

**Sent:** 21 February 2025

**Subject:** Croxley Green Parish Council response to the outline planning application  
24/2073/OUT

Good morning,

Once again thank you for the deadline extension for commenting on the outline application mentioned above.

Please find attached the Parish Council response.

Kind regards

Dimi

**Dimitrisz Sopisz BSc, MCIHort, MPMA**

**Clerk to the Council**

**Croxley Green Parish Council**

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## **Introduction**

We object to the application for the following reasons:

The site is open farmland and part of the protected green belt currently enjoyed by thousands of residents. It can be seen from all the roads and footpaths adjoining and approaching it. The loss of amenity resulting from its removal would affect the well being of all those who currently enjoy it. It is not and does not meet the test of grey belt.

The proposed design, layout and density are out of keeping with the existing patterns in the environs. Insufficient parking is provided.

Existing services: sewerage, water supply and electricity supply are not adequate to support the proposed development.

Traffic in the area will be adversely affected by the proposed development, and a sustainable transport plan has not been demonstrated.

## **Green Belt, Planning & Heritage**

**Green Belt Protection** – The land is currently protected Green Belt. It should not be developed unless there are exceptional circumstances, which have not been demonstrated. This is not “Grey Belt”.

This land is not previously developed, so it falls into the category of ‘other land.’ It is required for the purposes of a, b and d in NPPF (page 73), therefore it is not Grey Belt.

The Croxley Green Neighbourhood Plan (CGNP, adopted 2018) identifies the extent of the Green Belt surrounding Croxley Green and its importance to residents.

For example, in CGNP at 2.1.3:

*“Croxley Green is surrounded by countryside and greenery – fields, woodlands and marshy floodplain, mostly designated as Green Belt. Some of these areas lie within the parish, but most of them lie in adjoining parishes, to the south, west and north. These green areas provide a physical and visual buffer and help define the exclusive “village” feeling as well as being highly valued by the majority of residents. The main characteristic is of two storey houses set in residential roads many with glimpses of the open countryside which lies on all sides.”*

TRDC commissioned a strategic analysis of the Green Belt in August 2017. It concluded that the Green Belt fulfils its purpose.

A further study in 2019 ranked 152 parcels of land on a 7-point scale of very high, high, moderate-high, moderate, low-moderate, low and very low. This proposal site was ranked as moderate-high harm. Logically the sites identified as being moderate to very low harm should be brought forward first.

As a result of the recently revised NPPF, TRDC has to undertake a new Green Belt Review.

**Therefore, this application is premature and a decision should be deferred until Three Rivers District Council has completed its review.**

**Neighbourhood plan:** This application should be revised to take account of the Croxley Green Neighbourhood Plan

**Heritage Statement:** The development of the site will adversely affect the prospect of listed Durrants House and its iconic tower when viewed from footpath 17. A corridor between 4 storey buildings along the proposed 'Durrants View' will severely restrict the view of Durrants House. The development will not preserve the setting.

### **Density, Design and topography**

**Density of Housing:** The proposed density is markedly tighter than the existing adjacent housing, Front gardens of 2m (cf 5m nearby in Croxley), back gardens of 10m (cf 20m nearby in Croxley).

**Design code:** This advocates three storey buildings across most of the site, with many four storey buildings. This is out of character with the adjacent housing in Croxley Green. The code shows inappropriate examples of buildings taken from central London as design examples. Four storey Georgian buildings for example.

**Topography:** The whole assessment of the site seems to ignore topography. Parts of the site are comparatively level, others are quite steeply sloped. The site is visible from a number of directions, the proposed built form should be 3D modelled to show the visual impact.

### **Well being, sports & environment**

**Protected species** such as skylarks will be affected as noted by the applicant. The applicant also states that they have not carried out a study to find out which protected species exist across the site. Surely that must be done before an application is made.

**Street trees and road noise.** The proposed new cycle way along Links Way requires the inappropriate removal of many street trees. This will destroy existing residents' green amenities, which with the stated 5dB increase in road noise from traffic will reduce their quality of life.

**Sports facilities:** The report states that football and cricket fields in particular are under increasing strain. It also identifies significant overuse of grass pitches, with rising youth and female participation creating "urgent demand". No new pitch or court sports facilities are proposed. The expectation is that residents travel elsewhere in the area to participate in sports, creating additional car journeys.

**Community Facilities:** Falling school rolls and Hertfordshire County Councils five years projections suggest there is no need for a new school. The space allocated for a doctor's surgery is not large enough to take the expanded facility that is required, nor is there sufficient parking provided. There are already 8 halls available for community use in Croxley, so the need for a new one is not demonstrated. There are two local shopping centres within 15 minutes walk of the site, so the viability of two new retail units is not proved.

## Infrastructure

**Foul drainage:** The sewerage system is at capacity and cannot take any further discharge from this proposed site. As Thames Water asserted in their consultee comment, the development should not be approved until it is confirmed that the system's capacity can be suitably enlarged.

**Drainage strategy:** This says that the new roads themselves will take the excess surface water, presumably becoming a river over the road. We have seen instances in nearby Millside Grange where the unadopted roads have not been built to sufficient standards and gullies are raised not allowing water to escape into them.

**Net Zero:** There is no overall assessment of the energy demands associated with creating the buildings on site, the embedded carbon, or the energy requirements for the life of the buildings, to demonstrate how the proposed development will comply with net zero targets.

## Transport, Roads & Parking

**The Transport Assessment** and Travel Plan does not consider the impact of construction traffic ( or of providing for workers on site) or heavy vehicle movements on local roads. Baldwins Lane is already showing signs of structural deterioration and may require extensive reconstruction if it is used as part of the site access route for construction vehicles.

The transport assessment fails to take account of the development of Breakspeare School or the proposed redevelopment of Croxley House as a nursery.

The network analysis is deficient in only considering local network effects and impacts outside Croxley Green but not the impact on the main road network within Croxley Green.

The Transport Assessment contains inaccuracies and errors. The obvious ones give no confidence that the more technical parts are correct or appropriate.

**We note that Highways England recommend refusal based on the information provided to date.**

**The Travel Plan** is not sustainable. The site is a significant distance on foot from local facilities and public transport.

**We note that Active Travel England can not support the proposal for these reasons.**

The outline proposal is to bring a bus route to the site, but there is no evidence about the practicability in terms of diverting local services, the quality of local services, existing patronage, or the desired destinations from the new development.

**Parking:** The 2021 census shows that residents near the proposed site had approximately 170 vehicles (cars and vans) per 100 addresses. The local area is currently highly dependent on cars and vans for travel and transport. The proposed parking provision is inadequate. The 'centre' has too few spaces. The residential areas

have too few spaces. One only has to look at Durrants estate and Millside Grange to see that cars are parked on pavements because there is nowhere else to park.

**Therefore, the sustainability aspects of the travel plan and the transport assessment lack the substance required to be credible.**

## **Conclusion**

There have been over 650 objections from the local community to this proposal . It is clear there is strong resistance on planning grounds.

The site is open farmland and part of the protected green belt currently enjoyed by thousands of residents. It is not and does not meet the test of grey belt.

Traffic in the area will be adversely affected by the proposed development, and a sustainable transport plan has not been demonstrated.

Existing services: sewerage, water supply and electricity supply are not adequate to support the proposed development.

The proposed design, layout and density are out of keeping with the existing patterns in the area. Insufficient parking is provided.

There is no need for the proposed new school, NHS facility, community hall or retail units.

We therefore confirm our objection to the application.

If the officer is minded to approve, we request 'call in.'