognises the needs of everyone, effective protection of the environment, prudent use of natural resources and the maintenance of stable levels of economic growth and employment.
- 1.10 The Local Plan has been subject to a Sustainability Appraisal (incorporating Strategic Environmental Assessment) at each stage of production to assess the options and inform the plan preparation and decision making process. The full Sustainability Appraisal² and Strategic Environmental Assessments are available on our website and on the consultation portal. Comments on the Sustainability Appraisal are welcomed.

Strategic Housing and Employment Land Availability Assessment

- 1.11 A key piece of technical evidence underpinning the Local Plan is the Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA provides an assessment of land supply in the District, helping to ensure that sufficient land is identified for new housing and employment uses across the plan period, now 2023 to 2041, and informs decisions on potential site allocations. It is, however, a technical piece of evidence work and does not in itself allocate sites for development. This is the role of the Local Plan. As such, the SHELAA is not part of the consultation itself but provides evidence underpinning the Council's decisions on which sites to consider for allocation.
- 1.12 The sites included in the SHELAA assessments have been put forward by land owners and site promoters where the sites are available for development. The Council can only include available sites in the Local Plan.
- 1.13 The identification of potential development sites within the SHELAA as deliverable does not mean the Council will grant planning permission for development. All planning applications will continue to be considered against the appropriate policies in the Local Plan and any other material considerations.
- 1.14 The SHELAA was completed in 2020 informing the Regulation 18 Part 1 Preferred Policy Options and Part 2 Sites for Potential Allocation consultation (2021). An addendum to the SHELAA was produced in support of the Regulation 18 Part 3 Additional Sites for Potential Allocation consultation (2023).

² Including additional Sustainability Appraisal Working Notes as we continue to consider options and alternatives.

- 1.15 New SHELAA site assessment proformas have been completed for newly submitted sites and updated site assessment proformas have been produced where new information has been included or where there have been site boundary changes.
- 1.16 The SHELAA report and site assessments can be viewed on the [evidence base page](#) on the Council's website.

Scope of this consultation

- 1.17 The Council undertook a Regulation 18 consultation in the summer of 2021. This was presented in two parts. Part 1: Preferred Policy Options and Part 2: Sites for Potential Allocation.
- 1.18 In early 2023 the Council undertook an additional Regulation 18 consultation on sites that had been submitted following the 2021 Parts 1 and 2 Regulation 18 consultation. This document was Part 3 of the Local Plan Regulation 18 consultation and set out additional potential sites where development could take place, how much additional development may take place, and when. All the additional sites identified as having potential for allocation were for residential development and associated infrastructure.
- 1.19 This consultation is the Part 4 Regulation 18 consultation. The focus is specifically on residential development, considering potential growth options and setting out the potential housing sites and associated infrastructure to meet the Council's preferred 'Low Growth' option. As such the focus of the consultation will be on residential development and associated infrastructure.
- 1.20 Please refer to Part 2 (2021) and Part 3 (2023) of the consultation for the previously recommended sites for housing as well as the following land uses: gypsy and traveller and travelling showpeople accommodation, employment (including Leavesden Studios), town centre and retail development, open space, and education. Part 2 of the consultation also included the proposed revision of the Green Belt boundary in relation to Bedmond. The responses to Part 2 and Part 3 have been collated and considered in preparing this consultation. Responses to all of the different Parts of Regulation 18 consultation, including this consultation, will be considered in preparing the Regulation 19 draft Local Plan.
- 1.21 Part 1 of the Regulation 18 consultation asked for views on the Council's preferred policy options that will guide future development. We have considered the responses to this part of the consultation and have been updating the Local Plan policies based on comments received as well as taking on board changes to national policy and regulations. The updated policies will be presented as part of the Regulation 19 stage draft Local Plan. The minutes of the Local Plan Sub-Committee meetings where these policies have been considered can be viewed on the Council's website at:
<https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan>
- 1.22 This is not the final stage of the Plan as we are still awaiting some key pieces of evidence, including the Infrastructure Delivery Plan, Strategic Transport Modelling, and Whole Plan Viability Assessment as well as updates to the Local Housing Needs Assessment and

Economic Study. Your views submitted as part of this consultation will help inform the Regulation 19 stage of the plan. The Regulation 19 document is the final draft of the Local Plan that is proposed to be submitted to the Secretary of State.

- 1.23 Following submission to the Secretary of State, there will be an examination by an independent Inspector before the Council can adopt the new Local Plan³. During the Local Plan examination, the Inspector will consider whether the draft Local Plan meets the tests of legal soundness. A key part of this is whether the plan meets national policy and legislation. The Inspector may find the plan unsound in which case the Council will have to go back to the beginning of the process. The Inspector may pause the examination and ask the Council to find more sites if they feel the Council is not adequately meeting its development needs. They may also suggest particular sites be added back in to the plan to help meet needs.
- 1.24 Maps including the sites considered suitable for potential allocation as well as those that were considered unsuitable by the Council can be viewed in the appendices to this document.

³ Details of the timetable are set out in the Local Development Scheme at:
<https://www.threerivers.gov.uk/services/planning/planning-policy/local-development-scheme>

PART 4: THREE RIVERS' PREFERRED LOCAL PLAN LOWER HOUSING GROWTH OPTION – PROTECTING MORE GREEN BELT LAND

2 Housing Growth

- 2.1 All growth in the District must maintain or improve the quality of life of Three Rivers' communities, and future development must secure a balanced provision between homes and jobs that also safeguards and enhances the environment, maintains the Green Belt, secures good services and facilities for all and achieves a sustainable transport system.
- 2.2 With a growing population, an ageing population and future changes in household make-up, the need for housing within Three Rivers continues to be high. New development is an important responsibility that we have in order to help ensure that future generations can find homes of their own.
- 2.3 As a Council, we acknowledge that there is an acute housing crisis in much of the UK and in particular in high-cost areas like Three Rivers. There is a pressing need for more homes, especially affordable homes, so young people are not forced to move away from the area. However, we also acknowledge that this cannot be addressed at the cost of harming existing communities and resulting in unacceptable harm to the Green Belt.
- 2.4 The sites identified as potential site allocations for housing have been arrived at following extensive technical work and evidence gathering. Subsequently, and in line with national planning policy, these sites are considered to be the most appropriate in having the potential for housing development⁴ and associated infrastructure.
- 2.5 It should be noted from the outset that if any of the potential housing sites for allocation are later found to no longer be suitable for allocation following this consultation, then the Council may need to identify other sites to contribute towards meeting its housing need.
- 2.6 The Part 1 Regulation 18 consultation (2021) set out the plan period that the Local Plan will cover and the number of dwellings required to meet its objectively assessed needs. The Housing Target at the time for the Local Plan was 12,624 dwellings over a 20 year plan period, based on the Government's standard method for calculating housing need. Once completions, commitments (active planning permissions), and a windfall allowance (expected development on sites not allocated in the plan) were taken into account, this resulted in a residual Housing Target of 10,678 dwellings.
- 2.7 The Part 2 Regulation 18 consultation identified sites that could deliver 8,973 dwellings. This was 1,705 dwellings short of the Government's residual Housing Target. The additional sites included in the Part 3 Additional Sites for Potential Allocation consultation identified sites for a further 825 dwellings. It should be noted that there was a 438 dwelling reduction to this figure as 9 sites were removed from the Part 2 document following site owners' withdrawal or statutory bodies' objections and a further three sites' dwelling capacities were reduced

⁴ Appendix 1 provides a summary of the sites that were included in the SHELAA addendum which are not being taken forward

prior to the Part 3 consultation. This left a deficit of 1,318 dwellings on the Government target.

- 2.8 Since undertaking the Part 1 and Part 2 Regulation 18 consultations in 2021 the Council has re-calculated its housing target using the Government's standard method. The new Local Plan is anticipated to be adopted in 2026 in accordance with the Local Development Scheme (December 2022); national policy requires that a Local Plan should plan for a 15 year period following adoption. The new Local Plan period will therefore be 2023 – 2041.
- 2.9 Using the current year of 2023 as the starting point, and with adoption of the Local Plan expected in 2026, the Local Plan period would be 18 years as we need to plan for 15 years post adoption. The standard method target for Three Rivers is currently 637 dwellings per annum which equates to a requirement of 11,466 dwellings over the 18 year plan period.
- 2.10 However, it should be noted there are a significant number of commitments that together with a windfall allowance can be deducted from this figure. As of 31 March 2023, there are 1,089 commitments and a windfall allowance of 390 over the Local Plan period, giving a total of 1,479 dwellings that can be taken from the overall 11,466 dwellings housing target. This gives a residual housing target of 9,987 dwellings or 555 dwellings per annum across the plan period.
- 2.11 **National planning policy and guidance requires that the District meets objectively assessed needs for housing (OAN) as calculated by the Government's standard method**, including any unmet needs from neighbouring authorities where it is practical to do so and is consistent with achieving sustainable development. Councils should identify needs in their area and respond positively to wider opportunities for growth.
- 2.12 The Council considers the housing target as calculated using the Government's standard method to be too high and is concerned that it is based on out of date data (2014 population projections) that does not represent the actual development needs for the area. However, we acknowledge that the exceptional circumstances for using an alternative method to the standard method have not been met and as such the standard method housing target should be the starting point in establishing the right level of housing growth in the District.
- 2.13 The Government has consulted on reforms to the planning system, however at the time of writing no relevant changes have been made to national policy or guidance so we are still working within the same framework as before. The Government did not include a review of the standard method as part of its consultation but has stated it will review the standard method after the population projections are updated with the new census data in 2024.
- 2.14 If any changes to national policy and the standard method come into force the Council will need to consider its position and potentially amend the plan accordingly.

Brownfield First

- 2.15 Prior to considering the release of any Green Belt land in order to meet the development needs of the District we have focussed on brownfield sites first. We have completed an Urban Capacity study as part of the evidence base for the Local Plan and have conducted

two 'Brownfield Call for Sites' encouraging developers and land owners to come forward with potential brownfield sites.

- 2.16 We will seek to maximise the delivery of housing within the built-up urban area, including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land.
- 2.17 The urban brownfield sites can only provide land to accommodate 988 dwellings, therefore some Green Belt release will be required in order for the Council to meet the development needs of the area.

Green Belt as a Constraint

- 2.18 Over three quarters (76%) of the District is designated as Green Belt with the remainder of the District made up by the existing urban area consisting of small and medium sized settlements distributed fairly evenly.
- 2.19 The NPPF sets out that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation and updating of Local Plans. The Council's Local Housing Needs Assessment (2020) analyses the needs for different types and tenures of housing, highlighting an acute need for affordable housing across the District. This need, together with the needs for future generations, accommodation for the elderly and the delivery of much needed infrastructure, is considered to constitute the exceptional circumstances required for alteration of Green Belt boundaries.
- 2.20 The National Planning Policy Framework (NPPF) sets out that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses unless policies in the Framework that protect areas of particular importance provide a strong reason not to. An example provided in Footnote 7 of the NPPF of one of these policies is land designated as Green Belt. As such, the Council considers the avoidance of unacceptable harm to Green Belt a key consideration when establishing the level of housing to be delivered through the Local Plan.
- 2.21 The Council has therefore agreed an evidence based approach using the Stage 2 Green Belt Review as the basis for considering the level of harm caused by potentially releasing areas of Green Belt land for development. The Council has reviewed the potential sites included in the Part 2 and Part 3 Regulation 18 consultations as well as any newly submitted sites in this context.
- 2.22 The Stage 2 Green Belt Review can be viewed on the [evidence base page](#) on the Council's website. It assesses the performance of parcels of land against the five purposes of the Green Belt as set out in the National Planning Policy Framework, and how the openness of the Green Belt and the strength of its boundaries would be affected by the removal of land from the Green Belt for development.

- 2.23 The five purposes set out in the National Planning Policy Framework are as follows:
- a) To check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.24 Other issues such as landscape quality, biodiversity and wildlife, quality of agricultural land are separate considerations that will have been considered as part of the site assessment process but is outside of the remit of the Green Belt review.
- 2.25 In considering Green Belt sites, the Council agreed sites that fell into areas of low to moderate Green Belt harm as assessed in the Stage 2 Green Belt Review (see Figure 1 below), subject to the sites being considered suitable for development when assessed against other policies and constraints in the Strategic Housing and Employment Land Availability Assessment (SHELAA). Strategic Green Belt sites of circa 500 dwellings or more that fell into areas of 'Moderate-High' or 'High' Green Belt harm were then considered, weighing up the benefits the site could provide in terms of sustainability and infrastructure provision against the harm of removing the site from the Green Belt for development. Any sites that fell within areas of 'Very High' harm we considered unsuitable. Please see Figure 1 for a summary of the approach.

2.26 **Figure 1: Consideration of harm to the Green Belt**

Harm Rating	6-point scale ranging from Very High to Low
Very High	Not considered acceptable for residential development
High	Development may be considered acceptable for strategic sites, in very sustainable locations, that deliver infrastructure and considerable community benefits
Moderate-High	Development may be considered acceptable for strategic sites in sustainable locations that deliver infrastructure and community benefits
Moderate	All sites considered
Low-Moderate	All sites considered
Low	All sites considered

- 2.27 All of the Green Belt sites for C3 residential development within this consultation are in areas of 'Low' to 'Moderate' Green Belt harm. None of the strategic sites falling into areas of higher Green Belt harm were deemed to be providing benefits that outweighed the harm to the Green Belt, so only those that fell within areas of 'Low' to 'Moderate' Green Belt harm (or just the section of the site that fell within these areas) have been included in this consultation.
- It is on this basis that the Council is protecting the most valuable areas of Green Belt, with 98% of the District's Green Belt remaining protected.**

- 2.28 The Green Belt sites agreed for consultation equate to 2,385 dwellings across the plan period.

Question 1: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved.

Question 2: Please explain your answer.

3 Alternative Growth Options

- 3.1 In preparing the Local Plan the Council has considered alternative growth options. As part of the Issues and Options Consultation in 2017 the Council considered growth options based around its Objectively Assessed Need⁵ (OAN) which at the time was 514 dwellings per annum. The consultation considered three growth options. These were 'Low Growth' of 411 dwellings per annum (20% below OAN), 'Moderate Growth' of 514 dwellings per annum (OAN) and 'High Growth' of 617 dwellings per annum (20% above OAN). 18% of respondents supported the low growth option, 41% supported moderate growth and 41% supported high growth. It should be noted that these options were considered prior to looking at the effects of constraints such as Green Belt on the ability of the plan to deliver these levels of growth.
- 3.2 The standard method housing target of 637 dwellings is considered to be the equivalent of the 'High Growth' option. The Part 2 and Part 3 consultations are considered to have addressed the 'High Growth' option although the Council acknowledges that it was unable to find enough suitable sites to fully meet the standard method target in full. The Council has also considered whether a higher growth option than the standard method would be appropriate, however as it was unable to fully meet the standard method this option has not been pursued.
- 3.3 Following these consultations and consideration of issues this consultation is a 'Low Growth' option and results in 270 dwellings per annum across the 18 year plan period. This 'Low Growth' option has been reached by using a Green Belt constraint led approach where the valuable areas of Green Belt remain protected but some lower harm areas of Green Belt are proposed to be released in order to help meet the development needs of the area as much as possible.
- 3.4 An Option of no Green Belt release would only have resulted in 988 new dwellings on brownfield sites and as the majority of the sites were small sites this was considered not only unviable in meeting infrastructure needs but was considered likely to be found unsound by the Government Inspector under current national planning policy. For this reason, this option has not been pursued.
- 3.5 A 'Moderate Growth' option was also considered by the Council equating to 415 dwellings per annum. This option, as above, included a number of strategic sites that were rated

⁵ This was prior to the introduction of the Government's standard method for calculating housing need. The OAN used in the 2017 Issues & Options consultation was calculated as part of the Strategic Housing Market Assessment prepared by independent consultants in 2016.

'moderate-high' or 'high' harm on the basis that the benefits they could deliver in terms of meeting the District's development needs, delivering sustainable patterns of development, and infrastructure provision could outweigh the harm of removing these sites from the Green Belt. The Council felt that this approach would result in unacceptable harm to the Green Belt, and as such the 'Low Growth' option was selected as the preferred approach.

3.6 Table 1 Low Growth- Green Belt restraint / protection Option

Site Type	Dwellings
Brownfield Sites	988
Green Belt Sites	2,385
Commitments (active / granted planning permissions)	1,089
Permitted windfall allowance	390
Total	4,852

3.7 Table 2 Comparison of considered Growth Options

Growth Option	Standard Method Option	Standard Method Option	High Growth Option	Low Growth Option
Reg. 18 stage	At Part 1&2 Consultation	At Part 3 Consultation	After Part 3 Consultation	At Part 4 Consultation
Plan Period	2018-2038	2018-2038	2023-2041	2023-2041
Standard Method (dwellings per annum)	630	630	637	637
Required Housing Target	12,624	12,624	11,466	11,466
Total dwellings found through potential allocations, commitments and windfall	10,919	11,306	10,839	4,852
Allocations per annum	546	565	602	270
Shortfall to target	1,705	1,318	627	6,614

Question 3: Do you agree that the Council's preferred 'Low Growth and Green Belt Restraint' option is the best growth strategy for the District?

Question 4: Please explain your answer.

3.8 Please refer to the [Regulation 18 Part 2 Sites for Potential Allocation](#) document to view the proposed policy on housing allocations.

3.9 The potential housing site allocations based on the 'Low Growth and Green Belt Restraint' approach, including both brownfield and Green Belt sites, are shown in site tables below for each settlement area, as listed below:

Abbots Langley & Leavesden Garston Bedmond Kings Langley Langleybury Chorleywood Maple Cross
--

Mill End Rickmansworth Croxley Green Carpenders Park South Oxhey Oxhey Hall
--

- 3.10 The site tables for the potential housing allocations include the following information:
- Site reference, name and map
 - Site size (ha)
 - Current use
 - Indicative dwelling capacity
 - Information on whether or not the site is located in the Green Belt and whether its allocation would require removal of the site from Green Belt
 - Anticipated phasing for development (1-5 years, 6-10 years, 11-15 years and 16 years plus⁶); this indicative timescale is based on ownership, physical limitations or constraints and the amount of time likely to be taken to develop the site in full.
 - Site specific requirements/measures
- 3.11 The comments section in the site tables set out site-specific requirements and/or measures that would need to be addressed in proposals for the sites. It should be noted that these are in addition to matters set out in the detailed preferred policy options set out in the Regulation 18 Part 1 consultation document, including requirements relating to affordable housing and sustainable transport provision and net gain in biodiversity value. The site specific requirements/measures are not exhaustive but seek to aid future considerations by identifying key constraints and considerations which are specific to sites. As stated, all future proposals would need to comply with the full suite of policies in the Local Plan.
- 3.12 The site tables for the 50 potential housing allocations are shown below.
- 3.13 Appendix 1 provides a summary of the sites not proposed for development by TRDC since the Regulation 18 Part Three: Additional Sites for Potential Allocation consultation. These are not included in the consultation following evaluation by officers and decisions by Members. It was deemed that all these sites were unsuitable for development for a number of reasons relating to each site. The Strategic Housing & Employment Land Availability Assessment (SHELAA) site assessments for these sites together with those proposed for potential allocation can be viewed on the [evidence base page](#) of the website.
- 3.14 The Sites not taken forward in the Regulation 18 Part Two: Sites for Potential Allocation consultation in 2021 can be viewed at: <https://cdn.threerivers.gov.uk/files/2023/01/67c617a0-9e6e-11ed-8d80-6dc425ce7e94-appendix-2-sites-not-taken-forward-compressed.pdf> and the sites not taken forward in the Regulation 18 Part Three: Additional Sites for Potential Allocation consultation can be viewed at: <https://cdn.threerivers.gov.uk/files/2023/03/c3fe1070-ceeda-11ed-8ef9-5d849f65f7b4-appendix-1-sites-not-being-taken-forward-regulation-18-additional-sites-doc.pdf>. These sites

⁶ This relates to the number of years following adoption of the Local Plan as set out in the Council's Local Development Scheme <https://www.threerivers.gov.uk/services/planning/planning-policy/local-development-scheme>

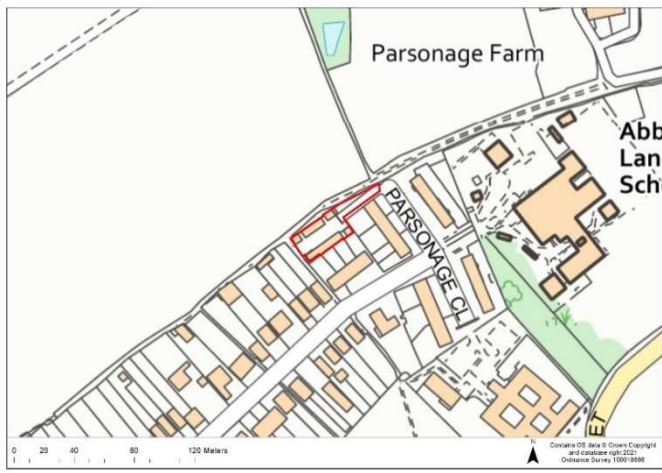
have already been included in previous Regulation 18 consultations and therefore are not included in Appendix 1.

Question 5: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development?

Question 6: Please explain your answer.

4 Abbots Langley & Leavesden Potential Sites

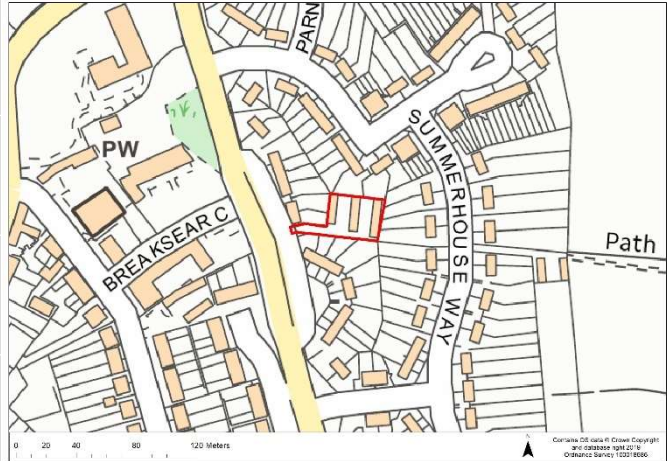
AB18: Garage Courts Parsonage Close

Site Ref.	AB18	Site	Garage Courts Parsonage Close	Size (ha)	0.09
				Current use	Garages
				Dwelling Capacity	7 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development of the site would need to take account of protected trees along the northern boundary of the site, as well as the public right of way which runs along the northern boundary.					

Question 7: Do you agree that site AB18 is an appropriate development site?


Question 8: Please explain your answer.

AB26: Garages Tibbs Hill Road

Site Ref.	AB26	Site	Garages Tibbs Hill Road	Size (ha)	0.1
				Current use	Garages
				Dwelling Capacity	7 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development of the site would need to protect heritage assets in the vicinity of the site.					

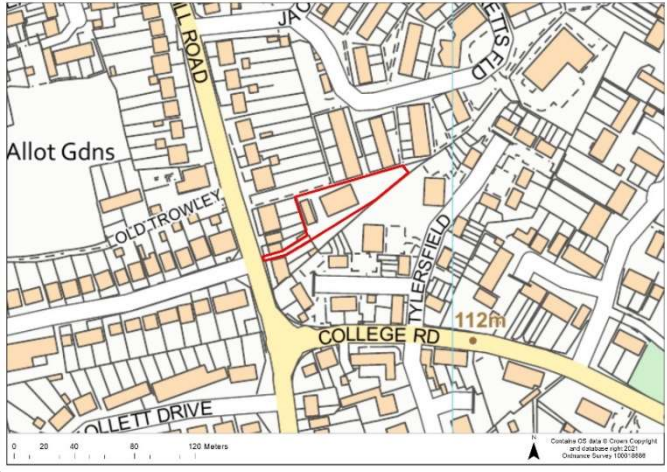
Question 9: Do you agree that site AB26 is an appropriate development site?
Question 10: Please explain your answer.

AB31: Garages Jacketts Field

Site Ref.	AB31	Site	Garages Jacketts Field	Size (ha)	0.08
				Current use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site.					


Question 11: Do you agree that site AB31 is an appropriate development site?
Question 12: Please explain your answer.

AB32: Yard off Tibbs Hill Road

Site Ref.	AB32	Site	Yard off Tibbs Hill Road	Size (ha)	0.16
				Current use	Builders yard
				Dwelling Capacity	10 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site.					

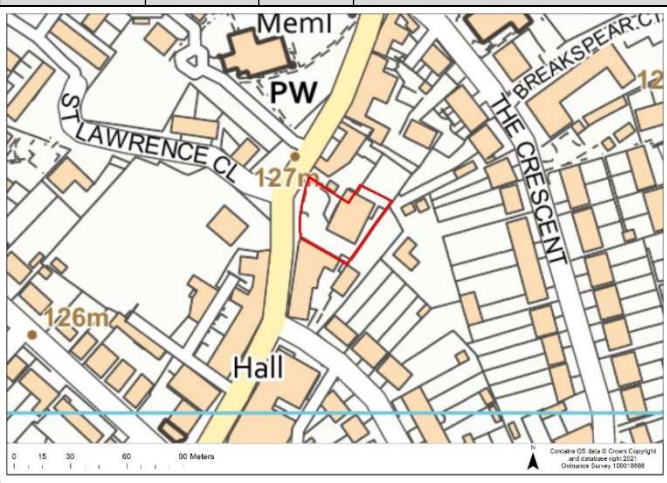
Question 13: Do you agree that site AB32 is an appropriate development site?
Question 14: Please explain your answer.

AB39: Garages Rosehill Gardens

Site Ref.	AB39	Site	Garages Rosehill Gardens	Size (ha)	0.08
				Current use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
Comments Any development would need take account of protected trees in/adjacent to the site and provide suitable mitigation to address surface water flood risk on areas of the site.					

Question 15: Do you agree that site AB39 is an appropriate development site?
Question 16: Please explain your answer.


H3: Pin Wei 35 High Street

Site Ref.	H3	Site	Pin Wei 35 High Street	Size (ha)	0.13
				Current use	Restaurant
				Dwelling Capacity	11 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector.					

Question 17: Do you agree that site H3 is an appropriate development site?

Question 18: Please explain your answer.

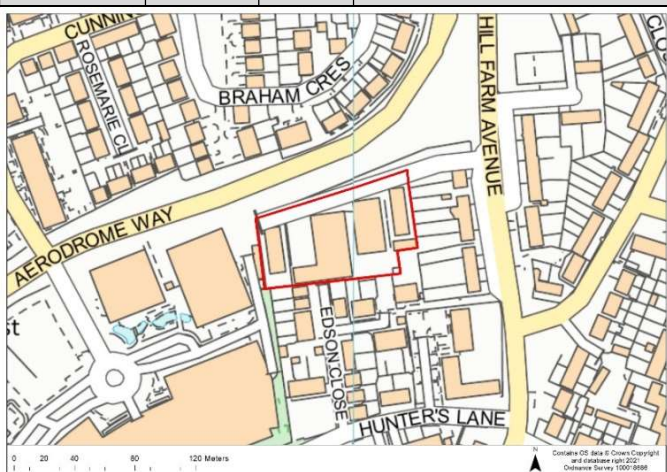
H4: Furtherfield Depot, Furtherfield

Site Ref.	H4	Site	Furtherfield Depot, Furtherfield	Size (ha)	0.53
				Current use	Depot / storage
				Dwelling Capacity	36 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. The area of public open space within the site boundary would require protection. The site would be required to provide open space and play space.					

Question 19: Do you agree that site H4 is an appropriate development site?

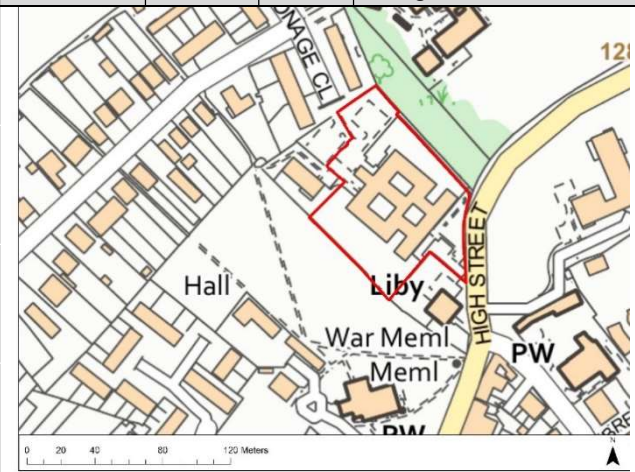
Question 20: Please explain your answer.

H6: Hill Farm Industrial Estate Leavesden

Site Ref.	H6	Site	Hill Farm Industrial Estate	Size (ha)	0.13
				Current use	Industrial
				Dwelling Capacity	38 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. The site would be required to provide open space and play space.					

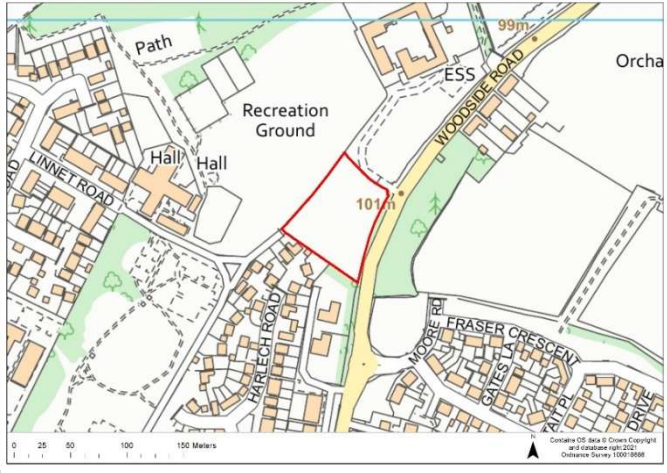
Question 21: Do you agree that site H6 is an appropriate development site?
Question 22: Please explain your answer.

NSS14: Margaret House, Abbots Langley

Site Ref.	NSS14	Site	Margaret House, Abbots Langley	Size (ha)	0.66
				Current use	Disused residential Care Home
				Dwelling Capacity	25 dwellings (net)
				Phasing	0-5 years
				Green belt	No. Brownfield site
Comments Development would need to take into consideration the heritage assets within the vicinity of the site, the presence of the adjacent Local Wildlife Site. There is existing vehicular access provision from Parsonage Close at the northern boundary of the site. HCC Highways state access needs further work, including on the suitability of Abbots Road.					


Question 23: Do you agree that site NSS14 is an appropriate development site?
Question 24: Please explain your answer.

CFS4: Land at Warren Court, Woodside Road

Site Ref.	CFS4	Site	Land at Warren Court, Woodside Road	Size (ha)	0.54
				Current use	Former private allotment land
				Dwelling Capacity	26 dwellings
				Phasing	1-5 years
				Green Belt	Yes - If allocated, the Green Belt boundary would have to be revised
Comments Any development would be required to take account of the presence of protected trees within the site. An archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets of archaeological interest.					

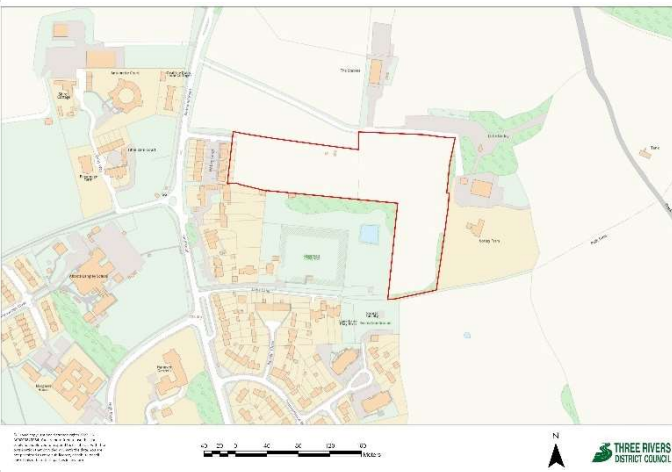
Question 25: Do you agree that site CFS4 is an appropriate development site?
Question 26: Please explain your answer.

CFS3: Land adjacent to Fraser Crescent and Woodside Road

Site Ref.	CFS3	Site	Land adjacent to Fraser Crescent and Woodside Road	Size (ha)	7.1
				Current use	Greenfield
				Dwelling Capacity	303 dwellings
				Phasing	1-10 years
				Green Belt	Yes - If allocated, the Green Belt boundary would have to be revised.
Comments <p>Any development would be required to take account of the presence of protected trees within the site and public rights of way through the site. Access to the site is expected to be via the already constructed Fraser Crescent / Woodside Road entrance. A detailed heritage impact assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets in the vicinity of the site. There is a sewer to the west of the site which would need to be protected as part of any development. Upgrades to the wastewater network would likely be required if the site were to be developed. The site would be required to provide open space and play space. The site is adjacent to an allocated school site in the adopted 2014 Local Plan.</p>					


Question 27: Do you agree that site CFS3 is an appropriate development site?
Question 28: Please explain your answer.

CFS6: Land at Mansion House Equestrian Centre

Site Ref.	CFS6	Site	Land at Mansion House Equestrian Centre	Size (ha)	2.8
				Current use	Grazing land
				Dwelling Capacity	133 dwellings
				Phasing	1-10 years
				Green Belt	Yes - If allocated, the Green Belt boundary would have to be revised.
Comments <p>Site could come forward together with adjacent site PCS21 Land at Love Lane. Access would come through existing new development on the menage at Notley Court. Any development of the site would need to take account the public right of way adjacent to the site boundary. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. The site would be required to provide open space and play space.</p>					

Question 29: Do you agree that site CFS6 is an appropriate development site?
Question 30: Please explain your answer.

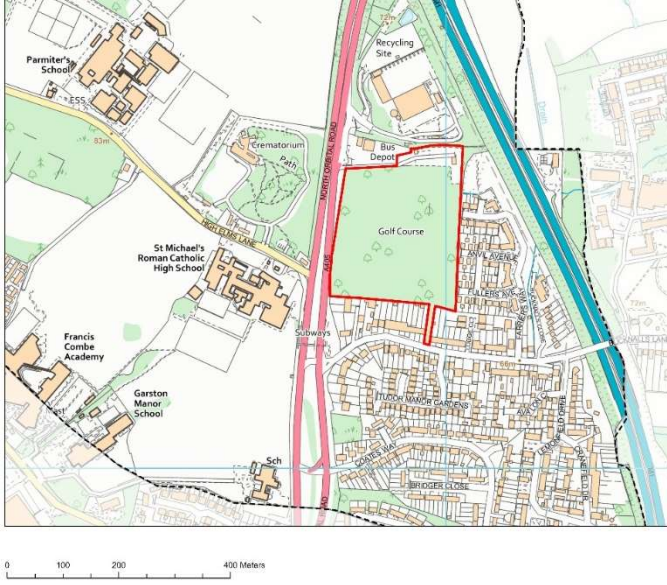
PCS21: Land at Love Lane

Site Ref.	PCS21	Site	Land at Love Lane	Size (ha)	1.3
				Current use	Open grassland
				Dwelling Capacity	62 dwellings
				Phasing	1-5 years
				Green Belt	Yes - If allocated, the Green Belt boundary would have to be revised.
Comments <p>Site could come forward together with adjacent site CFS6 Land at Mansion House Equestrian Centre to share access from Notley Court or have its own access via Love Lane. Any development of the site would need to take account the public right of way adjacent to the site boundary. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Suitable access arrangements would need to be achieved at the planning application stage. Upgrades to the wastewater network would likely be required if the site were to be developed. The site would be required to provide open space and play space.</p>					

Question 31: Do you agree that site PCS21 is an appropriate development site?
Question 32: Please explain your answer.

5 Garston Potential Sites

CFS65: Land north of Bucknalls Lane

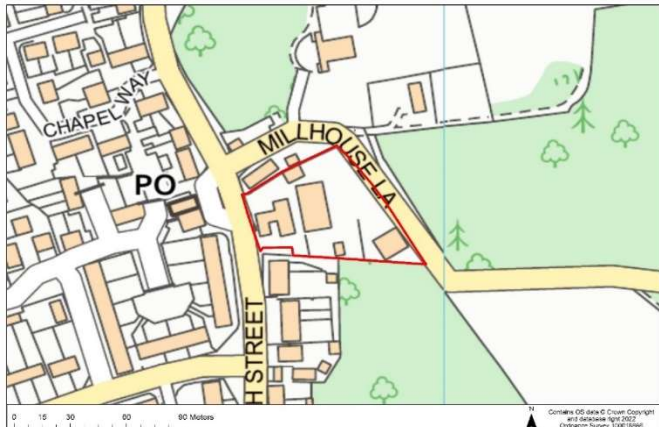
Site Ref.	CFS65	Site	Land north of Bucknalls Lane	Size (ha)	5.8 3.2 (accounting for 100m buffer)
				Current use	Former golf course
				Dwelling Capacity	144 dwellings
				Phasing	1-10 years
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.
Comments <p>An archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets of archaeological interest. Potential noise and air quality issues arising from the site's proximity to the A405 and M1 would need to be addressed as part of any development. Any development would be required to take account of the presence of protected trees within the site. A minimum 100m buffer distance between the nearest dwellings and the boundary of the Waterdale Household Waste Recycling Centre (located to the north) would be required as part of any development, which has reduced the developable area to approximately 4.2ha. The site would be required to provide open space and play space. Access would be required from the A405, with only pedestrian access considered acceptable from Bucknalls Lane.</p>					

Question 33: Do you agree that site CFS65 is an appropriate development site?

Question 34: Please explain your answer.

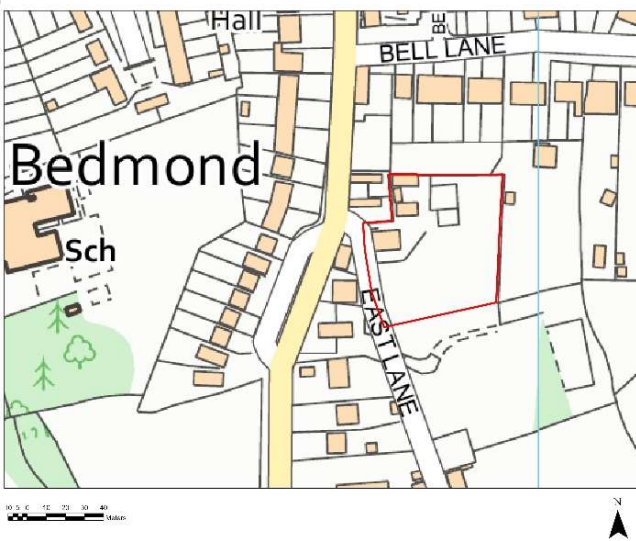
6 Bedmond Potential Sites

NSS2: 56 High Street, Bedmond

Site Ref.	NSS2	Site	56 High Street, Bedmond	Size (ha)	0.4
				Current use	Car dealership, MOT centre and service station
				Dwelling Capacity	20 dwellings
				Phasing	0-5 years
				Green Belt	Yes. Previously developed land in the Green belt
Comments <p>Suitable mitigation to address surface water flooding and ground water flooding would be required. Part of the site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. There are no heritage assets within the site boundary, although there are two Grade II Listed Buildings to the north and south of the site and Locally Listed Buildings located to the south, on High Street. A landscape visual assessment will be required in order to mitigate any potential adverse impacts.</p>					

Question 35: Do you agree that site NSS2 is an appropriate development site?
Question 36: Please explain your answer.


NSS6a: North Cott East Lane

Site Ref.	NSS6a	Site	North Cott East Lane	Size (ha)	0.47
				Current use	Grassland and existing buildings
				Dwelling Capacity	12 dwellings
				Phasing	0-5 years
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised. The site is partially within and partially adjacent to the village of Bedmond and the proposed inset area.
Comments Any development proposals on the site should be accompanied by a pre-application or pre-determination archaeological assessment. Suitable mitigation to address the risk of surface water flooding would be required to the east of the site. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. HCC Highways advise access from East Lane is not suitable for any development, an access solution would be needed before any consideration. It is also expected that enhanced crossing facilities of High Street would be needed. Development would also need to take into consideration the heritage assets within the vicinity of the site.					

Question 37: Do you agree that site NSS6a is an appropriate development site?
Question 38: Please explain your answer.

7 Kings Langley Potential Sites


NSS10: Land at Mill Place, Hunton Bridge

Site Ref.	NSS10	Site	Land at Mill Place, Watford Road, WD4 8QS	Size (ha)	0.6
				Current use	Storage
				Dwelling Capacity	20 dwellings
				Phasing	0-5 years
				Green Belt	Yes. Brownfield site so does not require green belt boundary revision.
Comments <p>An 8m buffer would be required as part of any development proposals between residential development and the site's proximity to the River Gade/ Grand Union Canal.</p> <p>Noise issues caused by the site's proximity to the A41 may have an impact on the site and its future occupiers and as such noise reduction measures should be considered as part of the design.</p> <p>A detailed heritage impact assessment may be required as part of any proposals, due to the proposals potential impact on Langleybury and The Grove, which contains a number of nationally Listed Buildings.</p>					

Question 39: Do you agree that Site NSS10 is an appropriate development site?

Question 40: Please explain your answer.


ACFS8b: Flower House 2-3 Station Road

Site Ref.	ACFS8b	Site	Flower House 2-3 Station Road	Size (ha)	0.4
				Current use	Retail
				Dwelling capacity	19
				Phasing	1-5 years
				Green belt	Yes. If allocated, the Green Belt boundary would have to be revised. Partly brownfield site
Comments A detailed heritage impact assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. The western boundary of the site is in Flood Zone 3b due to the main river which along the western boundary of the site; no development would be permitted on this part of the site and an 8 metre buffer between Flood Zone 3b and any development would be required. Any development of the site would need to take account of the potential noise issues arising from the site's proximity to the M25 and Kings Langley station as well as potential air quality issues due to proximity to the M25. Developed should focussed on the brownfield portion of the site, with the remainder of the site for amenity space and biodiversity net gain.					

Question 41: Do you agree that Site ACFS8b is an appropriate development site?
Question 42: Please explain your answer.

8 Langleybury Potential Sites

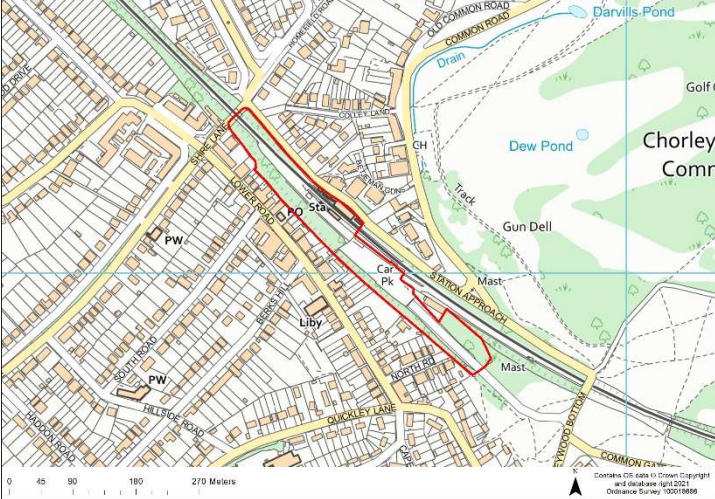
H7: Langleybury House/School

Site Ref.	H7	Site	Langleybury House/School	Size (ha)	1.97
				Current use	In use for filming, comprised of redundant school buildings
				Dwelling Capacity	25 dwellings
				Phasing	6-10 years
				Green belt	The site would remain in the Green Belt and the redundant school buildings are proposed for replacement with housing.
Comments <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector, and part of the Langleybury and Grove Development Brief (2012) area. As set out in the Langleybury and Grove Development Brief, it is intended that a change in the location of the existing built footprint of the former secondary school buildings would be replaced with new development. Any development will be delivered in line with the Langleybury and Grove Development Brief. The site would be required to provide open space and play space.</p>					

Question 43: Do you agree that Site H7 is an appropriate development site?
Question 44: Please explain your answer.

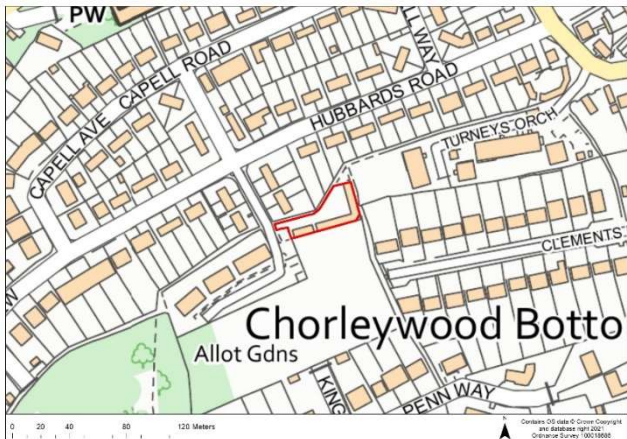
9 Chorleywood Potential Sites

CFS16: Land at Chorleywood Station

Site Ref.	CFS16	Site	Land at Chorleywood Station (station car park and adjoining land)	Size (ha):	2.3
				Current Use	Chorleywood station, car park and adjoining land
				Dwelling Capacity	190
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments <p>A detailed heritage impact assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets including the Conservation Areas. Any proposals would need to take account of protected trees within the site as well as providing suitable mitigation to address surface water flood risk in areas of the site. Potential noise and vibrations caused by the use of the station/railway line should be addressed through mitigation measures. Upgrades to the wastewater network would likely be required if the site were to be developed. The site would be required to provide open space and play space. Retention of the current pedestrian access through the site would be required.</p> <p>The station use would remain as part of any development and proposals would need to safeguard parking provision for the station.</p>					

Question 45: Do you agree that site CFS16 is an appropriate development site?
Question 46: Please explain your answer.


CW9: Garages at Copmans Wick

Site Ref.	CW9	Site	Garages at Copmans Wick	Size (ha):	0.1
				Current Use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any proposals would need to provide suitable mitigation to address surface water flood risk on areas of the site and ensure protection of the public right of way adjacent to the north of the site.					

Question 47: Do you agree that site CW9 is an appropriate development site?

Question 48: Please explain your answer.

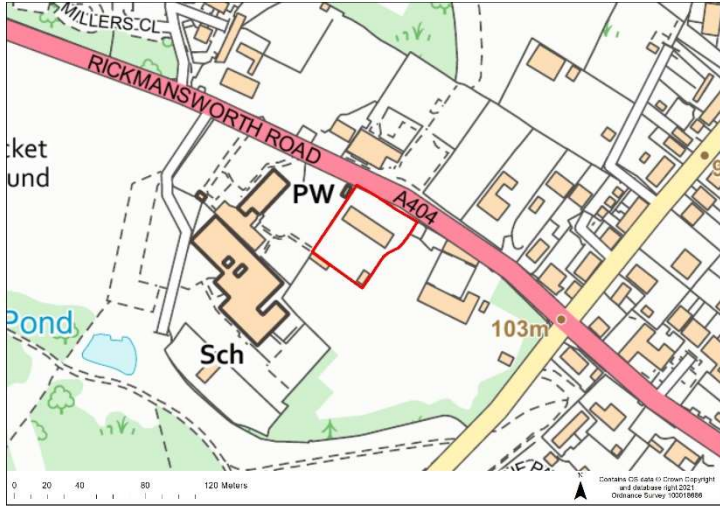
CFS18c: Hill Farm, Stag Lane

Site Ref.	CFS18c	Site	Hill Farm, Stag Lane	Size (ha):	0.75
				Current Use	Agricultural buildings
				Dwelling Capacity	38 dwellings
				Phasing	1-10 years
				Green Belt	Yes. If allocated, the Green Belt boundary may have to be revised. Partly brownfield site.
Comments The site is accessed from Stag Lane, as this is a narrow road with capacity for single-file traffic for most of its length and improvements would be necessary. Any proposals would need to take account of the public right of way within the site. The site would be required to provide open space and play space.					

Question 49: Do you agree that site CFS18c is an appropriate development site?

Question 50: Please explain your answer.

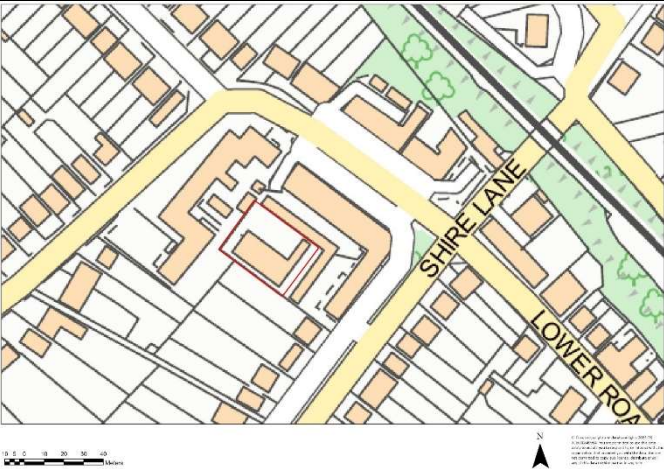
ACFS1: Heath House Rickmansworth Road

Site Ref.	ACFS1	Site	Heath House Rickmansworth Road	Size (ha):	0.2
				Current Use	Residential dwelling and garden
				Dwelling Capacity	10 dwellings
				Phasing	1-5 years
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised. Partly brownfield site.
Comments A detailed heritage impact assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Any proposals would need to provide suitable mitigation to address surface water flood risk on areas of the site.					

Question 51: Do you agree that site ACFS1 is an appropriate development site?

Question 52: Please explain your answer.

NSS23: Chorleywood Telephone Exchange Shire Lane

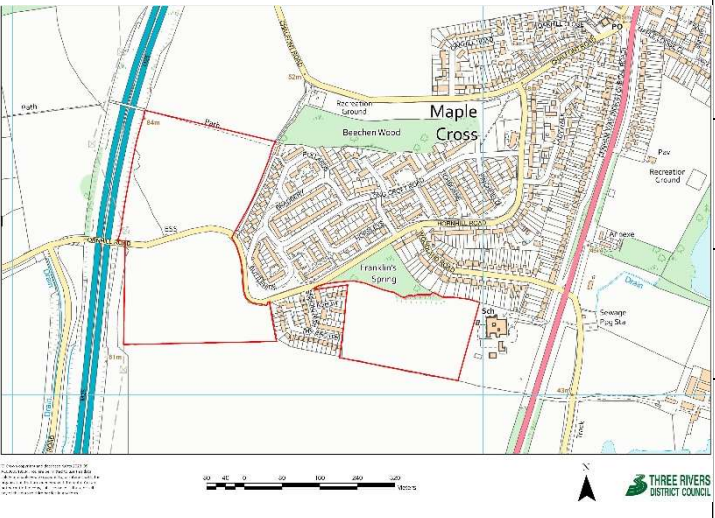
Site Ref.	NSS23	Site	Chorleywood Telephone Exchange Shire Lane	Size (ha):	0.11
				Current Use	Telephone exchange
				Dwelling Capacity	15 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments A detailed heritage impact assessment may be required as part of any proposals in order to protect and mitigate any potential adverse impacts to heritage assets.					

Question 53: Do you agree that site NSS23 is an appropriate development site?

Question 54: Please explain your answer.

10 Maple Cross Potential Sites

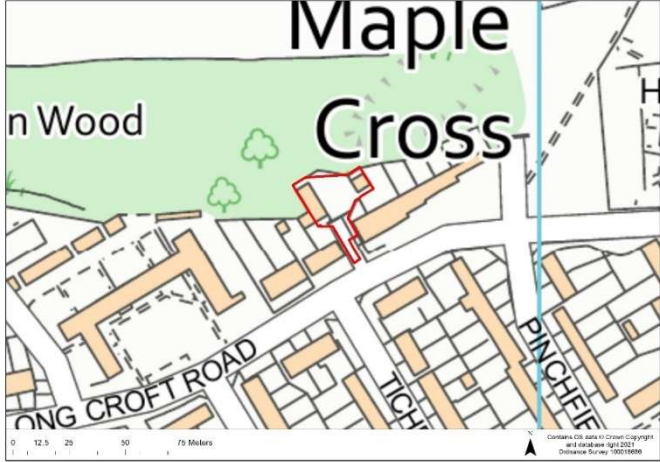
EOS12.4: Land west and south of Maple Cross

Site Ref.	EOS12.4	Site	Land west and south of Maple Cross	Size (ha):	17.18
				Current Use	Agricultural
				Dwelling Capacity	850 dwellings
				Phasing	1-15 years
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.
<p>Comments</p> <p>Reduced in scale from a larger site, effectively creating two sites that would be expected to come forward together. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Potential noise and air quality issues arising from the site's proximity to the M25 would also need to be addressed. Any proposals would need to take account of the presence of public rights of way within the site and protected trees adjacent to the site as well as providing suitable mitigation to address surface water flood risk and groundwater flood risk on areas of the site. Upgrades to the wastewater network would likely be required if the site were to be developed. The sites together are strategic in scale and would be required to provide primary education facilities (proposed as an extension to the existing Maple Cross JMI and Nursery School), a local centre (including local shops, community facilities, a nursery and flexible commercial space), a GP surgery, open space, play space and improvements to bus stops and an extended bus route through the sites. The provision of infrastructure may result in the number of houses being delivered reduced from the indicative dwelling capacity of 850 dwellings. All infrastructure provision must be legally secured prior to development commencing.</p>					

Question 55: Do you agree that site EOS12.4 is an appropriate development site?

Question 56: Please explain your answer.


MC11: Garages rear of Longcroft Road

Site Ref.	MC11	Site	Garages rear of Longcroft Road	Size (ha):	0.06
				Current Use	Garages
				Dwelling Capacity	5 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.					

Question 57: Do you agree that site MC11 is an appropriate development site?
Question 58: Please explain your answer.

11 Mill End Potential Sites


EOS7.0: Land to the south of Shepherds Lane and east of the M25

Site Ref.	EOS7.0	Site	Land to the south of Shepherds Lane and east of the M25	Size (ha):	20.8
				Current Use	Agricultural
				Dwelling Capacity	550 dwellings
				Phasing	6-15 years
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.
Comments <p>An archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets of archaeological interest. Potential noise and air quality issues arising from the site's proximity to the M25 would need to be addressed as part of any development. Development would need to take account of protected trees in the site and the public right of way adjacent to the site. Suitable mitigation to address surface water flood risk and groundwater flood risk on the site would also be required. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. The site would be required to provide a primary school and/or a health centre, open space and play space. Site capacity reduced from previously consulted on 760 dwellings in order to accommodate on site infrastructure provision and open space. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity prior to development of the site. All infrastructure provision must be legally secured prior to development commencing. Access with improvements is expected via Shepherds Lane, further work with the Highways authority will be required.</p>					

Question 59: Do you agree that site EOS7.0 is an appropriate development site?

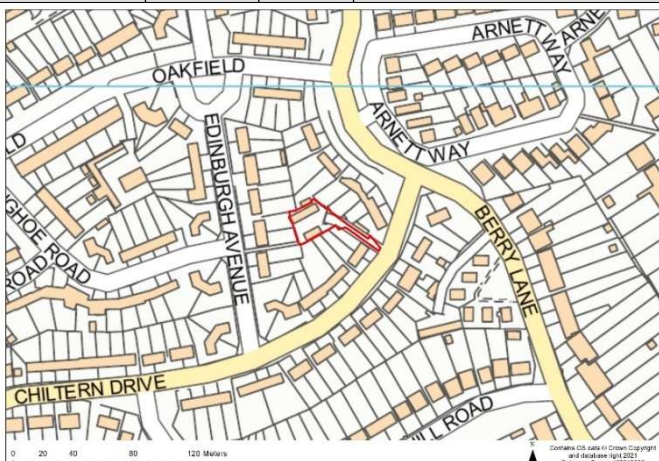
Question 60: Please explain your answer.

P4a: Quickwood Close Garages

Site Ref.	P4a	Site	Quickwood Close Garages	Size (ha):	0.16
				Current Use	Garages
				Dwelling Capacity	7 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Suitable mitigation to address surface water flood risk on the site would be required. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.					

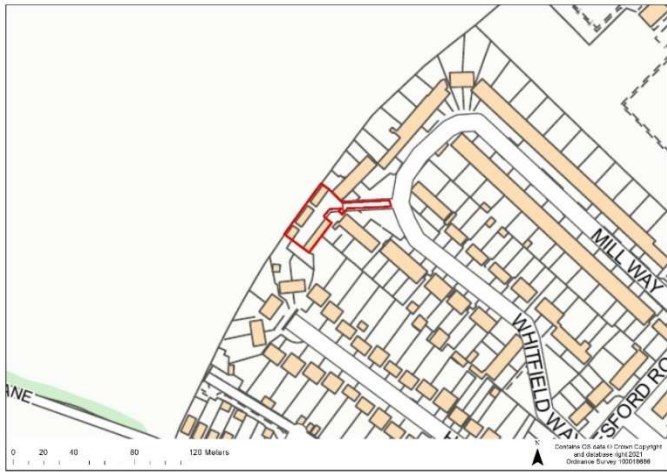
Question 61: Do you agree that site P4a is an appropriate development site?
Question 62: Please explain your answer.

P33: Chiltern Drive Garages

Site Ref.	P33	Site	Chiltern Drive Garages	Size (ha):	0.07
				Current Use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.					


Question 63: Do you agree that site P33 is an appropriate development site?
Question 64: Please explain your answer.

P38: Garages at Whitfield Way

Site Ref.	P38	Site	Garages at Whitfield Way	Size (ha):	0.09
				Current Use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.					

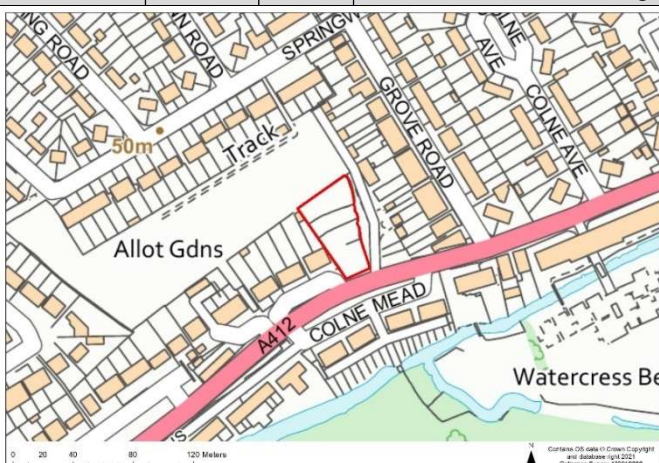
Question 65: Do you agree that site P38 is an appropriate development site?
Question 66: Please explain your answer.

P39: The Queens Drive Garages

Site Ref.	P39	Site	The Queens Drive Garages	Size (ha):	0.11
				Current Use	Garages
				Dwelling Capacity	7 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
Comments The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Potential noise and air quality issues arising from the site's proximity to the M25 would need to be addressed as part of any development.					


Question 67: Do you agree that site P39 is an appropriate development site?
Question 68: Please explain your answer.

RW31: Garden land off Uxbridge Road

Site Ref.	RW31	Site	Garden land off Uxbridge Road	Size (ha):	0.17
				Current Use	Garden land
				Dwelling Capacity	12 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Suitable mitigation to address surface water flood risk and groundwater flood risk on the site would be required. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.					

Question 69: Do you agree that site RW31 is an appropriate development site?
Question 70: Please explain your answer.

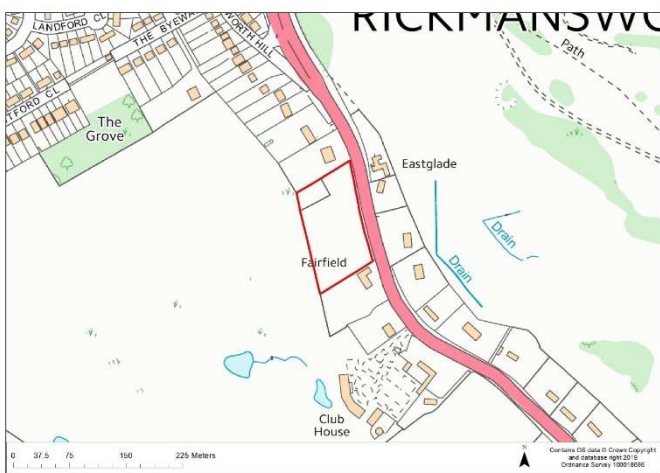
H15: Garages rear of Drillyard, West Way

Site Ref.	H15	Site	Garages rear of Drillyard, West Way	Size (ha):	0.22
				Current Use	Garages
				Dwelling Capacity	13 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
Comments The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. Any development would need to take account of protected trees within and adjacent to the site.					

Question 71: Do you agree that site H15 is an appropriate development site?
Question 72: Please explain your answer.

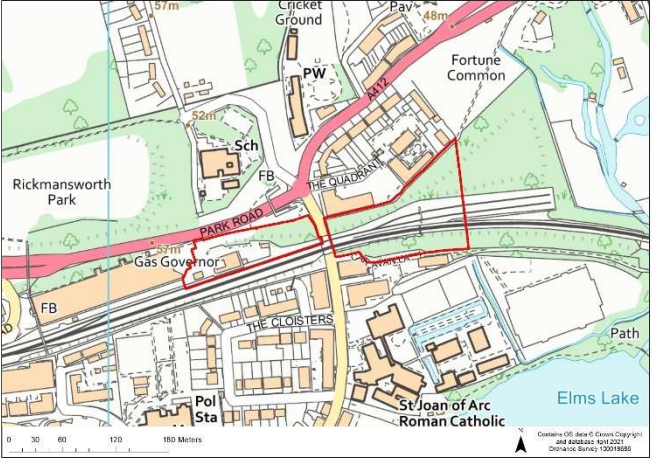
12 Rickmansworth Potential Sites

CFS59: Land on London Road

Site Ref.	CFS59	Site	Land on London Road	Size (ha):	1.1
				Current Use	Greenfield
				Dwelling Capacity	75 C2 care home bedrooms (equivalent to 40 dwellings)
				Phasing	1-10 years
				Green Belt	Yes. If allocated the Green Belt boundary would have to be revised.
Comments C2 housing is considered to be specialised and supported accommodation under the Draft Housing Mix policy. The provision of specialised and supported housing is a strategic objective of the Local Plan which the site would contribute to achieving. The site is partially in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.					

Question 73: Do you agree that site CFS59 is an appropriate development site?
Question 74: Please explain your answer.

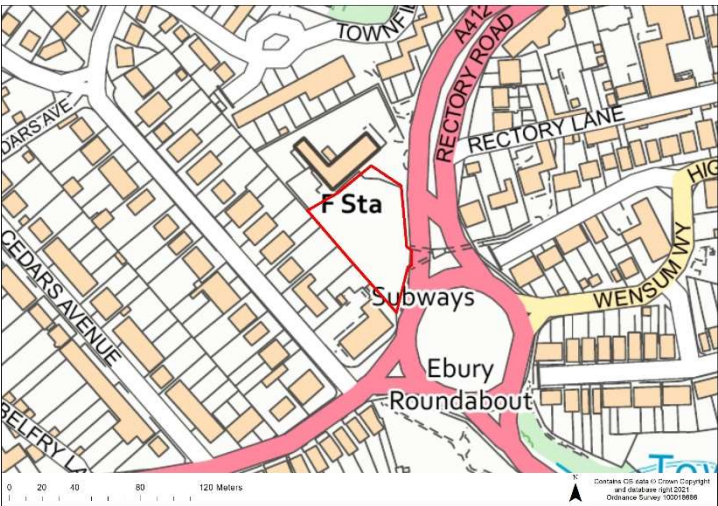
CFS40a: Land at Park Road

Site Ref.	CFS40a	Site	Land at Park Road	Size (ha):	1.8
				Current Use	Transport for London depot and car park, grassland/tree coverage
				Dwelling Capacity	112 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments <p>Any development would be required to provide suitable mitigation to address surface water flood risk and groundwater flood risk in the site. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Potential noise and vibrations caused by the use of the railway line should be addressed through mitigation measures. Development would also need to account of protected trees in the site. The site would be required to provide open space and play space.</p>					

Question 75: Do you agree that site CFS40a is an appropriate development site?

Question 76: Please explain your answer.

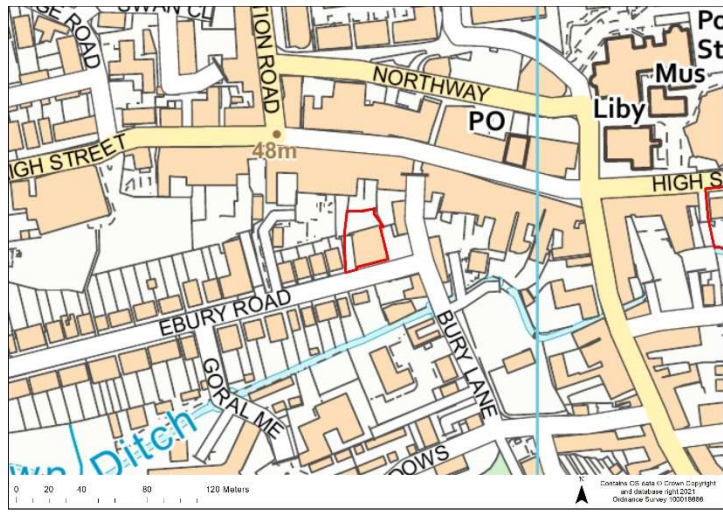
H17: Former Police Station Rectory Road

Site Ref.	H17	Site	Former Police Station Rectory Road	Size (ha):	0.29
				Current Use	Storage
				Dwelling Capacity	24 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. Suitable mitigation to address surface water flood risk and groundwater flood risk on the site would be required. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A detailed heritage impact assessment would also be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. The site would be required to provide open space and play space.</p>					

Question 77: Do you agree that site H17 is an appropriate development site?

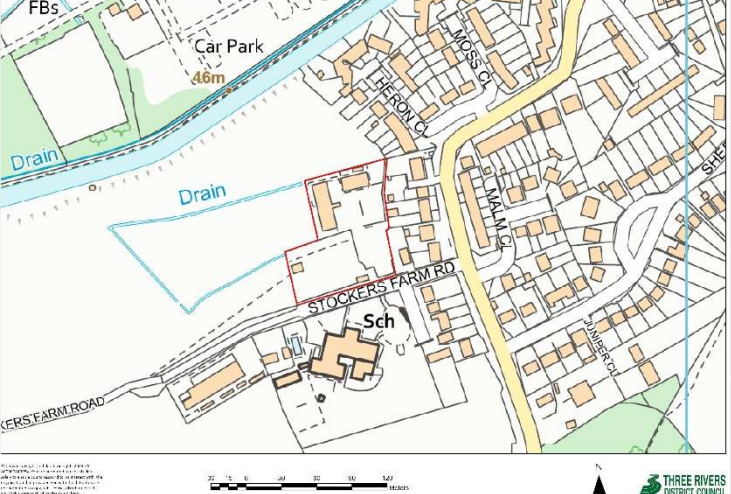
Question 78: Please explain your answer.

H18: Royal British Legion Ebury Road

Site Ref.	H18	Site	Royal British Legion Ebury Road	Size (ha):	0.08
				Current Use	Royal British Legion Hall
				Dwelling Capacity	6 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. Suitable mitigation to address groundwater flood risk on the site would be required. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A detailed heritage impact assessment would also be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets.</p>					

Question 79: Do you agree that site H18 is an appropriate development site?
Question 80: Please explain your answer.

H22a: Depot Stockers Farm Road

Site Ref.	H22a	Site	Depot, Stockers Farm Road	Size (ha):	0.76
				Current Use	Affinity Water depot
				Dwelling Capacity	60 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
<p>Comments</p> <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. H22a is a boundary update to exclude the Local Wildlife Site from the site boundary. Suitable mitigation to address surface water flood risk and groundwater flood risk on the site would be required. A detailed heritage impact assessment would also be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. The public right of way running through the south-western part of the site would require protection. The site would be required to provide open space and play space.</p>					

Question 81: Do you agree that site H22a is an appropriate development site?

Question 82: Please explain your answer.

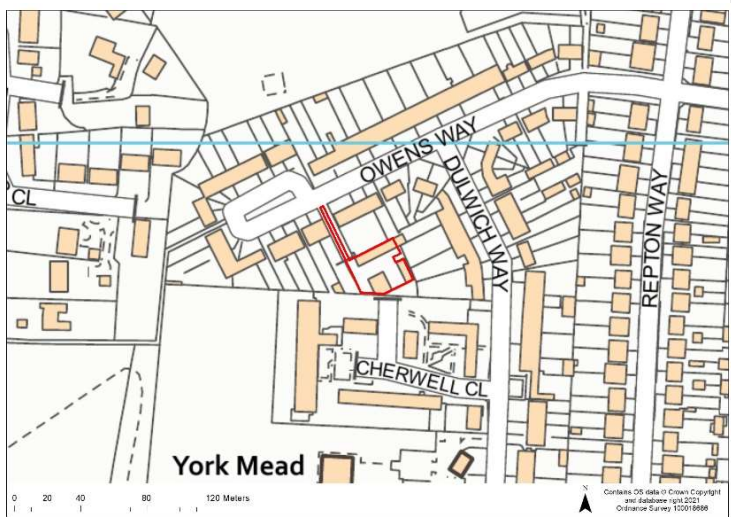
13

CFS20: Land at Croxley Station Watford Road

Site Ref.	CFS20	Site	Land at Croxley Station Watford Road	Size (ha):	2.3
				Current Use	Station, station car park & timber yard
				Dwelling Capacity	163 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
<p>Comments</p> <p>The southern area of the site is an existing housing allocation in the Site Allocations LDD (adopted 2014) (Site H13). Any development would be required to provide suitable mitigation to address surface water flood risk. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Potential noise and vibrations caused by the use of the station/railway line would need to be addressed through mitigation measures. The site would be required to provide open space and play space. The station use would remain as part of any development and proposals would need to safeguard parking provision for the station.</p>					

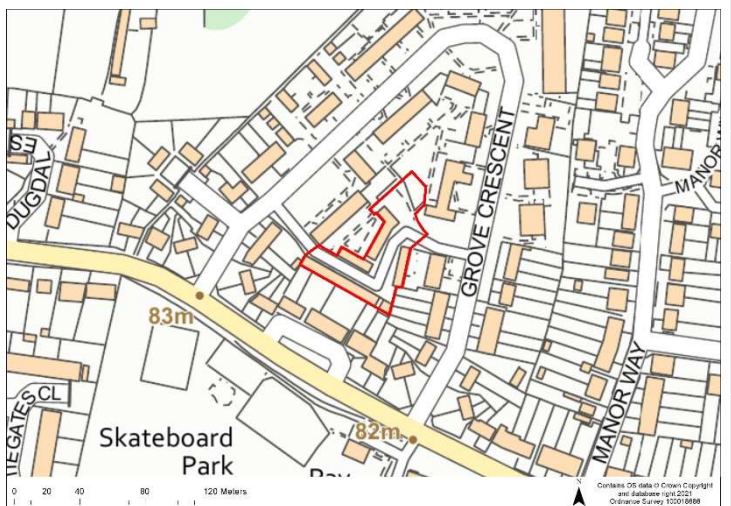
Question 83: Do you agree that site CFS20 is an appropriate development site?
Question 84: Please explain your answer.

CG16: Garages Owen's Way

Site Ref.	CG16	Site	Garages Owen's Way	Size (ha):	0.09
				Current Use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site and suitable access arrangements would need to be achieved.					

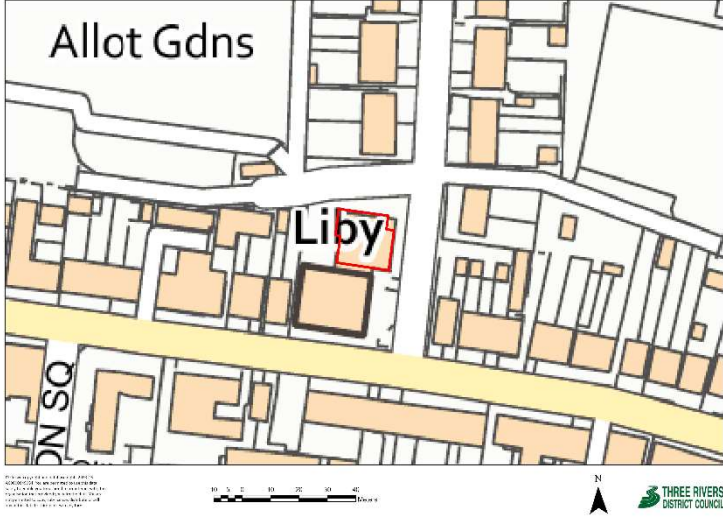
Question 85: Do you agree that site CG16 is an appropriate development site?
Question 86: Please explain your answer.

CG47: Garages off Grove Crescent

Site Ref.	CG47	Site	Garages off Grove Crescent	Size (ha):	0.26
				Current Use	Garages
				Dwelling Capacity	19 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site. The site is close to public open space, so onsite provision would not be required.					

Question 87: Do you agree that site CG47 is an appropriate development site?
Question 88: Please explain your answer.


CG65: British Red Cross Community Way

Site Ref.	CG65	Site	British Red Cross Community Way	Size (ha):	0.06
				Current Use	British Red Cross building
				Dwelling Capacity	6 - 9 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site. A detailed heritage impact assessment may be required prior to any development. The public right of way running along the northern boundary would need to be protected. Re-provision of the community facility would be required on-site.					

Question 89: Do you agree that site CG65 is an appropriate development site?

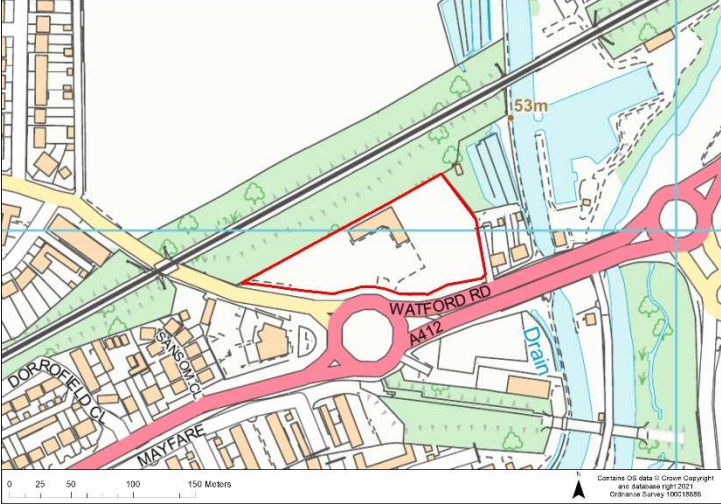
Question 90: Please explain your answer.

H9: 33 Baldwins Lane

Site Ref.	H9	Site	33 Baldwins Lane	Size (ha):	0.09
				Current Use	Car sales centre
				Dwelling Capacity	10 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
Comments <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. Any development would be required to provide suitable mitigation to address surface water flood risk and groundwater flood risk on the site. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Potential noise and vibrations caused by the use of the railway line should be addressed through mitigation.</p>					

Question 91: Do you agree that site H9 is an appropriate development site?
Question 92: Please explain your answer.

CFS61: Cinnamond House Cassiobridge


Site Ref.	CFS61	Site	Cinnamond House Cassiobridge	Size (ha):	1.0
				Current Use	Office, workshop and parking
				Dwelling Capacity	133 dwellings
				Phasing	11-10 years
				Green Belt	Yes. If allocated the Green Belt boundary would have to be revised. Partly brownfield site
Comments <p>Any development would be required to provide suitable mitigation to address surface water flood risk and groundwater flood risk on the site. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Potential noise and vibrations caused by the use of the railway line should be addressed through mitigation measures. The site would be required to provide open space and play space.</p>					

Question 93: Do you agree that site CFS61 is an appropriate development site?

Question 94: Please explain your answer.

14 Carpenders Park Potential Sites

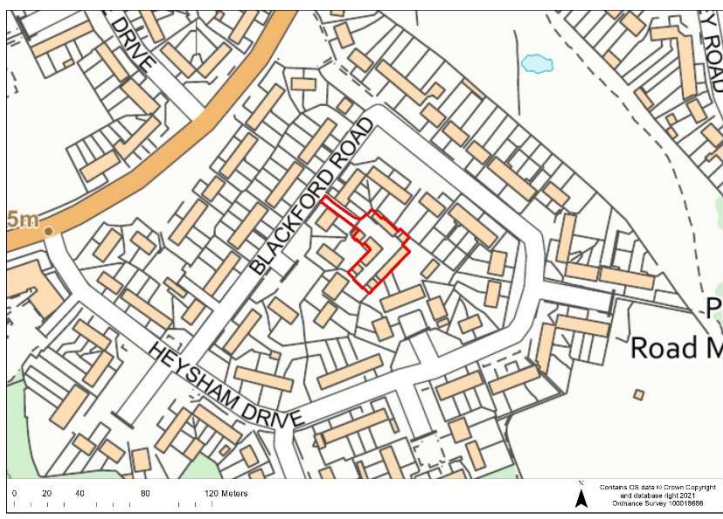
CFS12: Kebbell House and land to rear Delta Gain

Site Ref.	CFS12	Site	Kebbell House and land to rear Delta Gain	Size (ha):	0.9
				Current Use	Office, workshop and parking
				Dwelling Capacity	68 dwellings
				Phasing	1-10 years
				Green Belt	No. Brownfield site
Comments <p>Part of the site, to the north, is located in Flood Zone 3b; no development would be permitted on the area of the site in Flood Zone 3b. An 8 metre buffer from residential development and the main river which flows through the site will also be required. Proposals would need to provide suitable mitigation to address groundwater flood risk, surface water flood risk and fluvial flood risk on areas of the site. Any development would need protect the public right of way adjacent to the north of the site and take account of potential noise issues arising from the site's proximity to the railway line. The site would be required to provide open space and play space.</p>					

Question 95: Do you agree that site CFS12 is an appropriate development site?
Question 96: Please explain your answer.

15 South Oxhey Potential Sites

AS13: Garages at Blackford Road


Site Ref.	AS13	Site	Garages at Blackford Road	Size (ha):	0.1
				Current Use	Garages
				Dwelling Capacity	7 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Development would need to provide suitable mitigation to address surface water flood risk on areas of the site.					

Question 97

Do you agree that site AS13 is an appropriate development site?

Question 98: Please explain your answer.

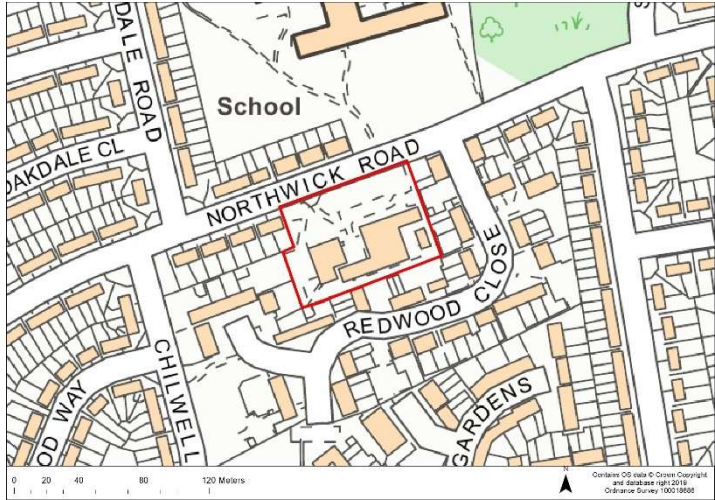
AS31: Garages at Woodhall Lane

Site Ref.	AS31	Site	Garages at Woodhall Lane	Size (ha):	0.09
				Current Use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Development would need to provide suitable mitigation to address surface water flood risk on areas of the site.					

Question 99: Do you agree that site AS31 is an appropriate development site?

Question 100: Please explain your answer.

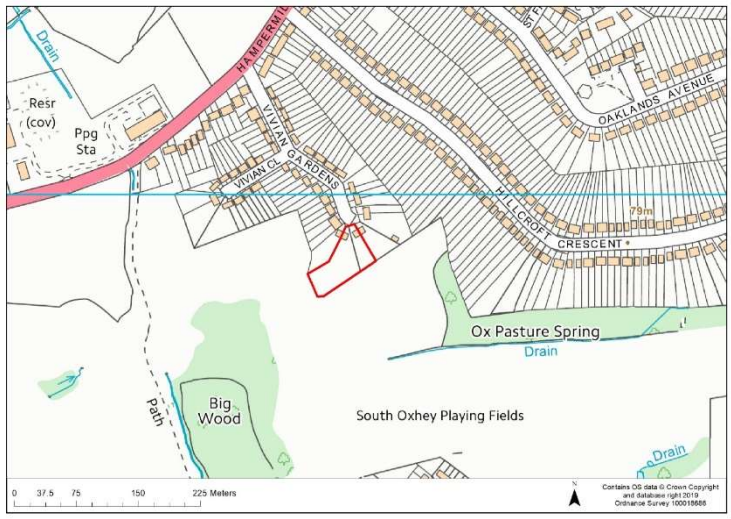
BR20: Northwick Day Centre Northwick Road

Site Ref.	BR20	Site	Northwick Day Centre Northwick Road	Size (ha):	0.56
				Current Use	Day Centre
				Dwelling Capacity	48 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
Comments <p>The site is part of an existing housing allocation in the Site Allocations LDD (adopted 2014) relating to the wider South Oxhey regeneration area (H29). Development would need to provide suitable mitigation to address surface water flood risk impacting the site and proposals would need to take account of protected trees within the site. The Northwick Road Day Centre facility would need to be re-provided in the local area as part of any development. The site would be required to provide open space and play space.</p>					

Question 101: Do you agree that site BR20 is an appropriate development site?
Question 102: Please explain your answer.

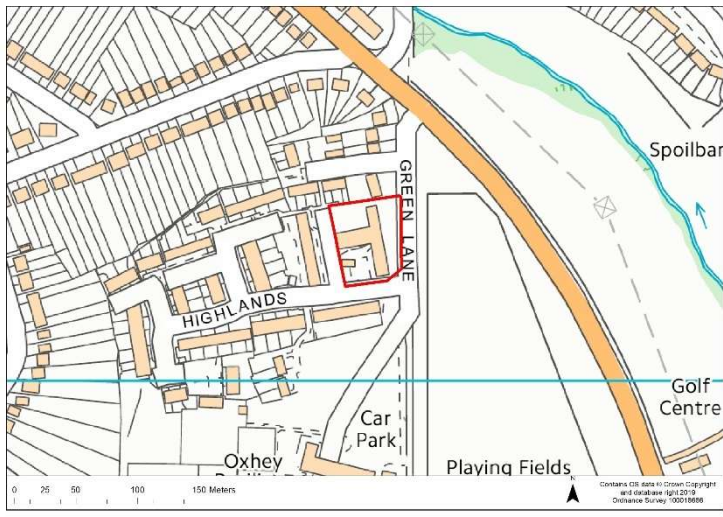
16 Oxhey Hall Potential Sites

PCS16: Vivian Gardens

Site Ref.	PCS16	Site	Vivian Gardens	Size (ha):	0.33
				Current Use	Residential gardens
				Dwelling Capacity	8 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
Comments <p>The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Development would need also to take account of protected trees within the site.</p>					

Question 103: Do you agree that site PCS16 is an appropriate development site?
Question 104: Please explain your answer.

H24: The Fairway Green Lane

Site Ref.	H24	Site	The Fairway Green Lane	Size (ha):	0.35
				Current Use	Residential care home
				Dwelling Capacity	32 dwellings
				Phasing	1-5 years
				Green Belt	No. Brownfield site
Comments <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Development would need to take account of protected trees within the site and would need to provide suitable mitigation to address surface water flood risk on areas of the site. Delivery of the site depends on an alternative mode of provision being made for the care home. The site would be required to provide open space and play space.</p>					

Question 105: Do you agree that site H24 is an appropriate development site?
Question 106: Please explain your answer.

Question 107: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation?