

RESPONSE TO PLANNING ADDENDUM

Land To North Of Little Green Lane Croxley Green WD3 3SP Ref 24/2073/OUT

Introduction

Thank you for inviting the Parish Council to comment on the Additional Planning Statement submitted by the RPS Group on behalf of the developer, Richborough.

We have considered the Statement dated October 2025, revised documents mentioned in the statement, and consultee comments submitted since our previous comments on the application.

The Parish Council maintains its strong objection to the proposed development and has the following further comments.

GENERAL CONSIDERATIONS

The proposed development is within the area of Sarratt Parish Council but is, to all intents and purposes, an extension of the settlement of Croxley Green. The impact of a development of this scale will be felt throughout Croxley Green and beyond, into both Watford and Rickmansworth.

The development would add some 600 dwellings to the current 5,500 dwellings within the Croxley Green Parish area (more than 10%). According to some consultees, at an average of 2.4 persons per dwelling, some 1,400 people in addition to current population of about 12,000 (more than 10%).

The Parish Council accepts there is a need for additional homes in Three Rivers.

The Croxley Green Neighbourhood Plan identified the lack of suitable sites within the Parish area, and the importance of the adjoining Green Belt to the residents. This development is proposed on a site that is literally a green field site, having been used for agriculture, apparently successfully, for many generations.

DESIGN AND ACCESS STATEMENT

The amended Design and Access statement (Revision C, October 2024) refers to the Sarratt Neighbourhood Plan (SNP) and totally ignores the Croxley Green Neighbourhood Plan (CGNP). Whilst this may be correct, in planning terms, as the proposed development is outside the CGNP area, it ignores the fact that the settlement that would be extended is in fact Croxley Green, not Sarratt village, or any of the other settlements within the SNP area. This appears a disingenuous oversight.

In particular, in response to the SNP, the developer states SNP Policy 1(b) is not relevant. However, it is relevant as the proposed development is on the edge of a village and is not small scale.

SNP Policy 1(c) has not been complied with. The developer has not successfully engaged with the community, indeed over 600 objections have been lodged from the community. There is no evidence that the community is satisfied with the proposal and the provisions offered.

SNP Policy 3 Heritage context. The proposal does not protect the setting of Durrants House. The current views across open countryside will be severely limited to a narrow view between new buildings, up to 4 storeys high. This doesn't protect the setting at all.

HOUSING AND COMMUNITIES

The addendum sets out the aims of the development which is to address the need for market and affordable housing provision, NHS medical provision, community use agreements and public open space.

The addendum does not deal with our initial concerns (set out in our response in February of 2025) concerning the design, layout and density of the proposed development.

The response to our concerns goes against what we said regarding existing patterns of development in the local environment.

The addendum does not respond adequately to our concerns about general overdevelopment and a significant cumulative impact on Croxley Green. The response that the HIA includes a qualitative cumulative assessment, concluding that no significant cumulative effects on health and social care services or housing have been identified is insufficient

INFRASTRUCTURE AND UTILITIES

Statutory consultees have identified shortfalls in current provision in many areas including, but not limited to, education, health services, water supply, water treatment, and power networks.

The proposed scale of increase is simply unsustainable without concomitant investment in provision for education, health services, water supply and treatment, and power supply within Croxley Green and the neighbouring areas.

Three Rivers District Council should satisfy itself that the necessary investment is planned and will be forthcoming before any development on this scale is approved.

ENVIRONMENTAL PROTECTION

The proposed country park and associated amenity spaces do not improve views of Durrants House. If the proposed buildings were not constructed the views would remain totally unobstructed. The proposed buildings restrict the views towards Durrants House and alter its setting on the edge of undeveloped countryside. The

proposed viewing corridor severely restricts the existing setting and views of Durrants House

TRANSPORT AND ACCESSIBILITY

The proposed development is not well served by roads or public transport and is remote from the local neighbourhood centres. The addendum identifies the outstanding transport issues.

The amended Transport Assessment (T24544 REV E) October 2025 responds to comments from highway authorities and other transport consultees.

A number of errors have been corrected, however the assessment still relies on optimistic assessments of the likely volumes of traffic, and the extent to which sustainable travel modes will be used.

For example, there is no assessment of the current travel patterns from neighbouring areas within Croxley Green which would reveal the likely patterns of car ownership and use, the use of bicycles and buses, and of travel on the underground.

There is no evidence of the current levels of bus patronage, or of the take-up of Beryl bikes.

The assessment shows that the proposed development will significantly increase the volume of traffic along Links Way and Durrants Drive, increasing congestion at the junctions with Baldwins Lane.

The proposed development of the site in two phases does not show how the site is to be accessed by construction traffic, all of which will have to use minor residential roads which are currently, in effect, culs de sac, linked by the narrow Little Green Lane.

GREEN BELT

Croxley Green parish Council does not agree that this land is “grey belt”, as defined by the updated NPPF. As demonstrated by the developers own landscape strategy plan (Illustrative Drawing DL02 revision G) the edge of the Green Belt is defined by a clear physical boundary, Little Green lane and its historic hedgerows.

Whilst the proposed total site is somewhat defined by existing features, in fact one must look at the proposed built area shown in white on the applicant’s plan. The built area stops well short of the existing physical boundaries, such as the roads and woods on all sides, and is not clearly contained. It does not meet the test for “grey belt”.

One definition of sprawl is a development reaching out as a finger into the Green Belt. The landscape plan shows that the proposed built areas will reach out into the green area as fingers. They will create a series of built areas stretching out into the green area with a rough or untidy outline, meeting the definition of sprawl. The proposed development does not meet the test for “grey belt” under this heading.

SPORTS PROVISION

The off-site provision for outdoor and indoor community sports, which is now advocated by the developer, works directly against the sustainable travel policies advocated in other parts of the document.

HOUSING MIX

There is no reference to the Housing policies in the Croxley Green Neighbourhood Plan, which are relevant where the development is an extension of the current settlement, albeit within the area of an adjacent parish.

The Sarratt Neighbourhood Plan (SNP) has been approved at Referendum. Therefore, the SNP policies on Housing Mix (policy 4) and Affordability (policy 5) should be applied to this development,