

My name is Cllr Chris Mitchell, I am a local District councillor for Croxley Green and a resident for 43 years.

1. I assume sir, that you have or will visit the site. My first question, "Is the site Grey belt". The developer states it is, and the statement of common ground hints at it, but does not state that it is. However, the last time the full council considered this site was on the 27th January when this site was considered green belt. This was a full council meeting when the Local plan was formally agreed to proceed to Regulation 19 stage.
2. The Arup Level 4 green belt report, officially accepted this year, designated this parcel area CG8 which is fundamentally this application site as still being Green belt. Arup are a worldwide highly reputable company and I see no reason not to take their version. It is a matter of judgement based on the criteria set out, and I ask you the question is it not reasonable to accept that this site is green belt as Arup have stated. In my professional career, as a chartered civil engineer, I worked alongside Arup a number of times and I found them to always work to very high standards and be fully professional.
3. The Stage 4 Green Belt Review considers that Parcel CG8 makes a significant impact to purpose (a). One of the primary purposes of the 2025 Green Belt Review is mapping out provisional grey belt. The word provisional has been used to emphasise that there are still other factors to be considered prior to deciding whether land fully constitutes grey belt. Parcel CG8 is not identified as provisional grey belt. I was going to say more, but I refer to the comments made by Barry Grant for the Croxley Green Residents Association and Guy Parks, Parish councillor, which I totally agree with on this issue
4. The recent version in Annex E of the NPPF, states that purpose A to be strongly contribute would be
 - a. Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s). They are also likely to include all of the following features:
 - b. Be adjacent or near to a large built-up area; and
 - c. If developed, result in an incongruous pattern of development (such as an extended 'finger' of development into the Green Belt). I say it is a big fat figure.

5. I consider that this site does strongly contribute to Purpose A, and stop sprawl in a built up area. There is a clear existing boundary of the built up area and the green belt Little Green lane, then there is Rousbarn lane to the east, but going NW, this is unconstrained which this development would constitute urban sprawl.
6. The CPRE submission stated submitted their view that this site is Green belt.
7. CPRE added “the magnitude of the proposal is a factor in our view and likely to become more so in the light of recent experience since the introduction of grey belt which has already led to significant potential reductions in the Green Belt in Three Rivers and the neighbouring Borough of Hertsmere and the City and District of St Albans”. This site is Green belt.
8. My second question. If you consider that this really is still green belt then the exceptional circumstances do not stack up. Especially as we now have a Reg 19 stage developing Local plan that shows that there is more than 5 years worth of housing supply, even without this site. The site needs to meet paragraph 155 in the old NPPF or paragraph 7 G in the new one. I consider it does not.
9. Third Question. Then even if it is decided to classify this as grey belt, then very special circumstances: are again not necessarily met for the reasons above. then regard must be had to Paragraph 153 of the old NPPF, or GB6 (2) of the new, which states the following:
 - Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

10. Waste Comments

Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that a Grampian condition is added to any possible permission. We already have places in Croxley Green where the sewage can overspill into people gardens, and on one road nearby. They say “STW capacity constraints with Maple Lodge STW

being upgraded to ensure a higher quality of treated effluent. We'll also increase the capacity of the storm tanks. This will reduce the need for untreated sewage discharges during storm conditions. We plan to complete this work in 2030".

11. Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. We are in a water stressed area and an updated study should be carried out as the last strategic study on this issue was 2017.

12. towards decision.

- A New 1FE Primary School: Do we really need this? Local schools say not with classroom closures.
- The application includes provision for NHS health and social care services. The Hertfordshire and West Essex Integrated Care Board recognise that there is a clear need to address primary healthcare provision in Croxley Green. However, this is the Wrong location as residents will have to walk a long way, meaning most journeys will be by car or taxi.
- I suggest this site is not sustainable, being at least 1.6km for the station and access through very long residential streets which will cause huge hardship to local residents during construction and in the long term.
- Can you consider turning this appeal down based on the representations from myself and the many others at this Inquiry?

13. Fourth Question. Is it not reasonable to consider that this site will be examined again when the Public Inquiry takes place of the local Plan in about a years' time in the light of all the other potential developments in the plan. As this site is not sustainable and in such a bad location for such a development, it may be decided to take it out at that stage. The Minister of State for housing and planning stated in his letter dated the 16th April to the leader of the council, "Examination remains the appropriate forum for testing individual

site allocations and the supporting evidence based in a transparent and impartial manner.” I suggest that this is not an appropriate outline application, should be turned down and the site would be considered fully at examination stage of the Local Plan.

14. Final Question. If you do decide to agree to the appeal, which I hope you do not, then please can you add a condition that no further detailed planning application to be lodged until a Masterplan has been fully agreed with the LPA.

Thank you for listening and I am happy to send a copy of this to you.

CDM 3/09/2026