

**On Behalf of the Chiltern Society**

*The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB). Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.*

Three Rivers Planners are to be congratulated on the scope and detail of their documents. We cannot hope to do justice to such a document. We are aiming at presenting comments on the aspects we consider to be most important. We are not commenting on Moor Park, Eastbury, South Oxhey, Oxhey Hall or Carpenders Park because they are beyond the core of the Chilterns area.

**General Comments**

**Green Belt**

The first response from the Chiltern Society must be to express great concern at the proposed incursions into the Green Belt land of the Chilterns area. The Society's agreed policy is to oppose development in the existing Green Belt which fails to protect its openness or undermines its five purposes, as set out in Paragraph 134 of the National Planning Policy Framework (NPPF).

In actual fact all of Three Rivers which is not already designated as a settlement/ urban area or a brown field site is within the Green Belt and we wish to stress that all other options should be explored before building on it.

The obvious ways to avoid building on Green Belt land are to increase the density of building within the urban areas, to build on brown field sites and consider opportunities to find sites in adjoining districts. The possibility of negotiating with another area such as Watford which has at least in the past exceeded its required level of housing development comes to mind.

Paragraph 137 of NPPF sets out the approach that the Council is required to take in order to demonstrate whether there are exceptional circumstances for changing Green Belt boundaries. Our view is that housing need alone does not demonstrate exceptional circumstances. The Council must also consider whether the area of Green Belt being considered is still meeting the five purposes.

**Incursions into Green Belt**

It is vital that AONBs and sites of special scientific interest and local wildlife sites should be preserved. We wish to draw attention for example to site PSC 4. East Green Street in Chorleywood which is designated as an AONB.

Developments in the AONB are controlled through Paragraph 172 of the NPPF and we would not expect any major developments to be proposed in the Chilterns AONB. Site PSC.4 is undoubtedly a major development (>500 dwellings) and there are alternative non-AONB sites, so it fundamentally fails to meet the tests in the NPPF and is therefore contrary to national policy. Therefore, the Society objects to the inclusion of this site. We would also be concerned about any other AONB sites that might emerge during the consultation process. Development should be resisted that would have a detrimental impact on the setting of the AONB eg by impacting on views into and out of the AONB

We would also be opposed to development which would impact on SSSIs / Local Wildlife Sites. We are concerned that the Sustainability Assessment scoring fails to distinguish between such sites and "ordinary" greenfield sites, assessing all of them as only minorly adverse in biodiversity terms. This needs to be remedied if the SA scoring is going to play a major part in the site selection process.

Areas of woodland provide counters to air pollution and should similarly be preserved. Ancient woodland is now specifically protected by the NPPF.

### **Brown Field Sites**

The plans for Rickmansworth, Croxley Green and Chorleywood do indeed suggest making use of urban land alongside the railway lines which are not ideal but would be similar to other developments close to the railway. We refer to **CFS 20** Rickmansworth Station, **CFS 41** Croxley Green Station Car Park and **CFS 16** land at Chorleywood Station. However development at Rickmansworth Station would be extremely difficult as the station is in continuous use. Some of CFS 16 by Chorleywood station is part of Chorleywood Common and cannot be built on. Building on the remainder could have this housing dominating Chorleywood village centre in an unacceptable way.

Redevelopment on Brown Field sites in general gives a good possibility for increasing the building density. Blocks of flats constitute one type of development. Three storey town houses - the Townfield development in Rickmansworth is a good example of three and four bedroom houses with small foot prints but good accommodation which includes storage space often missing in small properties. Also the Bury Meadows four storey maisonettes in Rickmansworth town centre come to mind. Both these developments include small areas of open space.

While we extol the internal designs of these properties, we admit that the external design of these two sets of buildings could be modernised and improved. The Chiltern Society is keen to promote good design and note that design issues have been boosted by the revision of the NPPF in 2018. The Chilterns AONB Design Guide provides useful local guidance in this respect. The outward appearance of several of the recent developments in Rickmansworth Town centre is pleasing to the eye though there is minimal inclusion of green space in these developments and we have not seen the insides.

## **Flood Zones**

We wish to express particular concern about building in flood zones. As the name Three Rivers suggests our district has a considerable area of low lying land which also includes the Grand Union Canal and the lakes of the Rickmansworth Valley. Up till now there has been very little flooding of buildings in the area because of the presence of areas of flood plain to take up the water if the rivers overflow. In addition a system of sluices directs water from one area to another if necessary. We feel it is vital to preserve the flood plain from development. Over the past 50 years the land adjacent to Moor Lane for instance has been under water from time to time for weeks or months on end although for a period in the late 90s and the early part of the 21<sup>st</sup> century it dried out. Part of **area CFS40** adjacent to Park Road, the surface of which is close to the level of the water table, has had a lake of surface water from time to time. Land adjacent to some of the buildings on the Affinity Water Depot site has also been flooded at times. We would strongly counsel against building on these areas.

## **Land adjacent to the M25**

Sites located alongside the M25 are very visible and great care is needed with landscaping schemes to ensure that, if the sites are chosen, their design is appropriate to their location within the Chilterns. Woodland areas could be considered to help to mitigate concerns in relation to air quality and noise, as well as providing valuable habitat and green space.

**Areas CFS37** in Rickmansworth, **area OSPF3** in Heronsgate, Chorleywood areas **CFS26A and 26B** in Abbots Langley North are all immediately adjacent to the M25. Building on this land in close proximity to the M25 should be avoided for the immediate future because of air pollution from high levels of traffic. When legislation outlawing diesel fuels comes into effect and when more petrol engines are replaced by electric engines then building close to the motorway could be considered if sound barriers are put in place. Land in these areas which are further away from the motorway could be considered where there is woodland between the motorway and the land for development.

A visit to site **OSPF 3 at Heronsgate** (adjacent to the M25) revealed that the noise level even on a Saturday afternoon is very high . The site slopes up from the motorway and the only trees are almost all below the level of the M25 therefore they have no mitigating effect on the noise. In addition this site can only be accessed by 2 narrow country lanes which are single track with passing places. Shepherds Lane wood and wildlife area should be preserved not built on.

In contrast **Site CFS37** on the opposite side of the M25 In Mill End is much less affected by the noise. The motorway that side is in a cutting, there are also trees including evergreen holly on the embankment and the land falls away quite sharply towards the current housing developments in Mill End. There is now a new secondary school just opened here (Sept.18).

A site visit to **CFS 26A** in Abbots Langley showed that the M25 runs through a cutting and there is quite a substantial wooded area along part of the site, thus noise is only a minor problem. However this is an attractive piece of rural landscape which provides a barrier between the areas of Abbots Langley and Kings Langley.

**Site CFS 26b** is protected to some extent by the M25 running through a cutting. It is pleasant undulating land, and also provides a barrier between Abbots Langley and Kings Langley. (Please note that access to the Hertfordshire Way leading to Sheppey's Lane has been blocked for whatever reason.)

### **New Developments and Infrastructure**

There are several largely new developments proposed for North and South Abbots Langley, Bedmond and on the outskirts of Croxley Green and Maple Cross. The large developments in these areas are at present all accessed by narrow or very narrow country lanes. To put in new roads will be very expensive and entail loss of hedgerows and trees. Yet without better access the new residents will face nightmare traffic jams just to leave their homes. Similarly shopping areas, doctors surgeries and provision for public transport will be needed and in most cases primary schools.

Any infrastructure development particularly of access roads must be undertaken at the beginning of any development which may not be the way developers wish to work. Other infrastructure should not be left till last. It will be important to retain all areas of woodland and local wildlife sites to provide pleasant environments in these areas and reduce the problem of air pollution and to provide recreational opportunities for future residents.

The success of the Rickmansworth Aquadrome over the last few years shown by the tremendous increase in usage of its facilities is a pointer as to how to provide good leisure facilities in newly developing places. The well advertised 'health' walks and wildlife tours and the provision of the café and the large car park have helped. It has been good to note that a café has been proposed for Leavesden Country Park which is another Three Rivers green asset.

Many of the sites reviewed can only be accessed by narrow country lanes which in places are single track with passing places. These are unsuitable for public transport. Proper access roads will be needed before homes are built and finding space for widening these lanes will be difficult. Removing hedges and trees will destroy all that make the sites attractive. Yet without better access the new residents will face nightmare traffic jams just to leave their homes.

### **Health Centres**

Medical facilities in most areas are already under great pressure. It is vital that more

provision is made for these. All the larger developments need GPs surgeries included in their plans.

### **Affordable Housing**

In the Chiltern Society submission of comments on the “Preferred Options in September 2017 on Question 5 Affordable Housing we expressed concern at the lack of affordability of many homes built recently in the Three Rivers area. We underlined option 3 which suggested that all developments of 10 or more dwellings should provide 60% affordable housing and all new developments between of between one and nine dwellings should provide either 60% affordable housing or if appropriate a commuted payment towards off-site provision. We would like to reiterate this so that the importance of building affordable housing is never lost sight of during the projected developments of the next twenty years. We have noted that developers are apt to try to modify planning agreements to avoid their initial promises. This seems to be a countrywide problem. Recent publicity about the chief executive of Persimmons would suggest that developers should look to balance their books in ways other than cutting back on affordable housing. One of the advantages of affordable housing is that the land take is reduced and houses tend to be built at a higher density. If this type of provision can be accommodated within or on the edge of settlements then the environmental impact on the Green Belt and AONB would be likely to be reduced.

The Sustainability document Item 13, p66 expresses the need for affordable housing admirably:Item 13. “Ensure that everyone has access to good quality housing that meets their needs.” Asking the question “Would development of a site secure \*affordable homes? \*lifetime homes.”

It specifies the need to provide a range of housing types, size and tenure, including high quality affordable and key worker housing that meets the needs of all communities within the districts: to reduce the percentage of unfit/non-decent homes, to help reduce homelessness. Also to meet the needs of the gypsy and traveller communities. We endorse these aims.

### **Comments on Specific Sites**

#### **Rickmansworth**

Most sites have been dealt with under Flood Zones and Brown Field sites. Three of the remaining sites are along London Road. **CFS 59** where the suggestion is to build a residential home would be infilling a gap between other buildings. It could be regarded as acceptable infilling – as per the revised planning guidance of July 2018.

Further up the London Road **PCS 15 and CFS 66** are in an area where the Green Belt between Northwood, London and Rickmansworth, Herts has almost disappeared. It needs to be retained. The current use of PCS 15 as a golf course or any other outdoor recreational

activity is acceptable as it is there already but a change of use to residential is unsatisfactory. To preserve the shrinking Green belt the preservation of CFS66 from development is essential. In fact the Green Belt has virtually disappeared on the opposite side of London Road.

### **Croxley Green**

**CFS 21** Land between Rousebarn Lane and little Green Lane. In this area the land contains several wooded areas and open fields. Any development should retain all woods and hedgerows to maintain its rural appearance and to absorb the effects of air pollution. This site abuts Whippendell Woods in Watford District enhancing the rural appearance of the whole area. The suggested uses as open space, country park and sports facilities are imaginative. The development will require a great deal of work to make the site accessible – at present it can only be accessed along very narrow lanes. It would be good to preserve as much as possible of the woodland. Any development of the open spaces and provision of access roads could improve the drainage of the area which is inclined to be muddy.

**PSC 49** Little Green playing fields is a welcome green space in an area where there has been a great deal of new building in the past. However there is a small recreation ground on the opposite side of Baldwins Lane.

**PCS 51** Cockaygne. It is very difficult to approach this site as there are high hedges and housing strung out along narrow lanes. It is isolated from the rest of Croxley Green and has the disadvantage that the roads bordering it are narrow country lanes. The area would need provision of infrastructure, in addition to access roads it would need shops, public transport and doctors surgeries. It is a site that provides an important barrier of green space between Croxley Green and Loudwater.

### **Kings Langley**

**CFS23** Langleybury is largely a green field site and besides being in the green belt it is very isolated with none of the facilities needed for a residential area.

**CFS24** has already been suggested for a motorway service area. It is very close to junction 20 of the M25 and is unsuitable for residential development on account of air and noise pollution.

**CFS55.** We don't have personal experience of the area between the River Gade and the Grand Union Canal but it would surely be foolish to build there on account of the likelihood of flooding. The land adjacent to Station road is not suitable for residential development on account of its proximity to the Motorway and Junction 20.

### **Abbots Langley North**

**CFS76** rear of 45 Harthall Lane projects into the very narrow strip of Green Belt between

Hemel Hempstead and Kings Langley/Abbots Langley which is extremely undesirable. Harthall Lane itself is very narrow and unsuitable for further development.

Ribbon development is already swallowing up Green Belt along Toms Lane. There is almost continuous development already along Toms Lane practically up to Bedmond. Toms Lane itself at the Kings Langley end is very narrow and unsuitable for greatly increased traffic.

**CFS26A and CFS26b** have already been dealt with under sites adjacent to the M25 and we believe they should not be built on.

**CFS6** Mansion House Equestrian Centre itself is well contained within trees and hedges. No development should be contemplated beyond these bounds into what is an important part of the Green Belt shielding Abbots Langley from the M25.

### **Abbots Langley South**

**PCS44** and the adjacent **ACFS7** are in the Green Belt and provide a buffer between High Elms Lane and a densely populated part of Woodside, Watford, along Horseshoe Lane. **ACFS7** is a wooded area and a local wildlife site within PCS44 which is an added reason to avoid building on it.

There are two sites further up High Elms Lane which is pleasantly rural in spite of being the site of three schools. **Site CFS3** is on the South west side of the lane is adjacent to some residential development. **Site CFS5** on the opposite side of High Elms Lane is adjacent to Parminters School and is very much outside the rest of the development area and has a footpath across it used by walkers.

While it might seem that the two secondary schools and Francis Combe School in Woodside, Watford could serve new developments it should be remembered that a large development is already taking place at Fairways Farm on the other side of the A405 North Orbital Road and a further large development **CFS65** is proposed for the Golf course adjacent to Fairways Farm.

**Site CFS65**. This golf course besides being in Green Belt is not well located for a large development as it is adjacent to the A405 which takes a large volume of traffic passing at speed. If children are to access the secondary schools in High Elms Lane a major change to the access to the A405 will be needed. It may be needed anyway as access for the Fairway Farm development.

**PSC60** land at Furtherfield is a possible site for building if its past use as a landfill does not pose problems. The aspect facing South over Leavesden is rather bleak so screening of that side of the area with trees would be good.

### **Money Hill and Mill End**

**PCS 59** (Berry Lane ) is in the centre of a residential area. It is an

area of green space that is very little used for any recreational purposes, the William Penn Leisure Centre and the open ground along Shepherds Lane provide what is needed. We understand that it has only remained undeveloped up till now because it was a land fill site over 50 years ago. It is a good plan to build affordable housing close to all amenities as this site is.

### **Maple Cross**

**CFS33** Much of Maple Lodge is a rather scruffy site with a large vacant office building on it. To use this site for business/industry and a hotel seems natural. It could also be a site for a supermarket to serve the whole of Maple Cross (see comments on CFS 34 and 34a below).Lidl might find it a more viable alternative to the old police station site.

**CFS32** Lynsters. The centre of this site is somewhat raised but the parts close to the lakes are vulnerable to flooding. Maple Lodge Nature Reserve on the edge of the site which includes some of the lake area would need protection from disturbance.

**CFS34 and 34a** Land south of Hornhill Road and Woodland road.

This is Green Belt. However Maple Cross has languished for years as an under resourced satellite of Rickmansworth and Mill End. The residents have had to fight even to keep their bus service going. The suggestion that this site should be developed and contain shops and a community green space is worth serious consideration.

There is a need for a mix of good quality shops and a community building of some kind to provide a meeting place for both adults and children. As the site is on the edge of Maple Cross it will need careful planning to make the site accessible to the whole of Maple Cross.

**CFS36** This site is Green Belt and unless it is selected over site CFS24 as the location for a motorway service area there is no reason to build on it.

**CSF64** Land south of Chalfont Lane West Hyde. This would be ribbon development of Green Belt land which is so out on limb that its development is very undesirable particularly also because there are no facilities for residents in West Hyde apart from a public house, St Thomas Church and the Community Hall.

### **Sarratt and Chipperfield**

In accordance with the Revised National Planning Policy Framework July 2018 the developments put forward for Sarratt and Chipperfield are mostly small which will help to preserve these rural villages as villages.

However the sites **ACFS12, CFS47A and CFS47B** are on a ridge overlooking the Chess Valley AONB. We cannot stress too highly that no development which would be visible from the Chess Valley should be allowed. One house was recently allowed which is likely to be visible from the Chess Valley at least for part of the year.

### **Summing up**

Our thanks are due to Three Rivers planners for this opportunity to join them in looking ahead. It should be possible to improve the environment for residents of Three Rivers by careful selection of sites and good design which includes not only buildings but their surroundings, Finally we are anxious see a leap to push forward with affordable homes which is our greatest need whilst protecting the integrity of the Chilterns AONB and the Green Belt.