

PLANNING STATEMENT ADDENDUM

Land To North Of Little Green Lane, Croxley Green, WD3 3SP

MNP-00123.C8671
October 2025

REPORT

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1 INTRODUCTION

- 1.1 This Planning Statement Addendum (the “Addendum”) has been prepared by RPS on behalf of Richborough in support of their Outline Planning application for residential development at Land to North of Little Green Lane (“the Site”).
- 1.2 It is intended to be read as an addendum to the Planning Statement which was submitted with the planning application in January 2025. Following discussions with the Case Officer, this report is intended to respond to changes in National Planning Policy (NPPF), Planning Practice Guidance (PPG), other evidence base reports and provide summaries of the responses to consultees through the course of the consultation.
- 1.3 Information previously submitted within the original Planning Statement has not been repeated.

Overview

- 1.4 An outline application (“this Application”) for the Site was submitted to Three Rivers District Council in December 2024 and was subsequently validated 16th January 2025 (ref. 24/2073/OUT). The description of development has not been amended during the course of the application and is as follows:

“Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for childrens 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 cafe 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. (Layout, scale, appearance and landscape as reserved matters).”

- 1.5 This application underwent an initial round of consultation in January – March 2025. Following this, consultation responses were received and some responses required action in the form of clarification or alteration to plans. A schedule of these changes is detailed next, listing the amended plans and reports that have been issued post submission. These revisions were subject to further statutory re-consultation, during which a number of minor issues were identified for amendment or resolution, it was agreed that certain matters would be further refined, some partially adjusted, and others identified as needing alternative solutions. It was agreed that a Planning Statement Addendum would be prepared to outline the rationale for any changes and to capture individual responses since the start of the application process whilst also reflecting upon the revised Planning Practice Guidance, which is now material for the determination of this scheme.

Revised Planning Application Documentation and Plans

- 1.6 The original Planning Statement set out a list of supporting documents and plans. This section sets out the changes to the application proposals and the number of direct and indirect changes that have occurred since the original submission, to aid cross referencing.
- 1.7 For completeness, the schedule below lists all of the planning application documents and explains where changes have been made and how these changes appear in the relevant documents.

Table 1-1 Submission Document Changes

Submission Document		Change Summary of changes made through the resubmission	Superseded / Amended Document (if applicable)
Plans			
Location Plan – CSA/4363/108	No	The application boundary remains unchanged from the initial submission version.	
Highway Access Plans T24544.001 T24544.002 T24544.003	Yes	The proposed junction layouts are designed to ensure safe and convenient crossings for pedestrians and cyclists, with the raised table design prioritizing active travel users over vehicle movements on minor arms. The shared footway/cycleway will be widened into the existing carriageway where necessary to achieve a minimum width of 3.0 meters and will have priority over Little Green Lane as it enters the site. Additional plans submitted for shared footway / cycleway and parking provision options on Durrants Drive. Additional planning submitted for vehicle tracking at site accesses.	Within amended transport assessment (dated 03 July 2025) T24544.001 (Rev E) T24544.002 (Rev D) T24544.003 (Rev F) T24544.004 (Rev B) T24544.005 (Rev C) T24544.015 T24544.016
Land Use Parameter Plan	No	The land use budget for the Site remains unchanged from the initial submission version.	N/A
Building Heights and Densities Parameter Plan	No	The building heights and densities parameters remain unchanged from the initial submission version.	N/A
Site Character Areas Parameter Plan	No	The character areas parameters plan remains unchanged from the initial submission version.	N/A
Access and Movement Parameter Plan	Yes	A dedicated link from the southwest corner of the site to Little Green Junior School. A link from the southeastern corner to facilitate a connection to Rousebarn Lane and onward to Croxley Danes School. A connection from the northeastern corner towards footpaths 017 and 031, which lead to Watford. The point of connection at the west of the Site, along Long Newland's Wood to connect with the PROW has been omitted due to the findings of the WRMR.	P24-1200_DE_0019_S1 Rev C Within amended DAS (dated 17 October 2025)
Phasing Strategy Plan	No	Plan remains unchanged from initial submission version.	
Landscape Strategy Plan I000010_DL02 Rev E (Appendix 11 within LVIA December 2024)	Yes	Minor amends to reflect revised drainage layout SUDs basins in response to the LLFA. Footpath to the western boundary with Long Newland's Wood has been removed, as above, due to the findings of the WRMR. RammSanderson have confirmed this alteration makes a negligible / imperceivable change to the BNG metric calculations.	I000010_DL02 Rev G

Submission Document	Change	Summary of changes made through the resubmission	Superseded / Amended Document (if applicable)
Illustrative Drainage Strategy (Ref 233574-BWB-ZZ-XX-D-W-0001) Revision P04 (Appendix 11 of SDS)	Yes	Updates incorporated following LLFA comments. Basins updated to reflect a Cv value of 1 in attenuation calculations, following further discussions with the LLFA.	Illustrative Drainage Strategy (Ref 233574-BWB-ZZ-XX-D-W-0001) Revision P06 Within response to LLFA - 233574-BWB-ZZ-XX-T-W-0005 LLFA
Illustrative Masterplan (within Design and Access Statement Rev A (January 2025))	Yes	In addition to dedicated pedestrian connection and linkages referenced above, the illustrative layout for the Local Centre has altered slightly to accommodate suitable parking allocation and the revised drainage layout in response to the LLFA.	Within Design and Access Statement Rev C Ref. P24-1200 DE_021_01E
Development Framework Plan	Yes	Minor changes in regard to the above.	Within Design and Access Statement Rev C

- 1.8 The table below details the documents submitted *after* the initial submission date (December 24, 2024) that represent a revision or update to previously submitted information, if applicable.

Table 1-2 Post Submission Reports

Date Submitted	Ref	Document Name	Summary of Changes	Superseded document (if applicable)
11 June 2025		Green Belt Assessment Addendum (March 2025)	Supplementary document providing additional information or clarification to the original Green Belt Assessment.	Addendum to Landscape and Visual Impact Assessment & Green Belt Assessment (Dated 24 Dec 2024)
09 July 2025	T24544 Rev C (Dated 03 July 2025) – superseded by Rev E	Transport Assessment	The Baldwins Lane/Links Way/Winton Drive junction was re-modelled as a staggered crossroad incorporating a pedestrian crossing near the school, addressing HCC comments.	Transport Assessment T24544 Rev A (Dated 16 Jan 2025)
09 July 2025	Rev V2 – (Dated 26 June 2025*)	Travel Plan	Multi-modal trip rates (walking, cycling, etc.) were obtained for residential development in response to ATE comments.	Travel Plan (Dated 16 Dec 2024) (Rev -)
09 July 2025	No ref. Submitted separately rather than as part of Transport Assessment	Transport Assessment Appendices	Revised residential trip rates acquired using the mixed private/affordable dwellings (Class 3M) subcategory.	Transport Assessment T24544 Rev A (Dated 16 Jan 2025)
20 August 2025	TN2	Technical Note – Impact on the SRN	Traffic distribution/assignment methodology was extended to nearby Strategic Road Network (SRN) junctions (M25 J18 & 19, M1 J5) at the request of National Highways.	None.

Date Submitted	Ref	Document Name	Summary of Changes	Superseded document (if applicable)
26 August 2025	Dated August 2025	Green Belt Addendum: Purpose A	Further justification of Purpose A assessment of illustrative features and other recent relevant appeals	None. Addendum to Landscape and Visual Impact Assessment & Green Belt Assessment (Dated 24 Dec 2024)
02 September 2025	TN3	Technical Note – All Modes Travel Demand	Multi-modal trip rates (walking, cycling, etc.) were obtained for residential development in response to ATE comments.	None.
08 September 2025	VRP2002 - RSA 1	Stage 1 Road Safety Audit	Request of Hertfordshire Highways for comment.	None.
09 October 2025	RSE_8239_R2_V2	Woodland Recreational Management Plan (Outline)	Outline measures which will mitigate these recreational and urban edge pressures on surrounding Ancient Woodlands	None.
24 October 2025	Rev C (October 2025)	Design and Access Statement	Updated drainage, pedestrian access points and access and movement strategy insofar as western PROW connection to Long Newlands Wood is concerned.	Rev A (January 2025)
24 October 2025	Dated October 2025	Green Belt Addendum: Green Belt Review Part 4	Critique of the methodology applied by Arup in preparing the Council's Green Belt Review Part 4 in regard to the Local Plan Review, published to Local Plan Sub-Committee on Wednesday 8 th October 2025.	None. Addendum to Landscape and Visual Impact Assessment & Green Belt Assessment (Dated 24 Dec 2024)
24 October 2025	Dated 09 October 2025, Ref 11702_R02e	Preliminary Arboricultural Impact Assessment	Updated report to reflect confirmed TPO order on site.	Dated 16 December 2024, Ref. 11702_R02_NC
24 October 2025	Dated 23 October 2025, Rev E	Transport Assessment	Vehicle tracking plans 'Strand 1' measures and costings of measures to be deferred to S106 discussions. Revised parking figures. Refer to ongoing discussions with Transport for London and National Highways. Construction traffic clarification (light vehicles / staff trips). Baseline data revised (LGV/HGV/PCU calculations) Missing trips corrected. Re-run of unction capacity assessments.	Transport Assessment T24544 Rev A (Dated 16 Jan 2025) T24544 Rev C (Dated 03 July 2025)

*Incorrectly stated on report

Statement Structure

1.9 This Addendum is split into the following sections:

Planning policy changes and implications

- 1.10 The Planning Statement (December 2024) provided a detailed overview of the national and local planning policies and guidance relevant to the determination of this planning application proposal. Since then, the emerging Local Plan's context has changed, and the updated Planning Practice Guidance has been published. Section 2 of this Statement updated the relevant policy context.

Response to themes and matters raised at Preliminary Planning Committee, statutory consultees (including Parish Councils) and public consultation

- 1.11 The key planning issues raised during the consultation period on the application are summarised in Section 3, with a response from the Applicant regarding scheme changes or further rationale in response to various consultees.
- 1.12 The Applicant has provided responses to or signposting to supporting documentation to matters raised by Councillors at Preliminary Planning Committee on 17th July 2025 and responses received by Parish Councils through the consultation period, set out in Section 3.

Conclusion (the case for development)

- 1.13 The final section of this Addendum revisits the conclusions of the original Planning Statement and updates the conclusions and planning balance considering the changes to the application proposals and the policy context.

2 PLANNING POLICY CHANGES AND IMPLICATIONS

National Planning Policy Framework (Dec 2024)

- 2.1 The previous Planning Statement supporting the application was reflective of the NPPF and its December 2024 update. On 7th February 2025, a subsequent revised version was published to correct cross-references from footnotes 7 and 8 and amend the end of the first sentence of paragraph 155 to make its intent clear. For the avoidance of doubt the amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024.
- 2.2 The NPPF remains a material consideration and has been taken into account in the proposed development.
- 2.3 Paragraph 155 was amended to state that: *“The development of homes, commercial and other development in the Green Belt should also not be regarded as **inappropriate where all the following apply:...**”*
- 2.4 The Applicant contends that this amendment presents no bearing on the proposals given the compliance with the requirements, ‘a’ to ‘d’ and the Golden Rules, are proposed to be adhered to in full.

Planning Practice Guidance (Feb 2025)

- 2.5 In respect of Green Belt Planning Practice Guidance, a new version of guidance to reflect the revised version of the National Planning Policy Framework 2024 was published 27 February 2025. The Green Belt Appraisal Addendum is reflective of this additional guidance and its implications for assessing whether land is grey belt.

Emerging Three Rivers Local Plan 2025-2041

- 2.6 Since the time the Outline application was submitted (December 2024), Three Rivers District Council has since undertaken further evidence base gathering and the initiation of a further consultation stage (Regulation 18 Part 5) for the Local Plan Review.

Timetable and Policy Shift

- 2.7 In January 2025, an Extraordinary Meeting of Full Council agreed that officers should work towards an accelerated timetable to publish the Regulation 19 draft Local Plan for consultation in early November 2025. This decision followed and effectively reverses the October 2024 committee decision to pause the plan for further evidence work.
- 2.8 The Local Plan is now being prepared against the 2024 NPPF and the updated standard method for calculating housing need.
- 2.9 The plan period has been updated to 2025–2041.

- 2.10 The new standard method has resulted in a requirement of 832 dwellings per annum (dpa), totalling 13,312 dwellings over the plan period. This represents an increase of 1,846 dwellings compared to the previous Regulation 18 consultation figures.
- 2.11 The residual housing target that needs to be met through site allocations is approximately 11,500 dwellings. This significantly higher target replaced the Council's previously preferred 'Low Growth' option (4,852 homes).
- 2.12 A recent ministerial letter (published 09 October 2025) concerning Green Belt policy¹, which we believe has a material impact on the context of the ongoing progress of the Local Plan review. This new ministerial guidance effectively reverses the direction set out in the March 2014 letter issued by the then Minister, Nick Boles². The Boles letter had strongly re-affirmed Green Belt protection by noting that unmet housing need was unlikely to outweigh harm to the Green Belt and other harm. The recent letter now provides Planning Inspectors (PINS), where necessary, with the option to recommend as part of any ongoing or forthcoming examinations that a Green Belt review is undertaken to consider whether additional sites could be identified, in line with national policy, to meet development needs. This change represents a material shift in the national policy context for Green Belt land where housing need is a concern, which is the case in Three Rivers District.

Regulation 18 (Part 5) Consultation

- 2.13 Following a review of the new sites in March 2025, the Council sought legal advice on whether to proceed directly to the Regulation 19 stage. Counsel³ advised, that while not strictly a breach of Regulation 18, proceeding without consulting on the new allocations carried a high risk of legal challenge or the plan being found unsound at examination.
- 2.14 The Local Plan Sub-Committee agreed in May 2025 to undertake an additional Regulation 18 consultation (Part 5) on the newly submitted sites and policies.
- 2.15 Richborough responded to the consultation.

Evidence Base Updates

- 2.16 Principally a revised Green Belt Review (Stage 4) (undertaken by Arup) has been instructed to assess which areas of the District now fell under the new definition of 'Grey Belt' and whether the development proposed in the plan would fundamentally undermine the remaining Green Belt. The Council considers the Green Belt Review to be an important piece of evidence work not just because of the potential policy and site assessment implications, but also because it needed to be completed before officers can judge the level of growth which might be accommodated within the District. The latter would help to inform the potential for removing sites based on their impact on the remaining

¹ [Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate \(October 2025\) - GOV.UK](#)

² [Local planning - GOV.UK](#)

³ James Neill of Landmark Chambers

or wider Green Belt. This in turn would have an impact on further evidence work and thus may also affect the timeline for the production of the draft Plan. In addition, the Urban Capacity Study was also being updated as part of the search for brownfield sites, and all of the site review work would be undertaken in-house by officers. Accompanying this Addendum is a response to Arup's Stage 4 Green Belt Review.

- 2.17 It should be noted that Members of the Local Plan Sub-Committee on 8th October 2025 did not endorse or recommend the Green Belt Review (Stage 4) be published onto the Council's Local Plan Review webpages. Instead, seeking a number of clarifications around the justification, and reference made to other appeal decisions in the District. It was agreed that Arup would be instructed to revise or draft an addendum to the Stage 4 Report, which would be brought back to Members for approval in the future.

Sarratt Neighbourhood Development Plan (Referendum Version)

- 2.18 In instances where the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, Paragraph 14 of the NPPF confirms additional protections apply to the presumption of sustainable development apply to applications involving the provision of housing, where the following apply:

*a. the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; **and***

b. the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).

- 2.19 Both criterion 'a' and 'b' must apply for paragraph 14 to be engaged, and for the situation to arise whereby the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits.

- 2.20 Regarding criterion 'a', the Sarratt Neighbourhood Plan, which is not yet 'Made', albeit potentially scheduled to do so later in 2025, and consequently criterion 'a' does apply, at the time of writing.

- 2.21 Regarding criterion 'b', the neighbourhood plan does not allocate land for residential development, clearly it does not contain sufficient policies and allocations to meet housing requirements. Criterion 'b' does not apply.

- 2.22 For this reason, Paragraph 14 of the 2024 NPPF is not engaged. For the reasons stated in NPPF paragraph 232, the Neighbourhood Plan, is not sufficiently advanced and only carries very limited weight at present.

- 2.23 Notwithstanding, this a policy assessment summary, is provided below to demonstrate how the proposals are in compliance with the Neighbourhood Plan, if it were made now without changes.

Table 2-1 Sarratt Neighbourhood Plan Policy Compliance Assessment

Policy Name and Reference	Policy Description/Aim	Assessment of Scheme Compliance
Policy 1: Development in Villages and Hamlets	Seeks to protect the character of the core village/hamlets and aims to prevent village extensions.	Policy 1 is effectively split into 3 parts; namely to respond to local context and historic character of core village of Sarratt, proposals on the edge of village or hamlets will only be supported where they meet identified local need and major applications to be comprehensively planned to prevent piecemeal development. RPS consider the policy has substantial conformity issues with the NPPF and should be given lesser weight in decision making. Namely, the Housing Needs Assessment undertaken by the Parish Council is dated January 2020 and fails to reflect upon the impact of the Government's Standard Methodology on calculating housing need for Three Rivers District Council and the neighbourhood plan areas within it. Furthermore, the Parish Council has not followed the recommendation of the Housing Needs Assessment which included seeking the views of Three Rivers District Council – in particular in relation to the quantity of housing that should be planned for, this is required by Paragraph 70 of the 2024 NPPF, which sets out: <i>"Where it is not possible to provide a requirement figure for a neighbourhood area [Fn33], the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority"</i>. An assessment is provided to each consecutive part: <i>"New development must accord with the principles of sustainable development outlined in the NPPF and TRDC Development Plan. To help achieve this, sustainable development that makes the use of previously developed land will be particularly encouraged. All new development must: • respond positively to its local context and • conserve the historic character of the core village of Sarratt and hamlets of Belsize and Bucks Hill."</i> Paragraph 13.11 onwards of the Planning Statement, sets out how the scheme and its associated benefits align with the three dimensions of sustainable development (i.e., social, environmental and economic). The design positively responds to the local context by adopting a landscape-led approach that proposes devoting roughly 60% of the site to public open space and the new Rousebarn Country Park, designed to provide a sensitive, open transition to surrounding Ancient Woodland and SSSIs. It is not considered the proposals have an impact upon the core village of Sarratt or the hamlets of Belsize and Bucks Hill. <i>"Proposals for development on the edge of the village and hamlets will only be supported where they are small scale and meet an identified local need, with priority given to previously developed sites."</i> Not relevant to this proposal. <i>"All major applications shall be comprehensively planned to prevent piecemeal development, having regard to the timely and coordinated provision of infrastructure, services, open space and facilities made necessary by the development. They shall also be accompanied by a statement of community engagement to detail how the local community has been engaged prior to any planning application being made"</i>

The proposals are compliant with this policy aspect. The scheme comprehensively plans to prevent piecemeal development by submitting an Outline Application encompassing all necessary components for up to 600 dwellings, including a one-form entry Primary School (with expansion land), a mixed-use local centre (featuring a GP Surgery/Medical Centre, community building, and retail), and substantial Public Open Space including the Rousebarn Country Park. The delivery of this infrastructure and services is secured through Heads of Terms/S106 planning obligations to ensure timely and coordinated provision. Furthermore, the application fulfils the requirement for community engagement by submitting a Statement of Community Involvement, prepared by Cratus Group, which details the pre-application consultation process, engagement activities (such as widely distributed leaflets and public-facing activity), and explains how community feedback informed the evolution of the masterplan and provision of facilities. This approach, informed by national and local guidance like the NPPF and the Three Rivers Council Statement of Community Involvement, ensures a cohesive, high-quality, and integrated development response

Policy 3: Heritage (Contextual Policy)	Aims to preserve and enhance the significance of heritage assets and their setting, including the protection of historic heritage and viewing corridors.	The development proposals respect and acknowledge the Listed Durrants House from a landscape perspective by incorporating areas of open space with 'Durrants View'. Although the site is near Grade II Listed Durrants House (40m away) and the Grade II Registered Park and Garden ("RPG") Cassiobury Park, impacts on heritage assets would be assessed have been assessed through the application to date and has been agreed with the Council's Conservation officer that there is no historic link between the RPG and the Site, but the Site does form part of the agricultural setting that contributes to the significance of the RPG. There is a thick tree buffer on the western edge of the RPG meaning there would be no views into the development from the RPG, although there is a degree of intervisibility between the two along Rousebarn Lane. In addition, the existing Ancient Woodland within the Site would be retained, and a wetland area and country park would sit on the eastern boundary of the Site adjacent to the RPG, providing a clear green buffer. This would mitigate the harm to the setting of the RPG to the extent that it would result in less than substantial harm at the lowest end of this spectrum.
Policy 4.1: Housing Mix	Requires a residential size mix of 50% three bedrooms, 30% two bedrooms, and 20% one bedroom, informed by the Sarratt Housing Needs Assessment 2020.	The scheme sought to be compliant with the market recommendations of the Local Housing Needs Assessment (2020), excluding the local centre flatted element. The design approach justifies increasing the proportion of smaller (2-bedroom) units by incorporating flats in the local centre, arguing this is appropriate given worsening affordability and stricter lending practices where households may only be in the market for a 2-bedroom flat. Housing Services have given general support for this application in principle, on the basis that 70% of the affordable housing to be provided is at social rent and the size of dwellings provided fulfils our current requirements. The Parish Council's own Housing Needs Assessment does not align with the latest identified need based on the current housing register and the family composition of customers in temporary accommodation provided by the Council, suggests the following updated preferred mix: 20% 1-bed units, 45% 2-bed units, 30% 3-bed units, and 5% 4+ bed units. The primary need is for 2-bed, 4-person units, as there is a significant demand for family-sized accommodation to ensure families in temporary housing are offered permanent, suitable properties in a timely manner, in any case support is received from Housing Services.
Policy 4.2: Accessible	Favours proposals including bungalows, accessible homes, and all types of self-	The proposed development delivers a very substantial benefit by providing 30 dwellings as custom and self-build dwellings due to acute local need. Furthermore, the masterplan aligns with

Homes/Self-Build	build properties (3 bedrooms or fewer), while removing Permitted Development rights for conversions to larger dwellings.	accessibility/adaptability standards, committing 10% of new homes to M4(2) standard (60 dwellings) and 10% of affordable homes to M4(3) standard (30 dwellings).
Policy 5.1: Affordable Housing	Requires development resulting in a net gain of 1 or more units to provide 40% Affordable Housing.	The proposal delivers 50% of the dwellings as affordable housing. This provision significantly exceeds the policy requirement, contributing positively to the acute housing shortage.
Policy 5.2: Affordable Housing Tenure Mix	Requires the Affordable Housing provision to usually split as 75% Social Rent and 25% First Homes or affordable shared ownership products.	The proposed affordable housing tenure mix is 70% Social Rent, 25% First Homes, and 5% Shared Ownership. The application notes this meets the Council's recommended mix. The applicant delivers 100% social rented housing as the rental portion of the affordable tenure mix, which is strongly encouraged by the Council.
Policy 5.3: Integration	Affordable homes must be integrated into developments (design, layout, location) to be tenure blind and indistinguishable from other homes.	The Design Code sets out that affordable housing will be provided in tenure blind clusters, dispersed across the site. Detailed design information will be secured at the Reserved Matters stage.
Policy 6: Biodiversity (6.1 & 6.3)	Requires all proposals to achieve a net gain in biodiversity (BNG), apply the mitigation hierarchy, and integrate ecologically beneficial planting.	The mandatory requirement for 10% BNG has been achieved and significantly surpassed for the scheme. The scheme achieves a biodiversity net gain of 71.38% Habitat Units and 49.88% Hedgerow Units. Avoidance and mitigation measures are incorporated in the EclA. Enhancement measures include installing bat, bird, and insect boxes, and creating hedgehog highways.
Policy 7: National Landscape (Contextual Policy)	Objectives support the National Landscape (Chilterns) and align with the Chilterns NL Management Plan.	Although the LVIA states the specific policy part dealing with the Chilterns National Landscape is not relevant to the site, the overall landscape approach emphasises improvement and conservation in line with the Sarratt Plateau Strategy. The Design Review Panel welcomed the landscape-led approach. The site is designed to retain and enhance existing open and natural spaces.
Policy 10: Car Parking (Contextual Policy)	Requires adequate provision for parking and road design to be in keeping.	The scheme uses emerging Local Plan standards which reflect modern census data and focus on promoting sustainable transport. This lower provision is supported by a reasoned justification to facilitate the target density and cohesive scheme design, given the site's accessibility. The proposed level of parking for residential and commercial uses is justified based on the development proposals, despite a shortfall compared to older standards.

3 RESPONSE TO THEMES AND MATTERS RAISED AT PRELIMINARY PLANNING COMMITTEE, STATUTORY CONSULTEES (INCLUDING PARISH COUNCILS) AND PUBLIC CONSULTATION

3.1 Response to themes and matters raised by Statutory Consultees (including and Parish Councils), Members at Preliminary Planning Committee, and Public Consultation Key planning issues raised, largely through comments raised by statutory consultees during the consultation period on the application can be summarised as follows:

- i) Housing and Community
- ii) Infrastructure and Utilities
- iii) Environmental Protection
- iv) Ecology
- v) Transport and Accessibility
- vi) Heritage
- vii) Green Belt
- viii) Sports Provision
- ix) Crime Prevention through Environmental Design
- x) Housing Mix

3.2 Each planning issue is addressed in turn below.

3.3 For the avoidance of doubt, it is considered that these key issues relate to the concerns raised by consultees such as Croxley Green Parish Council, Sarratt Parish Council, CPRE and Third Parties (i.e., members of the public through public consultation), where an individual response has not been prepared as a standalone letter to date. The following points are considered to address the main concerns raised. A brief summary of concerns raised are provided below, followed by a response from the Applicant.

Housing and Community

3.4 Comments have been raised in respect of the need for market and affordable housing provision, NHS medical provision, Community Use Agreements and Public Open Space.

Housing

3.5 Comments from Housing Services through the course of the application consultation have been positive, with general support for the application in principle, on the basis that 70% of the affordable housing to be provided is at social rent and the size of dwellings provided fulfils our current requirements.

- 3.6 Various third parties have raised comments regarding the 'lack of need for housing'. In response the Applicant wishes to reiterate that the Council cannot demonstrate a five-year supply of housing land as required by the NPPF. Only a 1.9-year housing land supply exists. This is a very serious shortfall. The most recent Housing Delivery Tests have been failed by a wide margin. The delivery of affordable homes has been well below what is required. The Council accepts there is a significant and pressing need for affordable housing. This position was echoed in the Sarratt appeal decision in May 2024⁴. It should also be noted that a new Local Plan is a long way off reaching adoption, in any event the new the Council needs to identify sufficient land to accommodate in excess of 8,000 additional homes beyond those already identified in the new Plan up to and including the Part 4 consultation.

Health Care Provision

- 3.7 Comments have been raised by the NHS Integrated Care Board ("ICB") that new health infrastructure in the form of on-site provision for a new medical facility will be needed to accommodate additional patient numbers arising from this development.
- 3.8 NPPF Paragraph 101 states that *"public service infrastructure such as health... local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development."*
- 3.9 In this instance, there are significant and wide-ranging material planning considerations that should be taken into account in making a determination on the proposed development. These material considerations arise from the scope of the proposal, which will have wider associated health and public benefits that would arise from the construction of the development.
- 3.10 Overall, it is considered that the NHS ICB's response is broadly positive, and the Applicant is seeking ongoing engagement between all parties, including the Local Planning Authority, to begin preparation and negotiation on a package for a S106 agreement.

Community Use Agreements

- 3.11 Comments have been raised by two consultees, namely Sport England and Three Rivers District Council's Leisure Team that the application should be accompanied by a Community Use Agreement to secure the use of sports facilities on the school site for local sports clubs.
- 3.12 The applicant is generally supportive of a community use agreement. However, this is a matter that the local education authority would ultimately need to advise on as such a Community Use Agreement could potentially restrict the community use of the school if it decides to lease its premises for other activities.

⁴ APP/P1940/W/22/3311477 & APP/P1940/W/22/3311479

- 3.13 It is understood that for academies, the standard agreement with the Secretary of State mandates that the school must make its facilities available to other schools and the local community.
- 3.14 As indicated above, the Applicant is willing to be guided by both the Local Education and Local Planning Authority as to whether or not a Community Use Agreement is appropriate here.

Infrastructure and Utilities

- 3.15 Initially, on February 7, 2025, following a consultation received on January 21, 2025, Hertfordshire County Council as the Lead Local Flood Authority (LLFA) raised some concerns to the application, relating to the drainage strategy. Specific issues highlighted included the lack of calculations for all rainfall return periods up to and including the 1% Annual Exceedance Probability (AEP) plus appropriate climate change allowance, and the use of correct parameters such as FEH2013/FEH22, a CV value of 1, and 10% urban creep. Furthermore, the LLFA noted that the masterplan drawing lacked sufficient detail, with swales not appearing to connect to the drainage system and no clear outfall for the basin. There was also a concern that the proposed Sustainable Urban Drainage Systems (SuDS) might increase the risk of flooding elsewhere, and that the development was not in accordance with National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), or local policies like Three Rivers SFRA Level 2.
- 3.16 In response to these concerns, the Applicant submitted updated documentation on April 8, 2025. The Applicant detailed how each point raised by the LLFA had been addressed:
- Regarding freeboard and design flood levels, it was clarified that the site's distance and elevated topography relative to Flood Zones made a specific design flood level calculation for fluvial sources unnecessary, with the lowest development level already above anticipated surface water levels.
 - The infiltration drainage design was confirmed to include an appropriate Safety Factor of 5, and calculations demonstrated that the half drain down time for both catchments (941 mins and 852 mins) was less than the 24-hour requirement, negating the need for an alternative design or mitigation.
 - Calculations for surface water attenuation were confirmed to have capacity for the 1 in 100-year +40% climate change event, with further detailed network calculations to be secured by condition at the detailed design stage.
 - Urban creep of 10% for residential areas was explicitly included in the impermeable area calculations, and the latest FEH22 rainfall data and a CV value of 1 were used in the updated drainage calculations.
 - The Illustrative Drainage Strategy was updated to clearly show connections between SuDS features and flow pathways, clarifying that an infiltration-based solution does not require a formal.

- An Operation and Maintenance Plan for SuDS features was included, with responsibility for maintenance proposed to be secured by condition.
- Vehicular access routes to infiltration basins were added to the updated drainage strategy, with swales accessible via public areas.
- Plans for temporary measures, phasing, and construction phase water management were proposed to be secured by appropriately worded conditions due to the outline nature of the proposals, with infiltration basins anticipated in the first construction phase.

3.17 Following a review of the Applicant's updated documentation, the LLFA issued a second formal response on May 14, 2025, stating that the updated details are in accordance with NPPF and local planning policy Three Rivers SFRA Level 2. Consequently, the LLFA is now supportive of the application proposals subject to planning conditions being attached to any planning consent. Conditions to which the Applicant has no objection to and accepts. These conditions ensure that detailed designs, further infiltration testing, comprehensive modelling calculations, emergency spillways, maintenance plans, and construction phasing plans for surface water management will be submitted and approved at the reserved matters stage or prior to construction.

Environmental Protection

Green Spaces

3.18 Comments have been raised by Natural England, regarding the provision of green space (new country park) and for this to be secured with an appropriate management plan / maintenance for the lifetime of the development.

3.19 The proposed country park and associated amenity open spaces are considered significant and do enhance the scheme and improve views towards Durrants House. Two main areas of open space are proposed. The first runs around the north and east of the development envelope, creating a new country park and buffer to the existing woodland assets within and around the site. The second divides the development envelope, creating a green link to the country park and viewing corridor towards Durrants House listed building. This is set out in the Design and Access Statement (page 58) and the Landscape and Visual Impact Assessment (page 21).

3.20 Based on the land use parameters plan, the following open space typology is proposed:

Open Space Typology	Hectare provision
Nature & Semi-natural greenspace	19.51ha
Amenity greenspace	3ha
Parks & Gardens	2ha
Provision for children & young people	0.83ha
Allotments	0.27ha
Total open space	25.51ha
Total site area	40.7ha

- 3.21 As set out within the LVIA, there is no landscape or visual reason why development at the Site would be unacceptable, and the Site is capable of being developed in line with the proposals.
- 3.22 The Applicant considers that a management plan / maintenance plan can be secured by a suitably worded condition.

Ecology and Nature Conservation

Ancient Woodland and Veteran Trees

- 3.23 Comments have been raised by several consultees regarding the impact on trees, particularly ancient woodland and veteran trees.
- 3.24 The Woodland Trust, Forestry Commission and the Tree Officer have raised concerns regarding the potential impact of the proposed development on trees, particularly ancient woodlands and veteran trees. The Woodland Trust raised concerns to the application due to the potential deterioration of several identified ancient woodlands, including their own sites like Dell Wood and Newland's Spring Wood,
- 3.25 Similarly, the Tree Officer highlights that the site is in the Metropolitan Green Belt and contains ancient woodland. They also note the presence of notable and/or veteran field and hedgerow trees on site, as well as protected ancient woodland bordering the site. The Tree Officer also points to the risk of increased pollution and anti-social behaviour, and the potential for overzealous safety work on veteran trees due to their proximity to development.
- 3.26 Following detailed consideration of all the points raised, a Woodland Recreational Management Report (Plan) (Outline) ("WRMR") has been prepared by RammSanderson Ecology Ltd on behalf of the Applicant and submitted to the Council in October 2025. This sets out the position regarding the potential effects of the residential development (the Scheme) on surrounding Ancient Woodlands.
- 3.27 The fundamental objective is to specify outline measures which will mitigate these recreational and urban edge pressures on surrounding Ancient Woodlands. These 'pressures' include issues such as trampling of sensitive vegetation, soil erosion and compaction, increased anti-social behaviour (vandalism, arson, fly-tipping), disturbance of wildlife, and pet predation.
- 3.28 Mitigation measures are split into two categories:
- Onsite Mitigation Proposals: Measures that can be directly controlled, funded, and managed long-term by the Planning Applicant (or Management Company) and secured by TRDC (the Planning Authority) through standard planning obligations. These are intended to be secured by planning condition and commuted sums at the Reserved Matters stage.
 - Offsite Mitigation Options: Options predominantly for adjacent Ancient Woodland (specifically Dell Wood and Long Newlands Spring Wood) which would require indirect funding by the Planning Applicant and securing through a legal agreement (like a Section 106) and liaison with the landowners (e.g., the Woodland Trust).

- 3.29 The following responses are set out to each of comments received from the Woodland Trust, Forestry England and the TRDC Principal Trees and Woodland Officer.

Table 3-1 Woodland Consultee Response and Application Response / Position

Consultee	Primary Concerns Addressed	RammSanderson Response/Position
Woodland Trust (WT)	Deterioration of Dell Wood: Cited existing "significant deterioration," anti-social behaviour, and compacted bare ground, arguing the development scale and mitigation were inadequate. WT objected on the basis that no robust, evidence-based assessment of intensification was provided.	RammSanderson acknowledged the WT's insights, noting that "significant deterioration" appeared largely confined to the large hollow (dell) identified during the site scoping visit. RammSanderson argued that detailed visitor modelling is not required at this outline stage, and resources are better spent on consultation and site visits. The WRMR itself provides the requested impact assessment and outline mitigation framework.
	WT noted Green Lane Wood was proposed for a 30m un-encroached buffer while Dell Wood was proposed for 15m un-encroached plus 15m encroached, questioning the unequal protection.	RammSanderson clarified its understanding, based on advice from Tyler Grange, that both woodlands will receive a minimum 30m development buffer zone , which can be secured via the Land Use Parameters Plan. It was stated that buffers are not intended to be the sole deterrent and welcomed further dialogue on buffer enhancement.
TRDC Officer	Concerns over long-term deterioration due to recreational/anti-social pressures (compaction, trampling, vandalism, fly-tipping). Recommended managing visitor access and employing a funded ranger team or on-site maintenance staff to respond quickly to issues.	RammSanderson confirmed that the impacts identified by the TRDC Officer were recognized and used as the baseline for designing outline mitigation solutions. Long-term management and maintenance, including staffing, are planned to be funded by the Planning Applicant and further agreed upon through dialogue with TRDC and the WT.
Forestry England (FE)	Concerns regarding the adequacy of the buffer for a large 600-dwelling development (suggesting the minimum 15m buffer is more suited to a single dwelling). Also concerned about the fragmentation and isolation of Green Lane Wood and noted the inclusion of amenity public open space within the buffer zones.	RammSanderson stated that the Standing Advice does not define the 15m buffer as being suitable only for a single dwelling. It maintained that the proposed buffer zones, along with the mitigation solutions presented, are sufficient. Regarding fragmentation, RammSanderson disagreed that Green Lane Wood would become "completely isolated" as it is currently surrounded by low-biodiversity arable cropland. Conversion of this land to species-rich grassland would be a significant enhancement. FE's suggestions for increasing habitat connectivity will be explored during detailed design.

- 3.30 The Applicant contends the overall conclusion is that the WRMR provides a robust framework for detailed mitigation design which should be conditioned and finalised at the Reserved Matters stage, through a combination of hard deterrents, access management, onsite management, offsite support and long-term funding options.

Red Kite Surveys

- 3.31 Hertfordshire County Council Ecology Officer proposed that nesting bird surveys for red kites should be carried out prior to determination.
- 3.32 The Ecological Impact Assessment (EclA) submitted with the application demonstrated and clearly stated that red kites were identified as 'probably nesting' within Green Lane Wood LWS in 2024, located in the eastern portion of the site (also illustrated on Figures 8a-d). Whilst no direct evidence of an active nest was identified, a pair of red kites were observed exhibiting nesting behaviour over the Green Lane Wood LWS during each survey walkover, hence the 'probably breeding' classification.

- 3.33 Section 4.10.2 of the EclA clearly identifies potential disturbance impacts to red kites because of construction but also concludes that the potential for disturbance to red kites and its relative magnitude would be significantly influenced by several variables, including the specific location of the nest site relative to construction activities. The EclA goes on to recommend pre-construction surveys for red kite to inform further mitigation measures (such as construction buffer zones), the detail of which should be captured in a CEMP and secured by planning condition *‘when more detail would be known of likely construction start dates and the build programme’* (my emphasis).
- 3.34 In response to the comments, it is understood that construction is unlikely to start until 2027 at the earliest, therefore, undertaking red kite surveys in 2025 prior to determination, as requested by HCC, will have no merit in informing potential mitigation measures which will be required two years later. It is vital that the red kite surveys are as current as possible to accurately inform mitigation measures.
- 3.35 HCC later confirmed “that completing pre-commencement red kite surveys will be sufficient. The results of the survey can be included in the already conditioned CEMP, along with any mitigation outlined by the ecologist.” The Applicant is in agreement with this.

Transport and Accessibility

- 3.36 The transport strategy for the Site has been refined through detailed engagement with key stakeholders including Hertfordshire County Council (HCC), National Highways, Transport for London (TfL), Active Travel England (ATE) and local resident comments regarding the impact of increased traffic congestion on local roads and safety. Those matters that have been concluded (or agreed) to date are not duplicated here.

Strategic Road Network – National Highways

- 3.37 In response to technical feedback from National Highways, a further Technical Note (TN2) was submitted to form an update to the Transport Assessment, updated to include expanded traffic modelling of the M25 and M1 junctions (refer to table 1-2). The findings have been agreed with National Highways insofar as J18 M25 at the time of writing. Further modelling work is being carried out in respect of J5 M1. A further technical note will be submitted in due course.

Traffic Data & Modelling - Hertfordshire County Highways

- 3.38 Hertfordshire County Council as the Highway Authority provided a response to submitted information on 9th July 2025 (refer to table 1-2). In response, the Highway Authority was unable to access the results of the Transport Assessment due to errors in the underlying data and calculations. Furthermore, it was requested a Road Safety Audit for the proposed access points and pedestrian/cycle routes be submitted. In response, the Applicant has submitted a draft Road Safety Audit for comment, and a further revised version of the Transport Assessment (Rev E).

Improved Station Access – Transport for London

- 3.39 The applicant is open to discussion with TfL towards a potential and reasonable financial contribution towards TfL's potential delivery of step-free access at Croxley Underground station, provided it fulfils the relevant CIL 122 and 123 Regulations.

Travel Plan, Route Audit and Accessibility – Active Travel England

- 3.40 Active Travel England first responded to the application on 11th February 2025 requesting various information regarding trip generation and travel plan targets, in addition to an active travel route audit. Following receipt of the Transport Assessment (V2, 09 July 2025), Active Travel England responded on 28th July 2025, confirming that they could recommend conditional approval for the application.

Heritage**Heritage Assets**

- 3.41 Comments were raised by the Conservation Officer regarding the impact of the setting of Durrants House (dated 19th February 2025).
- 3.42 The applicants Heritage advisors Pegasus submitted a response on 28th March 2025 which established the suitability of the proposals which delivery of a high-quality development whilst seeking to minimise the adverse effects of the proposal upon the setting of the two adjacent heritage assets. The report addresses the following:
- The green corridor, as proposed, is c. 50m wide at its narrowest point and c. 55m at its widest point. The LEAP is deliberately located near to the proposed Local Centre on the basis of community benefit and is situated near to the southern edge of the site as this means it is effectively screened from Durrants House by the existing hedgerow on the north side of Little Green Lane.
 - The introduction of tree planting in the vicinity of the LEAP was conceived of as a direct design response to a small parcel of orchard recorded at this location on historic Ordnance Survey maps.
 - The height of the development flanking the green corridor was discussed with the independent Design Review Panel, during the scheme development. It was felt that having the buildings at this location framing the view would reinforce the link between the rear of Durrants House and Whippendell Wood (including the views from PRoW 17) as they would lead the eye along the green corridor.
- 3.43 The adverse effect upon the setting of Durrants House was addressed in the Heritage Assessment as being Less than Substantial Harm at the lower end of the spectrum as the contribution of the site to the significance of the asset is very limited

- 3.44 It is noted that the Council's Historic Environment Team responded on 19th February 2025, confirming their view that *In NPPF terms the degree of harm would be less than substantial and as per paragraph 215 this harm should be weighed against the public benefits of the proposal.*"

Green Belt

- 3.45 A number of comments have been raised by various consultees in regard to Green Belt, such as Sarratt Parish Council, Croxley Green Parish Council, CPRE and third parties. Through these comments it is argued that the Site should not be considered Grey Belt and disputes the Applicant's assertion that the site constitutes Grey Belt.
- 3.46 The Applicant has sought to update the Site-Specific Green Belt Assessment. The Addendum (submitted 11th June 2025) produced provides an updated assessment of the Green Belt contribution of the land north of Little Green Lane, Croxley Green, following the publication of additions to the Green Belt Planning Practice Guidance (PPG) in February 2025.

Grey Belt

- 3.47 The Green Belt Addendum directly addressed the Grey Belt argument, which was a point of contention for CGPC, SPC and CPRE. It conducts a reassessment of the site against the three purposes (a: checking sprawl, b: preventing towns merging, d: preserving historic town setting) based on the updated PPG and illustrative features that effect the performance of a contribution level.
- 3.48 The Addendum concludes that the site makes a "moderate" contribution to purposes (a) and (b), and "no" contribution to purpose (d). Therefore, it argues that the site "does not strongly contribute towards purposes a, b or d" and thus comprises grey belt land. This directly counters CGPC and SPC's argument that the site is not Grey Belt.
- 3.49 An additional note regarding Purpose A was submitted in August 2025, which sought to illustrate the fact that the proposed development will not appear as an extended 'finger' of development, nor incongruous in relation to the existing development pattern, we produced a Figure Ground Plan.
- 3.50 It notes the site is physically and visually well contained due to its position on the edge of Croxley Green and the adjoining woodland, suggesting that its development would not materially affect the wider Green Belt beyond.
- 3.51 It is noted the Council as part of its Local Plan evidence base work, has recently published a report by Arup's (Stage 4 Green Belt Review - September 2025) which looks at what it considers to be potential Grey Belt land parcels in the district. The report has been assessed by Iceni - refer to Table 1-2 – which has been submitted formally as part of this application. Iceni strongly disagree with its findings and methodology. The Arup assessment indicates in their view that the Site does not constitute Grey Belt, considering it strongly contributes to Purpose A.
- 3.52 Iceni, on behalf of Richborough, very strongly refute Arup/TRDC's assessment of the site, pointing out the very significant methodological flaw in Arup's assessment, where for Purpose A, the report

simply ignores national guidance from the PPG, not least as it makes no mention of physical features which could contain development. Put simply given the woodland to the north, west, east and existing development to the south means the site is exceptionally well contained by existing features and can in no way be considered to contribute strongly to Purpose A.

Sports Provision

- 3.53 Sport England provided comments in their initial formal response dated 7th February 2025, relating to the need for more detail regarding proposals for outdoor and indoor community sports provision. Specifically, Sport England requested a formal community use agreement for the primary school's sports facilities, a planning condition to ensure Active Design principles were considered in reserved matters applications, certainty on the scope and level of financial contributions for off-site sports provision, clarity on the NewGen Active Track (or 'Trim Trail') in the country park and its security through a planning obligation, and consideration of designing the community hall for formal sports use with a minimum specification to potentially reduce off-site contributions.
- 3.54 In response to these comments, the Applicant, provided a detailed letter on 22nd May 2025, which amongst other matters confirmed a 'Trim Trail' in the Design and Access Statement, and the applicant proposed a specific condition to secure its design and implementation at the reserved matters stage. For the community hall, the applicant proposed a minimum external floorspace of 695 sq. metres and committed to an "either/or" clause in the Section 106 agreement: either delivering an on-site facility meeting Sport England's minimum dimensions and design guidance (including 18x10m hall and 12x9.1m studio, both with 3.5m clearance height), or providing an off-site financial contribution if on-site delivery proved unfeasible or unviable.
- 3.55 Following these responses, Sport England reviewed their position and, in their letter dated 28th May 2025, confirmed they had no objection subject to the agreed matters being formally addressed. Specifically, Sport England withdrew their request for a community use agreement for the primary school, supported the imposition of the Active Design condition, supported the proposed financial contributions towards off-site sports facilities subject to their inclusion in a Section 106 agreement, and withdrew their objection regarding the NewGen Active Track (Trim Trail) and the community hall, provided the suggested conditions and specifications are included in the Section 106 agreement. Therefore, there remains no outstanding objection from Sport England.

Crime Prevention through Environmental Design

- 3.56 Hertfordshire Police responded to the Application regarding matters of crime prevention and security. This application is submitted in outline, meaning only matters of access are for detailed consideration. However, the application is accompanied by an illustrative masterplan and other associated parameter plans which suggests a form of development, possible buffers between development and existing properties. The new homes will be designed to front onto the areas of open space, to create an attractive aspect and to provide passive surveillance, thereby aiming to create continuous activity throughout the day and evening, thereby discouraging criminal activity by

increasing the risk of detection. In the event Outline planning permission was granted, impact of safety and security would be fully assessed at reserved matters stage when the detail is available. Based on the Preliminary Committee Report prepared by Three Rivers District Council, it is likely a condition would require that subsequent Reserved Matters accord with the Land Use Parameters Plan, and others.

- 3.57 In addition to the DAS, the supporting Health Impact Assessment (HIA) notes that the design principles include "designing out crime". The HIA highlights that "Integrating affordable housing ensures a diverse community, promoting inclusivity and equality. Diversity may lead to a stronger collective identity in the existing and new community" [paras. 120, 124]. Strong community identity and cohesion are key factors in creating safer places. The design of the Proposed Development would also "reduce the risk of social isolation through integration with the existing community" [para 104]. The documents directly link design features to alleviating the fear of crime, as seen with pedestrian street lighting [para 147]. We consider that crime prevention and security have been extensively considered and integrated into the design principles for this development, as far as is possible for a scheme where detailed matters are reserved. The level of detail includes adherence to established best practice guidance, specific architectural and layout strategies (like natural surveillance and perimeter blocks), and a sensitive approach to housing mix to foster a cohesive and inclusive community. These measures directly aim to mitigate the very concerns you raised about the long-term liveability, fear of crime, sustainability, and potential burden on emergency services.
- 3.58 Following a meeting on 21st August with Hertfordshire Constabulary Design Out Crime Officer ("DOCO"), it was agreed that the scheme has addressed a number of 'Crime Prevention through Environmental Design' principles and was considered appropriately. On 22nd September 2025, the DOCO confirmed support for the application that security measures had been considered and can be implemented.

Response to Members of the Planning Committee

- 3.59 The applicant has provided responses to or signposting to supporting documentation to matters raised by Councillors at the preliminary planning committee on 17th July 2025, for the subject application, and responses received by Parish Councils through the consultation period. It clarifies how these points have been addressed in the submitted planning application documents.

17th July Planning Committee

- 3.60 At the meeting, councillors raised concerns regarding the proposed development. The following section addresses each point by referencing the relevant submitted documentation.

Councillor Mitchell

- 3.61 **'Grey Belt' Status and Speculative Nature:** Questioned if the site could truly be considered 'Grey Belt' and if the application was speculative.

- Response: The application's Green Belt Addendum (paras 114-125) provides a detailed assessment of the site's contribution to Green Belt purposes, concluding it is 'Grey Belt'. The Planning Statement (paras. 5.7-5.32) further explains this methodology, confirming that the site meets the appropriate tests and doesn't require a justification of 'very special circumstances' under NPPF paragraph 153.

3.62 **Access Issues:** Considered 'very serious' access issues.

- Response: The Design and Access Statement details the two vehicular access points from Little Green Lane with new 'Copenhagen Style' junctions designed for safety. The Transport Assessment (paras 6-6.54, 8.11, 8.13) details traffic generation and distribution, concluding the development will not create unacceptable impacts on highway safety. The final design of these access points is a reserved matter for full consideration in this outline application.

3.63 **Sewage Treatment Capacity:** Concerns were raised about the existing sewerage system's capacity.

- Response: Thames Water has been consulted and indicated the schemes suitability subject to conditions that require either all necessary upgrades to be completed prior to occupation, or an agreed development and infrastructure phasing plan. The Planning Statement (para 4.24) acknowledges these findings and confirms consultation is ongoing with Thames Water.

Councillor Lloyd

3.64 **Sewage Point:** Cllr Lloyd echoed the concerns about sewage capacity.

- Response: See above to Cllr Mitchell.

3.65 **Traffic Impact Locally, Focus on Highways:** Cllr Lloyd noted a significant traffic impact locally and stressed the need to focus on highways matters.

- Response: The forthcoming Transport Assessment (V3) is currently being prepared and looks to deal with the Hertfordshire Highways comments regarding traffic data and modelling. It is not anticipated that the development will not have a material impact on the operation of the local highway network nor an unacceptable impact on highway safety in NPPF terms.

3.66 **Clear Dust Plan and Wheel Washing:** Cllr Lloyd requested a clear dust plan and mentioned concerns about dust impact on residents and the need for wheel washing.

- Response: The Air Quality Assessment recommends mitigation measures for construction-phase dust. The Environmental Health Officer has reviewed this and recommends a condition requiring a dust management plan as part of the standard Construction Environmental Management Plan (CEMP) – refer to Preliminary Committee Report, paras. 9.15.1, 9.19.1, Condition 3.

Councillor Cooper

3.67 **Harm to Green Belt:** The councillor sought specific evidence regarding 'very significant harm' to the Green Belt and the discussion on 'Grey Belt' status.

- Response: See response to Cllr Mitchell's 'Grey Belt' concern.

3.68 **NPPF Exemption:** The councillor questioned if the scheme would fit within the NPPF paragraph 154b exemption for recreational facilities.

- Response: The Preliminary Committee Report (para 7.1.9) notes that the proposed development, as a whole, does not fall into categories a, c, d, e, f, or g of NPPF paragraph 154. Regarding category b, it states that the country park and play/recreation areas may not be inappropriate if they preserve openness and do not conflict with Green Belt purposes.

Councillor Drury

3.69 **School Need and Objections:** The councillor noted objections from local schools, citing falling pupil numbers and questioning the need for a new school.

- Response: The Education Report, submitted with the application, addresses the need for the on-site primary school. Hertfordshire County Council (HCC) acknowledges the applicant's proposal for a new 1FE (up to 2FE land) primary school on-site to accommodate needs arising from the scheme.

3.70 **School Land Use:** The councillor asked if the land reserved for the school could be used for homes if the school isn't needed.

- Response: This would depend on the transfer of the land to HCC and associated covenants.

3.71 **School Site Suitability:** The councillor stated the proposed school site is not flat and unsuitable for sports pitches.

- Response: The proposed school site will be made appropriate for its intended purpose and the Sports and Leisure Strategy acknowledges that on-site provision of traditional pitch sports (football, cricket) was explored but concluded not feasible due to topographical, landscape, and highways considerations and off-site financial contributions were more appropriate, as supported by Sport England.

3.72 **Open Space and Woodlands:** The councillor raised concerns about the need for open space and the impact on nearby woodlands.

- Response: The development proposes 20.51 hectares of public open space, including a country park and play areas. The Ecological and Biodiversity Impact Assessment (EcIA) confirms that no ancient woodland will be lost and a 30m buffer has been implemented from built development to Green Lane Wood. Additionally, a Woodland Mitigation Strategy has been submitted in October 2025, as summarised above.

Councillor Morris

3.73 **Parking Shortfall:** The councillor noted a shortfall of 83 spaces based on current Local Plan standards and wanted more detail on parking.

- Response: The **Transport Assessment** has justified the proposed level based on the development's characteristics and its encouragement of active travel, and this is agreed with Hertfordshire Highways. Parking provision will be finalised at the Reserved Matters stage.

Councillor Whateley-Smith

3.74 **Roads and Pavement Parking:** The councillor expressed concern about narrow, unadopted roads leading to pavement parking and blocked cycling routes.

- **Response:** The **Design and Access Statement** outlines a street hierarchy and movement strategy to create safe and accessible routes for all users, with an emphasis on pedestrian and cycle priority. All routes will be designed to adhere to highway design standards.
- **Officer Attendance:** The councillor requested that officers attend the site visit. **Response:** The committee unanimously agreed to note the report and for officers to arrange a site visit.

Councillor Sian

- 3.75 **Road Capacity:** The councillor raised concerns about the capacity of surrounding roads.
- **Response:** The **Transport Assessment** provides detailed modelling of the local highway network and proposes ongoing discussions with authorities to consider mitigation.
- 3.76 **Pedestrian/Cycle Safety:** The councillor welcomed better pedestrian and cycle routes but was concerned about safety and a lack of safe crossings.
- **Response:** The **Transport Assessment** (V2) highlights pedestrian and cycleway connections throughout the scheme. A Road Safety Audit has been published and is awaiting feedback from Hertfordshire Highways.
- 3.77 **GP Surgery Pressures:** The councillor raised concerns about GP surgery pressures and the need for a larger facility.
- **Response:** The development includes provision for new NHS health and social care services. The **Health Impact Assessment (HIA)** details ongoing discussions with the Hertfordshire and West Essex Integrated Care Board (ICB) to determine the specific services, with the ICB supporting the principle of a new medical centre.
- 3.78 **Overdevelopment:** The councillor was concerned about general overdevelopment and a significant cumulative impact on Croxley Green.
- **Response:** The **HIA** includes a qualitative cumulative assessment, concluding that no significant cumulative effects on health and social care services or housing have been identified. The **Planning Statement** asserts that the proposed 600 dwellings represent a meaningful contribution to meeting the district's housing shortfall.

Councillor Hearn

- 3.79 **School Land Alternatives:** The councillor asked if the land reserved for the school could be used for other benefits if a school isn't needed.
- **Response:** The application is for an Outline Planning Permission with reserved matters, allowing for flexibility in the final design. The **Design and Access Statement** indicates the design can adapt to changing educational needs if required. Its reservation would be a matter for the S106 Agreement.

Guy Parks (Croxtley Green Parish Council)

- 3.80 **Sports Provision:** Mr. Parks stated that residents would need to travel by car for sports due to a lack of on-site provision.
- **Response:** The **Sports and Leisure Strategy** acknowledges that on-site pitch provision was deemed unfeasible. Instead, it proposes financial contributions for off-site improvements, and **Sport England** has removed its objection based on these commitments.

3.81 **GP Surgery:** Mr. Parks echoed the need for a larger GP surgery.

- **Response:** See the response to Councillor Sian on GP services above.

Croxley Green Parish Council (CGPC)

3.82 **Green Belt Status:** The CGPC objects to the loss of Green Belt land and refutes the 'Grey Belt' assessment.

- **Response:** The **Green Belt Addendum** present the applicant's assessment that the site is 'Grey Belt' based on the NPPF (December 2024). The **Landscape and Visual Impact Assessment (LVIA)** details the development's integration with the existing settlement edge.

3.83 **Design and Density:** The CGPC states that the proposed density and building heights are out of character with the area.

- **Response:** The **Design and Access Statement** outlines an average density that is reflective of the surrounding area and details how design principles are derived from local context to ensure high-quality design.

3.84 **Parking and Services:** The CGPC claims insufficient parking and that existing services (sewerage, water, electricity) are inadequate.

- **Response:** The **Transport Assessment** justifies the proposed parking levels based on active travel potential, and parking will be finalised at the Reserved Matters stage. Thames Water has issued a conditional no objection regarding foul water, and Affinity Water raised no objection regarding water quality or quantity.

3.85 **Traffic and Transport:** The CGPC believes traffic will be adversely affected and that a sustainable transport plan has not been demonstrated.

- **Response:** The applicant is actively providing further information requested by **HCC Highways** and **Active Travel England**.

3.86 **Application Timing and Neighbourhood Plan:** The CGPC argues the application is premature given the ongoing Green Belt Review and that it doesn't account for the Neighbourhood Plan.

- **Response:** This Planning Statement Addendum has provided an assessment of the Application against the relevant policy tests of the Neighbourhood Plan, noting it has advanced. It also acknowledges the Neighbourhood Plan and states that the development proposals have sought to use its Design Guide to inform the application's Design Code.

3.87 **Heritage, Species, and Environment:** The CGPC claims the development will adversely affect Durrants House and skylarks, and that it objects to the removal of street trees.

- **Response:** A **Heritage Statement** has been prepared, with the harm to be weighed against the public benefits of the proposal. The **Ecological and Biodiversity Impact Assessment** identified skylarks and details proposed enhancement measures. The **Noise Impact Assessment** states that noise levels could meet requirements with appropriate mitigation.

3.88 **Community Facilities and Drainage:** The CGPC questions the need for new facilities and claims that new roads will take excess surface water.

- **Response:** The **Local Centre Capacity Statement** justifies the provision of facilities to meet local needs. The **Sustainable Drainage Strategy** details how the drainage design will comply

with relevant standards, and the **Lead Local Flood Authority (LLFA)** has raised no objection subject to conditions.

3.89 **Net Zero:** The CGPC notes the lack of an overall assessment of energy demands or embedded carbon.

- **Response:** The **Energy Statement** analyses the project's energy efficiency, predicting it will exceed carbon emission reduction requirements and contribute significantly to the Council's net zero goal.

Sarratt Parish Council (SPC)

3.90 **Green Belt and Separation:** The SPC objects to overdevelopment on Green Belt land, rejects the 'Grey Belt' classification, and believes the application impacts the separation between Croxley Green and Chandlers Cross.

- **Response:** See the response to Councillor Mitchell and the CGPC regarding the 'Grey Belt' assessment. The Grey Belt Addendum addresses the concept of Grey Belt further in respect of the proposed scheme. In any event the **Planning Statement** thoroughly addresses the concept of 'very special circumstances' as an alternative justification. The **LVIA** demonstrates how the development is designed to be contained and integrated with the existing settlement.

4 THE CASE FOR DEVELOPMENT

- 4.1 It is not considered that the issues addressed within this Planning Statement Addendum alter the conclusions arrived at in the initial Planning Statement submitted in December 2024. Instead, this Addendum serves to highlight minor amendments where necessary or reasoned justification to comments raised by consultees through the consultation process.
- 4.2 As demonstrated within the initial Planning Statement, the adopted development plan is acknowledged to be out of date. Specifically, the Plan is failing to deliver the required amount of housing.
- 4.3 Where there is an absence of a five-year supply of housing, the NPPF sets out that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 4.4 The Applicant notes that the general presumption in favour of sustainable development remains following the December 2024 NPPF. Whilst it is still required to consider whether adverse impacts would significantly and demonstrably outweigh the benefits when considered against the NPPF as a whole, we are also directed towards 'key policies'. These key policies are set out in Footnote 9 of the NPPF, though captured under four headings. These are set out below, along with Richborough's response:

- **Directing Development to Sustainable Locations (NPPF Paras 84, 91, 110 and 115).**
Paragraph 110 confirms that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 seeks to ensure that sustainable transport modes are prioritised; safe and suitable access can be achieved for all users; the design of streets, parking areas, other transport elements and the content of associated standards reflects the National Design Guide and National Model Design Code; and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

The Site is well located to promote sustainable transport and provide residents with convenient access to a wide array of amenities. This reflects the Council's initial findings within the draft 2025 Settlement Appraisal prepared to assist with the formulation of the Local Plan Review. This was presented to Members at the 8th October 2025 Local Plan Sub-Committee referenced at paragraph 3.8 of the Officer report concluding: *"Initial findings are that the settlements scoring 'Very Good' in sustainability terms are Rickmansworth, Chorleywood, South Oxhey, **Croxley Green** and Leavesden and Garston."*

Safe and suitable access will be provided through two vehicular points from Little Green Lane, via Durrants Drive and Links Way, where Little Green Lane traffic will yield priority to

vehicles entering and exiting the site. Crucially, the development prioritises active travel with dedicated pedestrian and cycleway accesses. A significant proposed improvement includes a shared footway/cycleway link from Canterbury Way, continuing through Dover Way and Links Way to Baldwins Lane, ensuring a safe and direct connection to Croxley Danes School and local shops. The internal road network is also designed to accommodate two-way bus travel and features combined footway/cycleways. To further enhance sustainable travel, a dedicated bus service (Service 22) will operate from the site, providing half-hourly connections to major transport hubs like Watford Junction, Watford, Croxley Green, and Rickmansworth, also benefiting existing residents along Durrants Drive with new bus stops. The scheme will also incorporate Beryl Bikes docking stations on-site to promote cycling, and secure cycle parking will align with local and LTN 1/20 standards. Additionally, the developer is committed to making a suitable contribution towards step-free access at Croxley Underground Station, with ongoing discussions with Transport for London (TfL) to finalise details.

A comprehensive Framework Travel Plan will support the development, aiming for a minimum 15% reduction in single-occupancy car use for journeys to work compared to baseline census data. The Transport Assessment and subsequent analyses confirm that the vehicular movements generated by the development are acceptable. The total forecast vehicular trip generation is modest, with 315 trips during the morning peak and 304 during the evening peak. Crucially, the studies indicate that the development will have no unacceptable impact on highway safety, and its addition will result in negligible or no noticeable impact on the operation of key junctions on the surrounding road network. Therefore, the proposals align with national, regional, and local transport policies, and there are no reasons to resist the application on traffic or transportation grounds.

The proposal is therefore in a sustainable location and would comply with the sub-criteria of Paragraph 11d(ii) and with Paragraph 155(c).

- **Making Effective Use of Land (NPPF Para 129).** Chapter 11 seeks to make effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125(a) encourages multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental gains, such as development that would enable new habitat creation or improve access to the countryside. In assessing proposals against this policy, consideration should be given to a number of factors including the need for housing; viability; availability/capacity for infrastructure; capacity of area to change and securing well designed places (linked to item below). The scheme achieves the objective of making effective use of land, safeguarding the environment, and ensuring healthy living conditions by providing a mixed-use development of up to 600 homes on a 40.7-hectare site (an average density of 43.17 dwellings per hectare). It maximises multiple benefits by delivering a significant net environmental gain, surpassing the mandatory

requirement with 71.38% Habitat Units BNG through extensive habitat creation and retention of Ancient Woodland. Healthy living is secured through allocating 60% of the site (25.51 hectares) to publicly accessible green space, including the Rousebarn Country Park and various play areas, encouraging active lifestyles and improving access to nature. The proposal also incorporates necessary supporting infrastructure, such as a one-form entry Primary School and a Medical Centre (GP Surgery), ensuring a well-designed, functional, and integrated extension to Croxley Green.

- **Securing Well-Designed Places (NPPF Paras 135 and 139).** Particular consideration has been given to the design and function of the proposed scheme. This is articulated through the multiple revisions that have been made to satisfy consultee comments through the course of the application. The scheme demonstrates particular consideration for design and function through an iterative, high-quality landscape-led masterplan process informed by extensive technical analysis and stakeholder feedback. Despite the Outline application reserving most matters, the proposals are articulated via a Design and Access Statement (DAS) and a comprehensive Design Code, ensuring high-quality design is secured for Reserved Matters. This coded approach ensures the final development will be well-designed, functional, and consistent with the site's environmental and historic context.
- **Providing Affordable Homes (NPPF Para 66).** This policy approach requires developments to plan for the required mix of affordable housing to meet local needs, including homes for rent and other tenures. The provision of up-to 300 affordable units as part of the scheme is compliant with local policy and will deliver housing in line with the mix required by and requested of the Housing Team. This key policy has been complied with.

4.5 Consequently, for the reasons given above, RPS find that any adverse impacts of allowing the application would not significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and the new provisions of NPPF para 11(d)(ii).