



Sustainability Statement

LAND TO NORTH OF LITTLE GREEN LANE

Client: Richborough

Project: Land to North of Little Green Lane

Report: Sustainability Statement

Quality Assurance

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1.0 INTRODUCTION

- 1.1 Greengage Environmental Ltd are commissioned on behalf of the 'Applicant', Richborough, to undertake this Sustainability Statement for the development of Land to North of Little Green Lane, Croxley Green, within the Three Rivers District Council (TRDC) area.
- 1.2 This report details the approach that the applicant and the design team have collectively taken towards achieving a high standard of sustainable development and environmental performance. This Statement outlines the features that have been incorporated into the design proposals and the measures that will be implemented during the construction and operation phases, which aim to reduce the environmental impact of the scheme and contribute positively to sustainable development.
- 1.3 The purpose of the Sustainability Statement is to provide an independent verification that the design of the Proposed Development is in accordance with the sustainability and energy objectives of relevant planning policy at all levels and is an example of good practice in sustainable design. This Statement reports the performance of the Proposed Development using national, regional and local level guidance on sustainability indicators from both government and industry.
- 1.4 The Statement includes:
- A brief description of the Proposed Development;
 - A summary of the relevant international, national and local sustainable development and energy policy drivers; and
 - An examination of the performance of the scheme in accordance with other key sustainability policies at all levels, including the policies contained within the Three Rivers District Council local plan (2011)¹.
- 1.5 A review of the Proposed Development's sustainability against set planning objectives and best practice identifies the opportunities and constraints of both the application site and the proposals. By undertaking the sustainability appraisal at this stage in the design process, the potential to contribute positively to sustainable development is optimised. The Sustainability Statement therefore also provides a framework for the team to monitor the scheme's performance throughout its development.

2.0 THE PROPOSED DEVELOPMENT

- 2.1 The official planning description for the Proposed Development is as follows:
- 2.2 *'Construction of up to 600 residential dwellings (Use Class C3(a)), a 5-bedroom property for children's social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and café provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (All matters are reserved except for vehicular access).'*
- 2.3 The Proposed Development site is located north of Little Green Lane in Croxley Green, covering approximately 40.69 hectares. It is a greenfield site predominantly used for agriculture, with existing woodland comprising approximately 7% of the site area. Little Green Lane borders the site to the south, with the existing residential streets of Croxley Green beyond this. To the north and east of the site is Rousebarn Lane, a predominantly single track which runs alongside Whippendell Wood. To the west of the site are agricultural fields. A public footpath runs along the northern edge of the site, which will be referred to hereafter as 'Land to North of Little Green Lane'.
- 2.4 The site is currently designated as Green Belt but offers a strategic opportunity for sustainable development due to its proximity to the existing urban area.

Figure 2.1 Illustrative Masterplan (Source: Pegasus Group).



3.0 PLANNING POLICY & LEGISLATIVE CONTEXT

3.1 KEY SUSTAINABILITY DRIVERS

- 3.1 The aim of sustainable development is to seek to simultaneously progress economic, social and environmental goals and policies in ways that develop and maintain a good quality of life for everyone and enable future generations to do the same.
- 3.2 Strategies for sustainable development – broad, long-term plans of action aimed at achieving the goals of sustainable development – have been developed by national governments, and a range of organisations throughout the world, in order to set out a blueprint for action. There are also a number of international and national policy drivers for energy efficiency and reduced carbon dioxide (CO₂) emissions, which have been introduced to address the implications of climate change.
- 3.3 The remainder of this statement sets out these policy drivers and how the development has responded to each of these under key topic areas that together cover the environmental, social and economic needs of the Proposed Development.

National Policy Drivers

Climate Change Act 2008 (2050 Target Amendment)²

- 3.4 On 26th November 2008, the UK Government published the Climate Change Act 2008, the world's first long-term legally binding framework to mitigate against climate change. The Act initially set legally binding targets for greenhouse gas emission reductions of 80% by 2050 (from 1990 levels). This was amended in 2019 to a revised target of a 100% reduction in carbon emissions by 2050, over the 1990 baseline emissions levels, known as the net-zero target. In addition, there are interim carbon budget levels, which provide stepping stones to achieve the overall target.

National Planning Policy Framework (2024)

- 3.5 The National Planning Policy Framework (NPPF) was revised in December 2024³, replacing the previous NPPF that was first adopted in March 2012 with several subsequent updates. The NPPF sets out the Government's planning policies for England and how they are expected to be applied. It sets out a framework that aims to achieve sustainable development throughout the planning system with three overarching objectives – economic, social and environmental.
- 3.6 At the heart of the NPPF is a 'presumption in favour of sustainable development', which requires local authorities as part of any plan-making or decision-making, to provide clear guidance on how the presumption should be applied locally.

LOCAL POLICY DRIVERS

Three Rivers District Council Local Plan

3.7 Core Strategy (adopted October 2011)

- Policy CP1: Overarching Policy on Sustainable Development- Promotes sustainable development principles, including energy efficiency, renewable energy integration, and the reduction of carbon emissions.
- Policy CP2: Housing Supply- Ensures that new housing developments meet local needs while promoting sustainability.
- Policy CP4: Affordable Housing- Requires the provision of affordable housing within new developments to create inclusive communities.
- Policy CP12: Design of Development- Promotes high-quality design that enhances the character of the local area and incorporates sustainable building practices.
- Policy DM4: Carbon Dioxide Emissions and Renewable Energy- Requires new developments to incorporate measures to reduce carbon dioxide emissions and integrate renewable energy technologies.

Development Management Policies Local Development Document (LDD)

3.8 The Development Management Policies LDD, adopted in July 2013, provides further guidance on sustainable development, with key policies such as:

- Policy DM6: Flood Risk and Water Resources- Ensures that developments incorporate sustainable drainage systems and water conservation measures.
- Policy DM9: Contamination and Pollution Control- Aims to minimise pollution and contamination risks associated with new developments.
- Policy DM11: Open Space, Sport, and Recreation Facilities- Ensures that new developments provide adequate open space and recreational facilities to promote health and wellbeing.

Emerging Local Plan (in development)

3.9 The emerging Local Plan will replace the Core Strategy and other adopted documents, setting out the vision, objectives, and spatial strategy for the district up to 2036. It emphasises the need for sustainable development, including the reduction of carbon emissions, enhancement of green infrastructure, and support for renewable energy projects.

4.0 ENERGY



The UK carbon emissions target of achieving net zero by 2050 requires a significant decrease in energy consumption across all sectors. Currently buildings account for 49% of all UK emissions, of which between 40-65% are estimated to be a result of operational energy demand⁴.

Relevant Policy: Local Plan Policy DM4;

POLICY CONTEXT

4.1 The energy strategy for Land to North of Little Green Lane is guided by several key policies:

- Building Regulations Part L (2021) sets out enhanced requirements for energy efficiency, including improved insulation, airtightness, and the use of low-carbon technologies.
- Policy DM4 from the Three Rivers District Local Plan requires developments to reduce carbon emissions by at least 5% compared to Part L (2013) and encourages the incorporation of renewable energy sources.
- The Three Rivers Climate Change and Sustainability Strategy aims for net zero carbon emissions by 2045, supporting the use of energy-efficient designs and renewable energy technologies.

DESIGN DELIVERY

Building energy performance

4.2 The energy strategy for Land to North of Little Green Lane emphasises reducing energy demand, integrating low-carbon technologies, and maximising renewable energy generation. Key components include:

- High-Performance Building Fabric: A fabric-first approach will be adopted, ensuring advanced insulation, airtight construction, and high-performance windows. These measures aim to reduce heating and cooling demands, with U-values and air permeability rates that exceed Building Regulations Part L (2021) standards.
- Low-Carbon Heat Provision: Air Source Heat Pumps (ASHPs) will be used for both space heating and domestic hot water. ASHPs extract heat from the air, providing an efficient heating solution even at lower temperatures, significantly reducing onsite carbon emissions.
- Renewable Energy Generation: Photovoltaic (PV) panels will be installed across available roof space to generate renewable electricity onsite. This helps further reduce carbon emissions and contributes to the overall energy efficiency of the development.
- All-Electric Strategy: The development will adopt an all-electric systems strategy, eliminating the need for gas or other fossil fuel-based systems. This approach supports future-proofing the site, aligning with upcoming regulations that phase out fossil fuel heating systems.

- 4.3 These measures ensure the development meets and exceeds the energy efficiency targets set out in Policy DM4, while also supporting the broader goal of reducing carbon emissions and contributing to a net-zero carbon future.

5.0 TRANSPORT



Transport currently accounts for 31% of the UK's carbon emissions⁵. In order to meet the UK's ambitious target of an overall 100% cut in emissions by 2050, extensive decarbonisation of the transport sector is essential. Road transport accounts for c.90% of all transportation emissions⁶ and whilst a considerable proportion of road transport emissions will be addressed through technical developments in car engines and greater use of electric vehicles, a significant move to greener consumer behaviour is also required.

Relevant Policy: Local Plan Policy: CP10, DM13.

POLICY CONTEXT

- 5.1 The Three Rivers District Council Core Strategy, supported by the Development Management Policies LDD, outlines key policies to ensure sustainable transport is integrated into development proposals. Policy CP10 seeks to reduce dependence on private vehicles by improving access to public transport, encouraging walking and cycling, and ensuring that land use and transport planning are coordinated. Developments are required to include Travel Plans, Parking Design & Management Plans, and Construction Logistics Plans to align with the principles of sustainable transport and meet local policy objectives.
- 5.2 Policy DM13 focuses on the provision of cycle and car parking, with an emphasis on promoting active travel modes and reducing car dependency. It requires the inclusion of infrastructure for electric vehicles, ensuring that 20% of parking spaces have active charging capabilities, with passive provision for future installation in the remaining spaces. Cycle storage facilities must also be designed in accordance with the policy to encourage greater uptake of cycling as a primary mode of transport. These measures are key to fostering a healthier, more sustainable transport environment in the district.

DESIGN DELIVERY

Site Location to other transport nodes and routes

- 5.3 The Proposed Development will capitalise on its proximity to local transport nodes, particularly Croxley Underground Station and nearby bus stops. Direct and well-connected pedestrian routes will be designed to enhance walkability and provide easy access to these transport options. The development will also feature improved signage and pathways, ensuring seamless connectivity to the surrounding area and encouraging the use of public transport, as detailed in the Transport Assessment by Hub Transport Planning Ltd.

Transport Assessment & Travel Plan

- 5.4 A detailed Transport Assessment and Travel Plan have been prepared by Hub Transport Planning Ltd to evaluate the impact of the development on the local transport network, including vehicular traffic, public transport, and active travel modes. The Travel Plan includes measures to promote

sustainable transport options among residents and visitors, such as car-sharing schemes, public transport incentives, and walking or cycling initiatives. The plan will also monitor the development's ongoing transport impact to ensure compliance with sustainability objectives.

Cycle Access & Storage

- 5.5 The development will be designed to encourage cycling as a primary mode of transport by providing secure, easily accessible cycle storage in line with Policy DM13. Cycle parking will be strategically located near building entrances and along pedestrian routes to promote convenience. The design will also incorporate dedicated cycle paths within the development, linking to existing cycling networks identified in the Transport Assessment, ensuring a safe, pleasant environment for cyclists and further reducing car dependency.

Walking and Cycling

- 5.6 The development will provide well-connected pedestrian and cycle routes, linking to the existing local network, particularly to Croyley Underground Station and nearby bus stops. The Transport Assessment highlights enhancements to active travel infrastructure, and the Travel Plan includes a travel audit to identify areas for improvement in walking and cycling accessibility.

Parking & EV Charging Points

- 5.7 The development will meet the parking standards set out in Policy DM13 and Appendix 5 of the Development Management Policies LDD. Residential parking spaces will be designed with provisions for future EV charging, and cycle storage will be provided in accordance with the standards for residential units.
- 5.8 EV charging infrastructure will be integrated into the development in accordance with emerging local policy, with active provision for 20% of parking spaces and passive provision for the remaining spaces.

6.0 MATERIALS & WASTE



49% of UK carbon emissions stem from buildings, of which between 40-70% of whole life carbon emissions are a result of embodied carbon within the materials⁵. Through implementing circular economy principles, efficient and responsible design can result in reduced material use, therein achieving significant carbon and waste reductions.

Relevant Policy: Local Plan Policy CP1.

POLICY CONTEXT

- 6.1 Policy CP1 (Sustainable Development) of the Three Rivers District Local Plan promotes sustainable development principles by encouraging the efficient use of resources, reduction of waste, and incorporation of environmentally responsible practices throughout the lifecycle of developments. The policy aims to balance environmental, social, and economic objectives to support long-term sustainability.

DESIGN DELIVERY

- 6.2 The design will explore opportunities to minimise material use and waste generation throughout the construction and operational phases. Construction methods will be evaluated to identify techniques that reduce material wastage, such as modular construction and standardisation of building components. The potential for reducing environmental impacts through efficient material use will be carefully considered during the design development.

Responsible Sourcing of Materials & Local Sourcing

- 6.3 A sustainable procurement plan will be developed to ensure procurement of responsibly sourced materials with a high-level of recycled content and that are recyclable and reusable at the end-of-life stage, in a bid to lower the development's overall embodied carbon footprint and to work towards the Proposed Development's and local authority's circular economy goals.

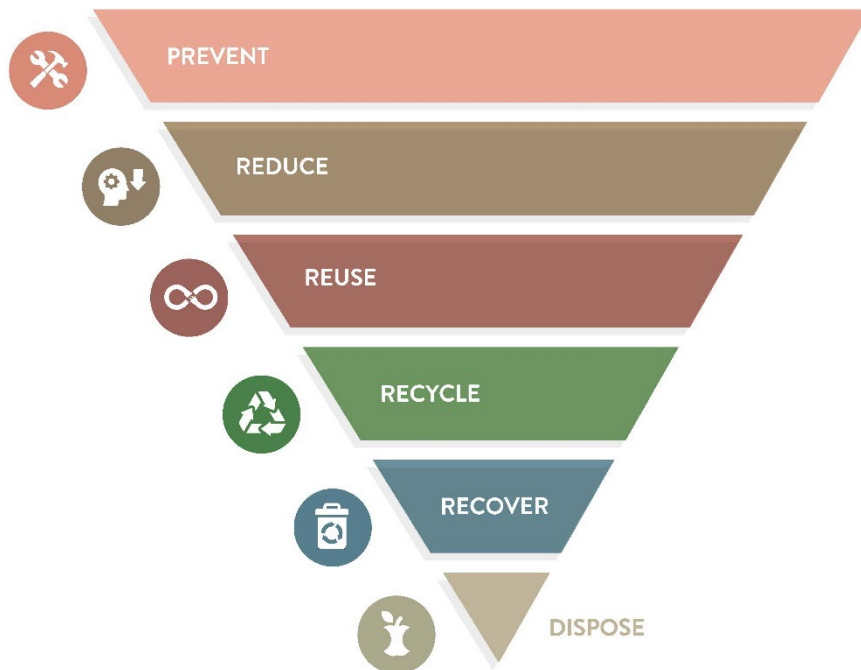
Construction Phase

Site Waste Management

- 6.4 The Proposed Development will focus on reducing construction waste and maximising material efficiency in line with local and national policy targets. This will involve implementing strategies to minimise waste generation during construction, including careful material selection, accurate ordering, and promoting reuse and recycling of materials wherever feasible.
- 6.5 The development will look into prioritising waste segregation on-site to facilitate the recycling of construction and demolition waste, with a strong emphasis on diverting significant volumes away from landfill. Contractors will be required to monitor waste management practices to ensure compliance with sustainability objectives and achieve high resource efficiency. These measures will

support the development's alignment with policy requirements while contributing to broader circular economy and environmental goals.

Figure 0.1 Principles of the Waste Hierarchy to be implemented within the SWMP



Operational Phase

Operational Waste

- 6.6 For operational waste, the design will include clearly defined areas for the segregation and storage of recyclable and non-recyclable materials, ensuring compliance with local authority requirements. These provisions will be easily accessible to occupants and designed to support multiple waste streams, such as general waste, recyclables, and organic waste.

7.0 WATER



Climate change is resulting in an increased frequency and severity of extreme weather events, such as droughts and flooding. The efficient use of water, including implementing methods of harvesting and reuse, as well as reducing susceptibility to flooding, is therefore essential.

Relevant Policy: Local Plan Policy CP1, CP8, DM8.

POLICY CONTEXT

- 7.1 The Three Rivers District Council Core Strategy Policy CP1 promotes sustainable development by encouraging the use of water-saving measures such as smart metering, water-efficient fixtures, and rainwater harvesting systems to reduce overall water consumption. For residential developments, this includes a requirement to meet water efficiency targets, while non-residential buildings are expected to incorporate measures that meet or exceed the BREEAM Excellent standard for water conservation.
- 7.2 Policy CP8 focuses on minimising flood risk by ensuring that development proposals incorporate sustainable drainage systems (SuDS) and natural flood management methods.
- 7.3 Additionally, Policy DM8 requires that developments achieve greenfield runoff rates where possible and manage surface water close to its source using techniques such as infiltration basins, permeable paving, and other SuDS features. These measures ensure that developments address water use efficiency, flood management, and environmental enhancement in an integrated and sustainable way.

DESIGN DELIVERY

Water Efficiency

- 7.4 Water specification: The development will integrate water-efficient fixtures and fittings, ensuring compliance with water consumption targets set by local policies. All residential units will aim to achieve a water consumption rate of no more than 105 litres per person per day, improving efficiency compared to the standard Building Regulations target of 120 litres per person per day.
- 7.5 Rainwater Harvesting: Rainwater harvesting systems will be considered to collect and reuse water for non-potable purposes, such as landscape irrigation and toilet flushing, further reducing reliance on mains water.
- 7.6 Flow control devices: Flow control devices will need to be installed to regulate water pressure and ensure efficient water usage across the site, minimising waste and optimising consumption.
- 7.7 Leak detection: Smart leak detection systems will be implemented to monitor and identify any leaks early, ensuring prompt repairs and reducing unnecessary water loss.

- 7.8 Irrigation: Irrigation systems for landscaped areas will incorporate drip irrigation technology and the use of harvested rainwater to minimise potable water usage.

Flood Risk & Sustainable Drainage

- 7.9 The Flood Risk Assessment (FRA), prepared by BWB Consulting, confirms that the site is entirely within Flood Zone 1, indicating a low probability of flooding from rivers or seas. The nearest flood zones are associated with the River Gade and the Grand Union Canal, approximately 500 meters east of the site, with topography providing a natural barrier. Risks from groundwater, surface water, and sewers have been assessed and are considered low. To mitigate residual risks, finished floor levels will be raised a minimum of 150mm above surrounding ground levels, and ground profiling will ensure overland flows are directed away from built development.
- 7.10 The proposed Surface Water Drainage Strategy aims to sustainably manage surface water runoff without increasing flood risk on or off-site, in line with the National Planning Policy Framework (NPPF). As the site is currently agricultural land, infiltration is assumed to be the primary drainage mechanism. In accordance with the drainage hierarchy, Sustainable Drainage Systems (SuDS) are proposed, including two ecological/attenuation areas positioned based on the site's topography. These features will ensure surface water discharge is limited to greenfield QBar rates, minimising downstream flood risk. Additionally, the SuDS features will be designed to provide multiple functions, including amenity and biodiversity enhancements, potentially incorporating permanent wetland features.
- 7.11 To manage the impacts of climate change, the drainage strategy incorporates attenuation designed to accommodate a 1-in-100-year storm event, plus a 40% allowance for climate change. Storage volumes will be calculated for each land parcel, considering impermeable surfaces and contributing areas based on the illustrative masterplan. The strategy demonstrates that the development can proceed in a sustainable manner, with no increase in flood risk to the site or surrounding land, aligning with NPPF and local policy requirements.

Construction

- 7.12 During the construction phase, the principal contractor will be required to monitor, report and set targets against water consumption. Targets will be identified by the principal contractor and informed by the Constructing Excellence Key Performance Indicators.

8.0 BIODIVERSITY & GREEN INFRASTRUCTURE



Biodiversity is the variability among living organisms within an ecosystem; a highly diverse ecosystem is an indicator of a healthy and thriving natural environment. The UK has seen a dramatic loss in biodiversity and ecosystem integrity especially through the latter half of the twentieth century, therefore, the protection and enhancement of biodiversity is a key requirement throughout the development process.

Relevant Policy: Local Plan Policy DM6.

POLICY CONTEXT

- 8.1 Three Rivers District Council's Policy DM6 emphasises the protection of biodiversity and natural habitats. It mandates that developments affecting Sites of Special Scientific Interest (SSSI), Local Nature Reserves, or Local Wildlife Sites must safeguard these areas and any protected species. Development proposals must demonstrate that adverse impacts on biodiversity will be minimised and that compensatory measures will be implemented to maintain or enhance local biodiversity.
- 8.2 In addition, the National Planning Policy Framework (NPPF) encourages biodiversity net gain, requiring developments to leave the natural environment in a measurably better state than before. This aligns with the Environment Act 2021, which introduces mandatory biodiversity net gain provisions, ensuring a minimum of 10% improvement for developments.

DESIGN DELIVERY

Preliminary Ecological Appraisal

- 8.3 The ecological appraisal highlights the site's location within the Green Belt, with the land predominantly consisting of low-value arable cropland but containing key ecological features such as a 2.5ha stand of ancient woodland, called Green Lane Wood, and hedgerows. The development will avoid direct impacts on ancient woodland by incorporating 30m buffer zones reinforced with native barrier planting to mitigate disturbance and edge effects. Surfaced and unsurfaced paths are likely to be created in some areas of the 15-30m buffer, as well as the outer edges of SuDS features.
- 8.4 Surveys have identified the potential presence of protected species, including breeding birds and foraging or roosting bats. To mitigate impacts, the design includes creating dark corridors along key bat foraging routes to reduce light pollution and installing nesting and roosting features to support these species. These measures aim to preserve and enhance the site's ecological value while ensuring compliance with wildlife legislation and minimising the ecological impact of development within the Green Belt.

Biodiversity Impact Assessment

- 8.5 The development aims to deliver at least 10% Biodiversity Net Gain (BNG) as required by policy. This will be achieved through the creation of wildflower meadows, native woodland planting, and the enhancement of ecological corridors to improve habitat connectivity. Ecological/attenuation areas will provide multifunctional benefits by combining biodiversity enhancements with sustainable water management and recreational opportunities. The Biodiversity Impact Assessment (BIA) specifies that the Proposed Development will create an on-site net gain in habitat units of 34%, and a 43.15% net gain in hedgerow units through the implementation of these measures.

Construction Phase

- 8.6 Prior to the construction phase, mitigation measures shall be implemented through a Construction Management Plan (CMP) to ensure appropriate measures are implemented as necessary, to avoid adverse impact on any flora and fauna within the construction zone.

9.0 POLLUTION



There are many forms of environmental pollution arising from building construction and operation including air, water, noise, light and dust pollution. A significant proportion of this is airborne, however some pollutants can also escape to soil and groundwater courses. The impact of noise, dust and light spill can cause disturbance and aggravation to others.

Relevant Policy: Local Plan Policy DM9.

POLICY CONTEXT

- 9.1 Three Rivers District Council's Policy DM9 focuses on the control and minimisation of pollution, including air, noise, water, and light pollution, throughout the lifecycle of new developments. This policy requires that developments demonstrate they will not result in unacceptable risks to human health, local biodiversity, or water quality due to pollution. Additionally, all major developments must include assessments for air and noise pollution as part of the planning application, ensuring that both construction and operational phases of the development meet appropriate environmental standards.
- 9.2 The National Planning Policy Framework (NPPF) also highlights the importance of preventing development from contributing to unacceptable levels of pollution. It advises that developments should mitigate any potential adverse effects on air, water, and soil quality, and actively seek to improve local environmental conditions.

DESIGN DELIVERY

Air Quality

- 9.3 An Air Quality Assessment has been prepared by BWB Consulting, which involved a qualitative construction phase dust assessment in accordance with Institute of Air Quality Management Guidance, a detailed operational phase road traffic emissions assessment, and predictions of pollutant concentrations across the site. The assessment concluded that the impact of the Proposed Development with regards to the current relevant air quality objectives was considered to be 'not significant'. No further mitigation is required but measures included in the development that may be considered beneficial to air quality include provision for pedestrians and cyclists and Electric Vehicle charging points.

Noise

- 9.4 A Noise Impact Assessment, prepared by BWB Consulting, evaluated the potential noise effects of the proposed development. Baseline surveys identified road traffic and occasional agricultural activity as the primary noise sources. Mitigation measures have been incorporated into the design, including high-performance building fabric, double-glazed windows with acoustic vents, and strategic site layout to ensure compliance with internal noise standards for residential areas.

Outdoor spaces are designed to maintain noise levels within acceptable limits, ensuring a comfortable environment for residents. During construction, noise will be controlled through a robust Construction Environmental Management Plan (CEMP), which includes measures such as restricted working hours, quieter equipment, and temporary acoustic barriers where necessary. These measures will ensure noise impacts are minimized, supporting the health and wellbeing of future occupants and the surrounding community.

Construction Phase

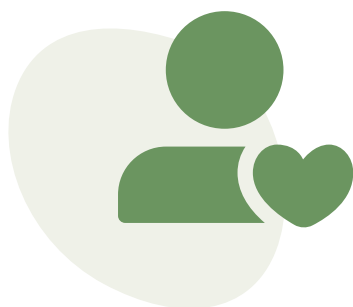
Pollution Prevention

- 9.5 Pollution prevention procedures, in line with those outlined within PPG6, will be followed throughout the course of the construction process to prevent any pollution incidents. Upon their appointment, the main contractor will complete a version of the PPG6 checklist outlining the precise methodology through which such incidences will be avoided.

Dust

- 9.6 The construction phase of the project has the potential to increase levels of airborne dust and particulate material. As such, the impacts of these works will be mitigated through the production and implementation a Construction Management Plan by the appointed contractor. This documentation will contain a copy of the PPG6 checklist referenced within the above section and will clearly define the methods through which air pollution from the site will be actively reduced in order to not bear any impact on those working on site or occupy surrounding buildings, such as abstaining from undertaking major dust producing tasks on gusty days and through using water to capture the particles.

10.0 HEALTH, WELLBEING & SOCIAL VALUE



Health and wellbeing focuses on the occupant's quality-of-life and enabling communities and individuals to live healthy and happy lives. This includes ensuring that a design maximises health and social benefits to the building user and wider community.

Relevant Policy: Local Plan Policy CP12.

POLICY CONTEXT

- 10.1 Three Rivers District Council's Policy CP12 supports high-quality design that enhances health and wellbeing by ensuring that developments provide access to green spaces and recreational facilities. The policy encourages the integration of social infrastructure that promotes physical activity, mental health, and social cohesion, reflecting the Council's aim to foster healthier communities.
- 10.2 Policy DM11 further emphasises the need for developments to contribute to open spaces, sport, and recreational facilities, particularly in residential areas. Developments of 25 or more dwellings must allocate 10% of the site area for open space, ensuring that these areas are well-integrated, accessible, and provide opportunities for recreation and social interaction, which are key drivers of health and wellbeing.

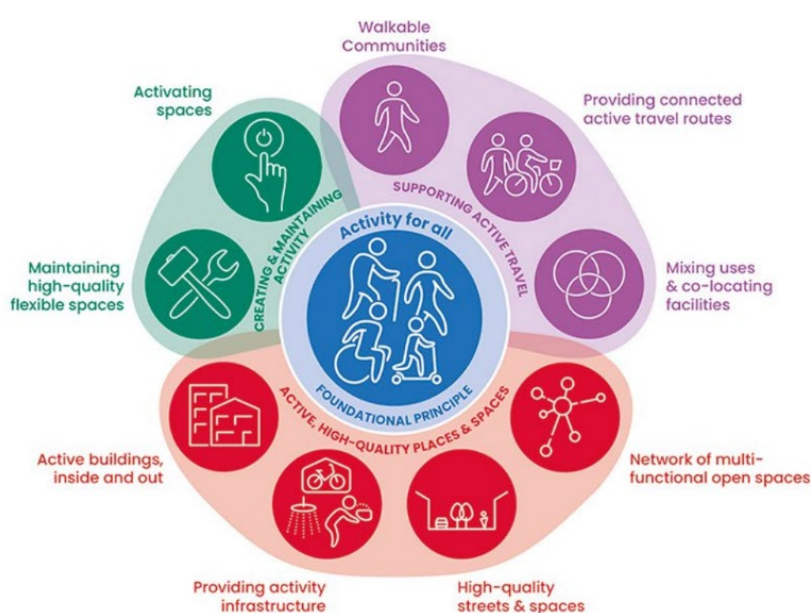
DESIGN DELIVERY

Public Realm & Outdoor Space

- 10.3 The design of the public realm aligns with local and national planning policies by incorporating features that enhance climate resilience while providing high-quality, multifunctional outdoor spaces. Green infrastructure, including native tree planting and landscaped areas, will mitigate urban heat island effects, improve air quality, and support biodiversity. Permeable paving and other sustainable drainage measures will be utilised to manage surface water runoff effectively, reducing flood risk in compliance with sustainable drainage policies. These spaces will not only address environmental objectives but also offer recreational and aesthetic benefits, creating a vibrant, policy-compliant public realm.
- 10.4 The Proposed Development will apply Sport England's 10 Active Design principles⁷, which are summarised below:
- 10.5 Principle 1 - Activity for all; all environments should support physical activity equitably across all ages, ethnicities, genders and abilities.
- 10.6 Principle 2 - Walkable communities; facilities for daily essentials and recreation should be within easy reach of each other by means of active travel.
- 10.7 Principle 3 - Providing connected active travel routes; encourage active travel for all ages and abilities by creating a continuous network of routes connecting places safely and directly.

- 10.8 Principle 4 - Mixing uses and co-locating facilities; to encourage people to use active travel to get to destinations with multiple reasons to visit. Places with more variety, higher densities and a mix of uses also reduce the perception of distance when travelling through spaces.
- 10.9 Principle 5 - Network of multi-functional open spaces; accessible and high quality open space should be promoted across cities, towns and villages to provide opportunities for sport and physical activity, as well as active travel connections and natural or civic space for people to congregate in and enjoy.
- 10.10 Principle 6 - High-quality streets and spaces; streets and outdoor public spaces should be active environments in their own right. They should be safe, attractive, functional, prioritise people and be able to host a mix of uses, with durable, high quality materials, street furniture in the right places and easy-to-use signage.
- 10.11 Principle 7 - Providing activity infrastructure; to enable sport, recreation and physical activity to take place across all contexts including workspaces, sports facilities and public space, to facilitate activity for all.
- 10.12 Principle 8 - Active buildings, inside and out; buildings should be designed with providing communities for physical activity at the forefront.
- 10.13 Principle 9 - Maintaining high quality flexible spaces; spaces and facilities should be effectively maintained and managed to support physical activity. These places should be monitored to understand how they are used, and flexible so that they can be adapted as needed.
- 10.14 Principle 10 - Activating spaces; the provision of spaces and facilities which can help to improve physical activity should be supported by a commitment to activate them, encouraging people to be more physically active and increasing the awareness of activity opportunities within a community.

Figure 0.1 Sport England's Active Design Principles (Source: Sport England, 2024)



Local Amenities

- 10.15 The development will integrate sustainable and accessible local amenities to meet policy objectives for promoting community well-being and reducing carbon emissions. Provisions such as cycle storage, EV charging points, and localised facilities will support sustainable travel and align with policies encouraging low-carbon infrastructure. The potential inclusion of community gardens or allotments will foster local food production, align with biodiversity and climate adaptation goals, and promote social interaction, further meeting sustainability and inclusivity requirements outlined in local planning frameworks.

Accessibility

- 10.16 The scheme ensures that all public spaces and amenities are designed to meet accessibility standards and comply with inclusivity policies. Pathways and communal areas will be constructed with durable, slip-resistant materials, providing safe access in all weather conditions, including extreme heat and heavy rainfall, as required by building and public safety regulations. Enhanced connectivity to public transport networks and pedestrian and cycle-friendly routes will align with transport policies, encouraging sustainable, low-carbon travel options while reducing reliance on private vehicles.

Construction phase**Considerate Construction Practices**

- 10.17 As highlighted within the Pollution chapter, the Proposed Development is to commit to achieving Considerate Constructors Scheme certification meaning the site will be following best practice measures with regards to appearance, community engagement, environmental consideration, safety measures and workforce wellbeing throughout the construction phase.

11.0 SUMMARY

- 11.1 This Sustainability Statement has been written to demonstrate compliance with the various local and regional planning policies and supports the planning application for the Proposed Development at Land to North of Little Green Lane within the administrative boundary of the Three Rivers District Council.
- 11.2 The statement demonstrates how the development proposals are meeting key policy objectives, responding to local needs and requirements, and conforming to best practice sustainability criteria applicable to this development, including demonstrating compliance to Local Planning Policy CP1 requiring the production of a Sustainability Statement.
- 11.3 The Proposed Development satisfies policy objectives by optimising sustainability through the incorporation of best practice design, construction and operation measures. Some of the key features highlighted in this sustainability statement include:
- Implementation of a comprehensive energy strategy that prioritises energy efficiency through a fabric-first approach, incorporating measures such as advanced insulation, airtight construction, and high-performance glazing. The development also integrates low-carbon technologies, including air source heat pumps (ASHPs) and on-site renewable energy generation through photovoltaic (PV) panels, ensuring a sustainable and future-proof energy solution;
 - Incorporation of water efficiency measures in design to reduce potable water consumption to 105 l/p/d;
 - A location with good access to sustainable transport options, including proximity to Croxley Underground Station, nearby bus routes, and enhanced pedestrian and cycling connections, encouraging the use of low-carbon travel modes;
 - Incorporation of sustainable transport measures, such as cycle storage spaces and facilities to ensure building users can make use of the existing transport network;
 - Commitment to resource efficiency by reducing material use and waste through sustainable construction, responsibly sourced materials, and efficient waste segregation to lower embodied carbon and maximise reuse;
 - Incorporation of SuDS measures to reduce surface water run-off to Greenfield run-off rates;
 - Commitment to ensuring all forms of pollution are minimised in design and construction, in particular air quality and acoustics;
 - Commitment to positively enhancing the site biodiversity through the incorporation ecological enhancement measures to provide an overall biodiversity net gain of at least 10%; and
 - Promotion of health, wellbeing, and social value through the integration of accessible green spaces, recreational areas, and community facilities. The design incorporates features to enhance physical and mental health, such as walking and cycling routes, native landscaping, and spaces for social interaction, all aligned with inclusivity standards and sustainability objectives.

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[https://www.gov.uk/government/statistics/transport-and-environment-statistics-autumn-2021/transport-and-environment-statistics-autumn-2021#:~:text=Transport%20produced%2027%25%20of%20the,transport%20vehicles%20\(111%20MtCO2e\).](https://www.gov.uk/government/statistics/transport-and-environment-statistics-autumn-2021/transport-and-environment-statistics-autumn-2021#:~:text=Transport%20produced%2027%25%20of%20the,transport%20vehicles%20(111%20MtCO2e).)

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