Land East of Oxhey Lane, Carpenders Park

Sequential Test

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Prepared on behalf of Burlington Developments London Ltd | May 25

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1. INTRODUCTION

1.1 This Sequential Test has been undertaken by Boyer on behalf of Burlington Developments London Ltd ('the Applicant') in support of the proposed development on Land East of Oxhey Lane, Carpenders Park, Watford, WD19 5RJ ('the Site').

1.2 The description of development for the proposed development is as follows:

Outline planning application for up to 256 homes (C3 use class)(including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children)(C2 use class) together with associated access, parking, open space and landscaping.

1.3 A Flood Risk Assessment (FRA) prepared by Ardent also accompanies the application submission. This Sequential Assessment should be read in conjunction with the FRA.

1.4 The application Site is located in an area classified on the Environment Agency (EA) Flood Risk map as Flood Zone 1 and is therefore at a low risk from river flooding. It is also at low risk of flooding from groundwater, sewers and artificial sources. However, a small proportion of the Site is at risk of surface water flooding. The various risks of flooding are summarised in Table 4-1 of the FRA (extract at Figure 1).

Flooding Type	Pre-Development	Post-Development	Comments
Tidal/Fluvial	Very low	Very low	Site confirmed as being located within Flood Zone 1.
Surface Water Flooding	Very low to high	Low	An area of the Site is at high risk of flooding; however, through the effective development and positive draining of the Site, this risk will be significantly reduced or removed.
Groundwater Flooding	Low	Low	Site is noted to be at 'likely' low risk of groundwater flooding.
Sewer Flooding	Anticipated low	Anticipated low	Await return of sewer flooding enquiry, however anticipated as low based on asset locations.
Artificial Sources	Low	Very low	Site is noted to be at 'likely' low risk of flooding from artificial sources.
Overall assessment of site risk = Low and suitable for residential development without flood mitigation measures.			

Figure 1 – Flood Risk Summary (Ardent FRA)

1.5 With regards to surface water flooding, the long-term flood risk mapping shows a ribbon of pluvial flooding along the localised valley running from a high point in the centre of the Site down to the watercourse to the south (illustrated in Figure 2). These areas are at medium to high risk with consideration of climate change. The percentage of the Site affected is as follows:

- 30-year – 0%
- 100-year – 0.3%
- 1,000-year – 5.6%

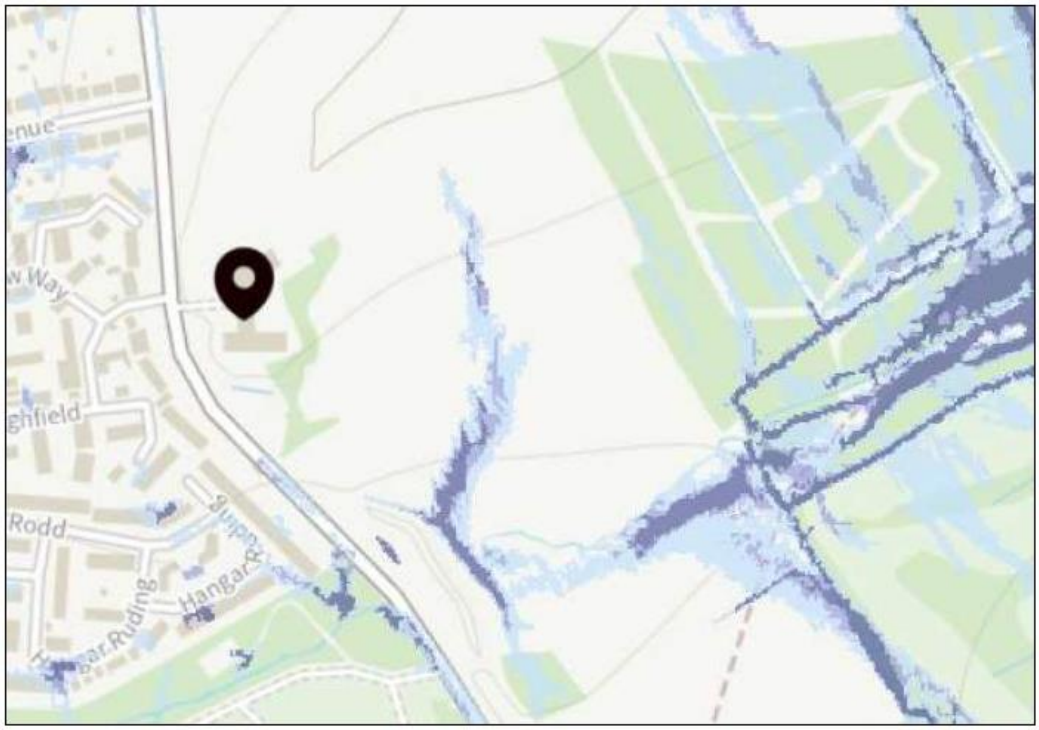

Figure 2 – Surface Water Flood Map (GOV.UK Mapping)

1.6 Therefore, in accordance with the NPPF (2024) a Sequential Test has been prepared.

2. PLANNING POLICY CONTEXT

National Planning Policy Framework

2.1 The National Planning Policy Framework (NPPF) (December 2024) seeks to ensure development is steered away from areas at the highest risk of flooding. Specifically, paragraph 170 outlines that:

"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere."

2.2 Paragraph 174 continues by stating that:

"Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test."

2.3 NPPF paragraph 175 further sets out:

"The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."

2.4 Additional guidance is provided in paragraph 177 which states that:

"Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3."

2.5 In respect of the Exception Test, paragraph 178 states:

"The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

2.6 The intent and effect of paragraphs 170-182 of the NPPF, read as a whole, is therefore to assess:

1) Whether there is land with a lower probability of flooding which is reasonably available for the same development as here proposed, bringing about the same wider sustainability benefits ('the Sequential Test'); and, if not

2) Whether:

- The wider sustainability benefits of developing the proposed development on the application site outweigh the flood risk of so doing; and
- The proposed development can be engineered to be safe for its lifetime in terms of flood risk ('the Exception Test').

Planning Practice Guidance

2.7 Further guidance on Sequential Tests is set out in the PPG.

2.8 Paragraph 023 confirms that the aim of the sequential approach is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, as far as possible, development in current and future medium and high flood risk areas considering all sources of flooding, including areas at risk of surface water flooding.

2.9 Paragraph 024 clarifies that where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites within medium risk areas; and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.

2.10 Paragraph 027 advises that for individual planning applications subject to the Sequential Test, the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed.

2.11 Paragraph 028 advises that 'reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'.

3. SEQUENTIAL TEST

3.1 It is necessary, therefore, first to identify the nature of the development proposed, and the wider sustainability benefits inherent thereto; and second, to assess whether there is other land with a lower probability of flooding which is reasonably available to accommodate that development, thereby being capable of bringing about the same benefits.

Nature of Development Proposed

3.2 The Site, which totals approximately 12.7 ha, is situated immediately to the east of the A4008. The Site falls outside of the existing defined urban area of Carpenders Park, which is a suburb of Watford, within Three Rivers District. The Site is wholly within the Green Belt.

3.3 The proposed development on the Site aims to deliver residential-led development comprising up to 256 homes (including affordable and self/custom build housing), housing with care (60 homes), a children's home, along with open and landscaping, SUDS, biodiversity features, and other associated elements.

3.4 In 2021, the Council published a Reg 18 version of the Local Plan which proposed the Site for allocation for 485 homes (ref: CFS69a). However, in 2023, the Council decided to reduce the extent of Green Belt release proposed in the 2021 version of the draft Local Plan. Subsequently, A revised Reg 18 draft Local Plan was published in October 2023 which removed many of the potential Green Belt allocations, including the Site.

Wider Sustainability Benefits of the Proposed Development

3.5 The starting point of an assessment of the wider sustainability benefits of the proposed development is the three strands set out within paragraph 8 of the NPPF, namely:

"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural

resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

3.6 In this regard, the proposed development brings about significant wider sustainability benefits which include:

- The delivery of up to 256 new homes on a site which is both available and deliverable, which will make an immediate, significant & valuable contribution to the supply of housing the district;
- Of the new homes (C3 use class) 50% will be affordable, of which a total of 70% would be social rent and 30% shared ownership;
- 10% of all market housing as self/custom build, providing an opportunity for local people to build their own homes;
- Provision of Housing with Care, to accommodate increasing demand across Hertfordshire;
- Provision of a children's home to address the need for additional bedspaces across Hertfordshire;
- Delivery of a significant level of high-quality public open space throughout the Site;
- Enhanced connectivity for existing & future residents by through improvements to the PROW and connection to an orbital pedestrian route around the Site, providing access to the wider countryside;
- Enhancements to transport infrastructure to support sustainable travel; and
- Provision of economic benefits in relation to construction of the Site and longer-term local spending & jobs.

Reasonably Available Sites

3.7 It is next necessary to assess whether other land with a lower probability of flooding which is reasonably available could bring about the same wider sustainability benefits.

3.8 The PPG (Reference: 7-028-20220825) defines 'Reasonably available sites' as *"those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development."*

3.9 The PPG then outlines that these include:

"a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'"

3.10 In adherence with the above guidance, sites were identified using the Three Rivers District Council Strategic Housing & Employment Land Availability Assessment (SHELAA) which forms part of the evidence base of The New Local Plan. The following documents have been reviewed as part of the assessment:

- SHELAA (2020) (including appendices)
- SHELAA Addendum (January 2023)
- SHELAA Addendum (October 2023)

3.11 The following process was undertaken to identify any reasonably available sites:

1. **Site Review:** Initially, sites of an insufficient size were discounted by applying a 25% buffer to the size of the site (9.5 ha). The site capacity was defined as the range of interconnected benefits that the proposed development would deliver (as per the Mead judgement). Interconnected smaller sites were also considered collectively to meet the capacity threshold. Additionally, it was ensured that the sites were suitably located, specifically adjacent to the settlement boundaries of secondary centres or higher in the Council's hierarchy.
2. **Flood Risk Assessment:** The second stage involved assessing the extent of hydrological risk of each of the identified sites. Sites with similar extents of surface water flooding and other sources of flooding were eliminated as these are not sequentially preferable.
3. **Planning Review:** The final step involved assessing the deliverability of development on the remaining sites within a reasonable timeframe. This assessment included evaluating the current planning status, evidence of promotion, strategic significance, and any technical constraints that might impede development. With regards to delivery, it is anticipated that the construction stage will commence in early 2027 and extend for a period of approximately 5 years thereafter, with first delivery in 2028. Alternatives have been assessed based on their availability for delivery in a similar timeframe.

Sequential Test

3.12 A total of 33 sites were identified following the Stage 1 site review process, which are assessed in the tables at Appendix 1 and Appendix 2. The relevant site references relate to the following Council Evidence Base documents:

- CFS – Call for Sites
- PCS – Previously Considered Sites
- OSPF – Other Sites Put Forward

- EOS – Edge of Settlement Sites

3.13 Of the 33 sites, 17 were discounted at Stage 2 as they were not sequentially preferrable in flood risk terms. The detailed assessments are provided in the table at Appendix 1. Most of these sites had other forms of flood risk such as rivers and groundwater. Some were also discounted as a greater proportion of the site was at risk of surface water flooding than the application Site.

3.14 This resulted in 16 sites which were subject to the Stage 3 planning review, which are assessed in the table at Appendix 2. Various planning challenges were identified including land availability, complex ownerships which are likely to delay delivery, and access constraints. As such, it is concluded that none of the sites are reasonably available alternatives.

3.15 It is therefore concluded that the Sequential Test has been passed.

Yatton Appeal Decision

3.16 Notwithstanding the above position, if the Council were to reach a different conclusion and consider that the Sequential Test had failed, the conclusions of the recent Appeal Decision at Yatton are particularly important.

3.17 An appeal was allowed at Land at Rectory Farm (North), Chescombe Road, Yatton on 18th March 2025 for outline permission for up to 190 homes (including 50% affordable) (ref: APP/D0121/W/24/3343144). One of the key matters was in relation to flood risk and the failure of the Sequential Test. The Inspector concluded that the proposal did not pass the Sequential Test, however they advised the following in their Appeal Decision (Para 175):

"Moreover, the judgment in Mead makes clear that a failure to comply with the sequential test is not automatically fatal to a planning application. Other material considerations, including housing need, may outweigh such a failure. It seems to me that, whether or not the exercise is described as an "exceptions test," the matters set out in paragraph 178 need to be taken into account."

3.18 When considering how much weight should be attached to the failure to pass the Sequential Test, the Inspector considered several factors. The following are considered relevant to this application:

- It would be necessary to allocate some sites that are at risk of flooding to meet the housing needs of the district, and the site was considered to be a suitable and sustainable location in terms of accessibility;
- The proposed dwellings would not be at risk of surface water flooding in the design flood event and there would be a safe means of access; and
- The proposal would not increase flood risk on adjoining land.

3.19 Despite significant weight being attached to the failure of the Sequential Test, the Inspector considered that the wider sustainability benefits would outweigh the flood risk. The sustainability benefits in that case are summarised as follows:

- Delivery of market housing (substantial weight);
- Delivery of affordable housing (substantial weight);
- Econmic benefits (moderate weight);
- Biodiversity enhancements (moderate weight); and
- Open space (moderate weight).

3.20 Given that the wider sustainability benefits were considered to outweigh the flood risk, it was concluded that the policies of the Framework related to areas at risk of flooding did not provide a strong reason for refusing the development.

3.21 In the case of the Application Site, there are similar circumstances which need to be taken into account when considering the weight to be attached to any failure of the Sequential Test, which are summarised below:

- Given the significant need for housing in Three Rivers (demonstrated by the Council's latest Housing Land Supply Position (December 2024) of 1.7 years and the 2023 Housing Delivery Test score of 30%), it is likely that sites will need to be allocated which are at risk of flooding. The Site is a highly sustainable location for new development;
- The proposed dwellings would not be at risk of surface water flooding post-development through the effective development and positive drainage of the Site, which will result in the risk being significantly reduced or removed;
- The proposal would not increase flood risk on adjoining land;

3.22 Furthermore, the proposed development would deliver various sustainability benefits through the delivery of market housing, affordable housing, self/custom build housing, housing with care; children's home, public open space, enhanced connectivity, enhancements to transport infrastructure and economic benefits (set out in further detail in Paragraph 3.6). The weighting to each of these is summarised in the Planning Statement which like in the case of the Yatton decision is substantial given the variety of housing types proposed and the desperate need for housing in Three Rivers.

3.23 It is therefore concluded that if the Council were to disagree with the conclusions of this Sequential Test, the wider sustainability benefits would outweigh the fact that a very small proportion of the Site is at risk of surface water flooding.

4. CONCLUSION

4.1 This Sequential Test has been prepared in support of the outline planning application for the development of up to 256 homes, housing with care, a children's home together with associated access, parking, open space and landscaping at Land East of Oxhey Lane, Carpenders Park. The Site is located within the administrative area of Three Rivers District Council (TRDC).

4.2 The Site is located within Flood Zone 1 (lowest risk), however a small part of the Site is at risk of surface water flooding. As such, a Sequential Test has been prepared.

4.3 A total of 33 sites have been identified and assessed to determine whether they are sequentially preferrable in flood risk terms and reasonably available. It has been concluded that 16 of these are sequentially preferrable in flood risk terms. However following the planning review, it has been concluded that none of these are reasonably available alternatives to the Site.

4.4 If the Council were to disagree with this conclusion, weight should be attached to the relevant flood risk mitigation measures and the fact that the proposed development would not cause an increase in flood risk elsewhere. Furthermore, it is considered that the substantial wider sustainability benefits of the proposed development (including the delivery of market housing, affordable housing, self/custom build housing, housing with care, a children's home, public open space, enhanced connectivity, enhancements to transport infrastructure and economic benefits) would outweigh the flood risk constraints.

APPENDIX 1 – STAGE 2 REVIEW SITE ASSESSMENTS

Site Reference (SHELAA)	Address	Settlement	Site Area (Ha)	Capacity (approx.) / Proposed Use	Assessment	Reasonably Available
CFS11	Carpenders Park Farm, Oxhey Lane	Carpenders Park	17.1 (whole site) 8.2 (within Three Rivers)	Proposed for secondary school & residential (96)	Stage 2 – Flood Risk There is a surface water flow path along the northern boundary of the site. A further surface water flood path runs through the south-west of the site, with a medium to high risk of surface water flooding. This covers a greater proportion of the site than the Application Site, with 2.5% at risk in the 30-year event, 4.5% at risk in the 100-year event and 9.9% at risk in the 1,000 year event. The site is therefore not an appropriate sequential alternative to the application site.	No
CFS26a	The Kings Langley Estate	Abbots Langley	58.5	1,125 dwellings	Stage 2 – Flood Risk With regards to surface water flooding the overall site is at low risk of surface water flooding, but the northern boundary of the site there is a surface water flow path at medium risk of flooding. The site is at moderate to high risk of groundwater flooding. During a 1 in 100 year groundwater flood event, water levels in the southwest of the site (14%) are estimated to be between 0.025m to 0.5m below the ground surface, which is at high risk. The site is therefore not sequentially preferrable in flood risk terms.	No
CFS26b	The Kings Langley Estate	Abbots Langley	95.6	1,338-2,390 dwellings	Stage 2 – Flood Risk There is a surface water flow path to the west of the site, ranging from high-low risk. There is also a flow path and	No

					area of ponding to the south-west, ranging from high-low risk. An area to the north-east of the site ranges from high-low risk of surface water flooding. This covers a greater proportion of the site than the Application Site, with 1.2% at risk in the 30-year event, 2.1% at risk in the 100-year event and 5.0% at risk in the 1,000 year event. The western half of the site is also at risk of groundwater flooding. The site is therefore not sequentially preferrable in flood risk terms.	
CFS33	Land at Maple Cross, Maple Lodge	Maple Cross	27.1	820-950 dwellings	<u>Stage 2 – Flood Risk</u> Two watercourses run through the site and a main river forms the south-western boundary, meaning that 14% of the site is in Flood Zone 3 and 8% is in Flood Zone 2. There are areas of high surface water flood risk to the south of the site, with a flow path along the access route through the site. This covers a greater proportion of the site than the Application Site, with 1.4% at risk in the 30-year event, 4% at risk in the 100-year event and 13.5% at risk in the 1,000 year event. As well as this, more than half of the site is at high risk of groundwater emergence. With regards to reservoir flooding, 41% of the site is likely to be affected in the event of a reservoir breach. The site is therefore not an appropriate sequential alternative to the application site.	No

CFS33a	Land at Maple Cross, Maple Lodge (revised boundary)	Maple Cross	25.6	768-896 dwellings	Stage 2 – Flood Risk Two watercourses run through the site and a main river forms the south-western boundary, meaning that parts of the site are in Flood Zone 3b and Flood Zone 2. There are areas of high surface water flood risk, with a flow path along the access route through the site. As well as this, over half the site is at high risk of groundwater flooding. The site is therefore not an appropriate sequential alternative to the application site.	No
CFS34a	Land South of Hornhill Road and Woodland Road	Maple Cross	31.8	950 dwellings	Stage 2 – Flood Risk There is a surface water flow path running from the central eastern boundary to the central southern area in the site. This is at low risk of surface water flooding. Against the eastern boundary and to the north-east of the site, there are small areas of the site at high risk. Some areas of the site are at risk of groundwater flooding. The site is therefore not sequentially preferrable.	No
CFS34b	Land South of Hornhill Road and Woodland Road (Combined Site)	Maple Cross	36.3	950 dwellings + 90-bed care home	Stage 2 – Flood Risk There is a surface water flow path running from the central eastern boundary to the central southern area of the site. This flow path is at low risk of surface water flooding. Against the eastern boundary and to the north-east of the site, there are small areas at high risk. Close to the northern boundary, adjacent to Franklin's Spring, there is small area which ranges from medium-low risk of surface water flooding. Parts of the site are also at risk of groundwater flooding.	No

					The site is therefore not sequentially preferrable.	
CFS53	Oxhey Golf Course and Driving Range, Prestwick Road	South Oxhey	15.8	474-632	<u>Stage 2 – Flood Risk</u> The majority of the site is within Flood Zone 1, however within the eastern land parcel, a small portion of the eastern boundary, which borders Hartsbourne Stream, is located within Flood Zone 3a. The site is at moderate to high risk of surface water flooding. Surface water flood risk is greatest within the western land parcel, where a large area of surface water ponding is predicted to form during a 1 in 30-year rainfall event (3% of the site), with 4.6% at risk in the 1 in 100-year event and 10.3% in the 1 in 1,000 year event. Both land parcels of the site are at high to very high risk of groundwater flooding, with 52% of the site in the highest risk categories. The eastern border of the eastern land parcel is at risk of reservoir flooding from Hartsbourne Flood Storage Area and Oxhey Woods Reservoir. The site is therefore not sequentially preferrable in flood risk terms.	No
CFS67	Land north of Oxhey Hall Farm	Oxhey Hall	13.9	278-417	<u>Stage 2 – Flood Risk</u> Flood Zone 2 is present across a large area along the northern and eastern borders of the site (30% of site area), with Flood Zone 3a generally covering the same area. Flood Zone 3b affects 20% of the site area within the north-western region and along the eastern and northern boundaries of the site.	No

					Furthermore, the site is at medium to high risk of surface water flooding. A surface water flowpath, at high risk of flooding, extends across the northern and western boundaries of the site. This covers a greater proportion of the site than the Application Site, with 14.6% at risk in the 30-year event, 21.7% at risk in the 100-year event and 37.2% at risk in the 1,000 year event. The site is at high risk of groundwater flooding. The majority of the area is within Category 4, where groundwater levels are predicted to be within 0.025m of the surface during a 1 in 100-year groundwater flood event. The northern and eastern areas of the site are at risk of flooding in the event of breach of Hartsbourne Flood Storage Area and Hilfield Park reservoir. The site is therefore not an appropriate sequential alternative to the application site.	
PCS47	South of Little Oxhey Lane	Carpenders Park	19.4	580-775	<u>Stage 2 – Flood Risk</u> Little Oxhey Lane and Oxhey Lane are both at risk of flooding from surface water (ranging from low-high risk), at points along the northern and eastern site boundaries. Two flow paths ranging from medium to high risk flow across the centre of the site. 1.5% of the site is at risk in the 1 in 30-year event, 4.3% in the 1 in 100-year event and 12.9% in the 1 in 1,000 year event. This exceeds the surface water flood risk at the Site. The site is therefore not an appropriate sequential alternative to the application site.	No
OSPF3b	Land at Heronsgate	Chorleywood	56	1564-1644	<u>Stage 2 – Flood Risk</u> There is high risk of surface water flooding along the southern boundary, adjacent to Long Lane. This is linked to	No

					larger area at the west of the site which is at low-medium risk of surface water flooding. There is an area of ponding at the south-eastern corner of the site, ranging from low-high risk. The site also is at risk of reservoir flooding. The site is therefore not an appropriate sequential alternative to the application site.	
EOS1.0	Land adjacent to Royal Masonic School	Rickmansworth	36.4	1274-1820	<u>Stage 2 – Flood Risk</u> To the north of the site, there is a small area (comprising 3% of the total site area) which is at high risk of surface water flooding. To the south, there are two flow paths which pass through the centre and east of the site and are at low risk of surface water flooding. The site is also at risk of groundwater flooding. The highest risk is along the eastern border, where groundwater levels are predicted to lie within 0.025m of the ground surface during a 1 in 100 event. The site is therefore not an appropriate sequential alternative to the application site.	No
EOS3.0	Land to the west of Copthorne Road	Croxley Green	20.26	709-1,013	<u>Stage 2 – Flood Risk</u> There is a surface water flow path in the western parcel, running from the River Chess to the west, through the centre of the site and to the north; the flow path ranges from low-medium risk of surface water flooding. Another surface water flow path is located to the south of the western parcel and ranges low-medium risk of surface water flooding. Areas of the site are also at risk of groundwater flooding.	No

					The site is therefore not an appropriate sequential alternative to the application site.	
EOS12.0	Land to the west of Maple Cross	Maple Cross	15.76	343-395	Stage 2 – Flood Risk Areas to the north of the site are at medium-high risk of surface water flooding, as well as the northern and western boundaries. The site is also at risk of groundwater flooding, as the north of the site has groundwater levels between 0.5m and 5m below the ground surface. The site is therefore not sequentially preferable.	No
EOS12.2	Land to the west and south of Maple Cross	Maple Cross	52.2	1500 dwellings plus education, community, retail, business uses	Stage 2 – Flood Risk Within the southern part of the site, there is a surface water flow path at low risk of surface water flooding. There are also smaller areas at high risk of surface water flooding across the site. Some parts of the site are also at moderate to high risk of groundwater flooding. The site is therefore not sequentially preferable.	No
CFS26e	Land to the south west of Kings Langley Estate, Abbots Langley	Abbots Langley	22	380	Stage 2 – Flood Risk Overall, the site is at low risk of surface water flooding, although there is a surface water flow path which forms in a 1 in 100 year rainfall event. The site is at risk of groundwater flooding as it falls within three groundwater flood risk zones. The site is therefore not sequentially preferrable.	No

EOS12.4	Land to the west and south of Maple Cross	Maple Cross	17.18	850	<u>Stage 2 – Flood Risk</u> Close to the northern boundary there is small area which ranges from medium-low risk of surface water flooding. Parts of the site are also at risk of groundwater flooding. The site is therefore not sequentially preferrable.	No

APPENDIX 2 – STAGE 3 REVIEW SITE ASSESSMENTS

Site Reference (SHELAA)	Address	Settlement	Site Area (Ha)	Capacity (approx.) / Proposed Use	Assessment	Reasonably Available
CFS8d	Notley Farm, Bedmond Road	Abbots Langley	11.4	342-456 dwellings	<u>Stage 2 – Flood Risk</u> Parts of the site are at low to high risk from surface water flooding. Two large surface water flow paths crossing the site, running along the southern boundary and through the centre of the site from the southeastern corner. <u>Stage 3 – Planning Assessment</u> Within the CFS assessment it is highlighted that access is a key constraint to development at the site. Specifically, a singular access to the site is proposed from Shepherd Close, which leads off from the cul-de-sac on Jacketts Field. Shepherd Close is a private road providing access to six existing dwellings and allotment. Suitable access to the site(s) from Shepherd Close is considered to be unachievable. An alternative access to Site CFS8c considered was from Love Lane, however this would only provide a through-route to the site through a residential garden and along the northern boundary of Love Lane play area. This is outside the boundary of Site CFS8b and is not considered appropriate. A development of this size would also require two vehicular access points, which is considered to be unachievable. In light of the above, the CFS assessment concluded that the site was undevelopable, and therefore is not an appropriate alternative.	No

CFS26c	West of the Kings Langley Estate	Abbots Langley	25.5	765-1,020 dwellings	Stage 2 – Flood Risk There is a surface water flow path, ranging from low to high risk, running through the north of the site, which ponds at the north-west of the site. Another surface water flow path ranging from low-high risk runs through the south of the site and ponds in the central-southern area. Stage 3 – Planning Assessment The indicative capacity far exceeds what is proposed at the Site, therefore the scale of development is such that deliverability of site is likely to be prolonged. As such, it is unlikely that the site will be available to be developed at the point in time envisaged for the development. The site is therefore not reasonably available.	No
CFS37	Land at Love Lane and Land southwest of Shepherds Lane	Mill End	17	625-895	Stage 2 – Flood Risk There are some areas at low-high surface water flood risk along the eastern boundary. Stage 3 – Planning Assessment The site has been deemed unsuitable by the Council due to the singular access only from Long Lane, therefore it is considered to be undeliverable and undevelopable. The site is therefore not reasonably available.	No
PCS4	East Green Street	Chorleywood	22.6	680-900	Stage 2 – Flood Risk The site has areas of surface water flood risk, including an area of medium to high risk along the eastern boundary and a surface water flow path across the site (medium risk). Stage 3 – Planning Assessment The site is wholly within the AONB so was concluded to be unsuitable for development in the CFS assessment.	No

					There are two applications pending on the site for the delivery of 300 units (ref: 24/0476/OUT) and the delivery of 675 units and a two-form entry primary school (ref: 24/0538/OUT). Therefore, the site is not sequentially preferrable, and there are other matters which mean that it is not reasonably available.	
PCS60	Land at Furtherfield	Abbots Langley	12.4	370-500	<u>Stage 2 – Flood Risk</u> Along the north-western boundary there is an area at high risk of surface water flooding. <u>Stage 3 – Planning Assessment</u> The site is allocated for open space and the CFS assessment notes that this use should be protected given the deficiency in open space found in the Open Space, Sport and Recreation Study (2019). The site is therefore not suitable for residential development.	No
OSPF22	Batchworth Park Golf Course	Rickmansworth	55.3	1,936-2,765	<u>Stage 2 – Flood Risk</u> There is high risk of surface water flooding along the southern boundary as well as scattered throughout the site, associated with the ponds located within the site. <u>Stage 3 – Planning Assessment</u> The CFS assessment notes that the golf course should be retained to meet open space requirements in the district, therefore it was concluded not to be suitable for residential development. Furthermore, given the scale of proposed development it is not considered capable of being delivered at the point in time envisaged for the development at the application site. It is therefore not a reasonably available site.	No

EOS4.0	Land adjacent to Bedmond Road & South of M25	Abbots Langley	10.18	356-509 228-325	Stage 2 – Flood Risk According to the Surface Water Flood Map, there is a surface water flow path running along the northern boundary of the site. While the majority of the site has low flood risk, there is a pocket on the northeastern boundary which has high flood risk. Stage 3 – Planning Assessment With regards to other constraints on the site, it's immediate proximity to the M25 raises noise and air quality concerns for future residents. It is highlighted in the CFS assessment that an approximate 100m buffer would be required between the M25 and residential development on the site. When applying a 100m buffer, the site area measures c. 7ha. When subtracting the area of the site which is under construction (relating to the 19/1666/FUL application), the developable area is reduced to c. 6.5ha. This developable site area would not be able to accommodate the proposed development by virtue of its size, and therefore, it is concluded that the site is not reasonably available.	No
EOS5.0	Land to the south of Bullsland Lane	Chorleywood	14.4	506-723	Stage 2 – Flood Risk Parts of the centre of the site range from low-high risk of surface water flooding. Stage 3 – Planning Assessment The north-east of the site is an allocated open space (in use as playing fields and a play area). The CFS assessment notes that the existing uses as public open space and allotments should be protected and therefore the eastern part of the site is deemed to be unsuitable for	No

					residential development. There are also access challenges for parts of the site. The remaining site area that is considered reasonably available for development is c. 5.3 ha, and part of this has already been developed as part of application ref: 16/2516/FUL. The remaining part of the site is not of a sufficient scale to accommodate the proposed development.	
EOS5.2	Land to the South of Berry Lane (Larger Site)	Chorleywood	10	350-500	<u>Stage 2 – Flood Risk</u> The site is in Flood Zone 1 and is not at risk of surface water flooding. <u>Stage 3 – Planning Assessment</u> The site contains Site EOS5.1 and Site PCS6. As noted in the CFS assessment, the site has significant constraints and is not considered suitable. As such, it is not a reasonably appropriate alternative.	No
EOS6.1	Land to the north of Parmiter's School	Garston	12.4	434-620	<u>Stage 2 – Flood Risk</u> A small area to the east is at low-high risk of surface water flooding. <u>Stage 3 – Planning Assessment</u> The site is concluded in the CFS assessment as being unsuitable for residential development due to the current sports use which should be protected. The site is also not available or achievable as it has not been promoted for development.	No

EOS7.0[1]	Land to the south of Shepherds Lane and west of the M25	Mill End	20.8	625-895	Stage 2 – Flood Risk The site is within Flood Zone 1 and the majority is at low risk of surface water flooding, although there are some areas a low-high surface water flood risk along the eastern boundary. Stage 3 – Planning Assessment The site is adjacent to the M25, which is likely to limit the developable area, as a reasonable buffer will be required to protect residents from noise and air quality impacts. This is likely to reduce the capacity of the site from the quantum referred to in the site assessment. Furthermore, the site is in three ownerships which is likely to cause deliverability challenges and could delay the delivery of the site. Notwithstanding the delivery timescales identified in the site assessment, it is anticipated that delivery would be protracted beyond these timeframes and therefore there is not a reasonable prospect that the site will be available to be developed at the point in time envisaged for the development. It is therefore concluded that it is not reasonably available.	No
EOS10.0	Land at Sandy Lodge Golf Course	Moor Park & Eastbury	27.5	962-1375	Stage 2 – Flood Risk A surface water flow path ranging from low to high risk of surface water flooding emerging from the west of the site flows across the centre of the site. There small patches of low risk flooding scattered throughout the site. Stage 3 – Planning Assessment	No

[1] This formed the first review of the site in the 2020 SHELAA.

					The CFS assessment notes that the golf course should be protected and is therefore not suitable for residential development. In addition to this, there are availability and achievability issues, as the site has not been promoted for development.	
EOS12.1	Land between M25 and Maple Cross	Maple Cross	31	775-1240	<u>Stage 2 – Flood Risk</u> There are some areas of low-medium flood risk around the western and southern boundaries, as well as a small parcel at the north-east of the site at low-medium flood risk. <u>Stage 3 – Planning Assessment</u> The site is not considered to be available, as the landowner has confirmed that only the southern area is available for development (EOS12.3). This is only 3.7 ha in size and is therefore insufficient to accommodate the proposed development. The site is therefore not reasonably available.	No
CFS8d	Notley Farm, Bedmond Road	Abbots Langley	11.4	342-456	<u>Stage 2 – Flood Risk</u> As discussed in table 1 (ref: CFS8d), there are areas at the site at risk of surface water flooding including two large flow paths. <u>Stage 3 – Planning Assessment</u> As discussed in Table 1 (ref: CFS8d), there are access challenges. Whilst the Jan 23 SHELAA Addendum suggests that the landowners have indicated possible solutions, no details have been provided and this may impact deliverability timescales. It is therefore concluded that the site is not reasonable available.	No

EOS7.0[2]	Land to the south of Shepherds Lane and east of the M25	Mill End	20.8	520-625	Stage 2 – Flood Risk The site is within Flood Zone 1 and the majority is at low risk of surface water flooding, although there are some areas a low-high surface water flood risk along the eastern boundary. Stage 3 – Planning Assessment The site is adjacent to the M25, which is likely to limit the developable area. Other sites in close proximity to the M25 have applied a 100m buffer. proximity to the motorway, which is likely to require a buffer, and protected trees within the site which could reduce the developable area. Furthermore, the site is in three ownerships which is likely to cause deliverability challenges and could delay the delivery of the site. It is therefore concluded that it is not reasonably available.	No
EOS4.0	Land adjacent to Bedmond Road & South of M25	Abbots Langley	10.18	356-509 228-325	Stage 2 – Flood Risk According to the Surface Water Flood Map, there is a surface water flow path running along the northern boundary of the site. While the majority of the site has low flood risk, there is a pocket on the northeastern boundary which has high flood risk. Stage 3 – Planning Assessment With regards to other constraints on the site, it's immediate proximity to the M25 raises noise and air quality concerns for future residents.	No

[2] This site was reviewed again in the SHELAA Addendum (October 2023) as the density of development was reduced from the 2020 submission.

					It is highlighted in the CFS assessment that an approximate 100m buffer would be required between the M25 and residential development on the site. When applying a 100m buffer, the site area measures 7ha. When subtracting the area of the site which is under construction (relating to the 19/1666/FUL application), the developable area is reduced to 6.5ha. This developable site area would not be able to accommodate the proposed development by virtue of its size, and therefore, it is concluded that the site is not reasonably available. Furthermore, the site is not available as it was withdrawn by the promoter in August 2023.	

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