#### Part 2: Sites for Potential Allocation

Below is a collection comments made by Green Party members to help other members and the wider community form a consultation response to the Three Rivers Local Plan. This is not a complete list of sites and if a site is not listed here, it does not mean that it poses no issues or concerns. We urge you to view the full list published here:

https://www.threerivers.gov.uk/egcl-page/new-local-plan It has also been recommended to comment on sites not taken forward (Appendix 2) in case these are resurrected at a later date.

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# Abbots Langley & Leavesden

### EOS4.0: Land adjacent to Bedmond Road & South of M25, Abbots Langley

The site sits within the Green Belt and the boundary extends north to the M25 motorway. The motorway already presents a substantial barrier to the effective use of the Green Belt by people and wildlife. By extending the site boundary up to the motorway, this further fragments the ecological network and creates isolated pockets of habitat such as Round Wood and Long Wood. This proposal goes against Preferred Policy Option 21 which recognises the importance of linked habitats.

The site sits significantly outside of the existing urban envelope of Abbots Langley and therefore compromises the integrity of the Green Belt. Open space inside the M25 is of importance to the residents of Abbots Langley in their enjoyment, health and wellbeing especially because access to open space to the north of the M25 has limited access via sustainable transport methods.

Any dwellings situated close to the motorway would be at risk of exceeded air quality objectives. An example of this is the Air Quality Management Area (AQMA) in Chorelywood which has historically exceeded levels of NO2 and PM10. It should be noted there is currently no safe level of exposure to

air pollution. This proposal would put future residents at risks of exposure to dangerous air pollution and goes against Preferred Policy Option 17.4.

Development would greatly spoil the rural appearance of the area and would take a large step towards making Kings Langley, Abbots Langley and Watford an uninterrupted conurbation.

#### H3: Pin Wei Restaurant, High Street

This is an excellent restaurant, and although Abbots Langley has several, it would be a sad to lose this one. This site should be safeguarded for small businesses.

#### **H6: Hill Farm Industrial Estate**

While this is already built up, this provides space for small businesses. It is very close to the Warner Bros site, adjacent to one of the buildings and so could accommodate businesses that support Warner Bros or acquire trade related to the site. At present it has businesses operating including one that works with the film industry (Hill Farm Studio and Workshops.) This site should be safeguarded for small businesses.

# <u>CFS28: Gypsy Lane, Hunton Bridge. Warner Bros & OSPF6 Land west of Leavesden aerodrome, Hunton Bridge. Warner Bros</u>

The information on the proposed Warner Bros developments raises more questions than it answers in terms of the actual intentions of Warner Bros and the likely extent of building and destruction of existing Green Belt. The mention of green infrastructure, ecological reserve and public green space is not convincing without detail and legal commitment. In general, Warner Bros is a welcome employer providing skilled work opportunities but its valued status must not be a trump card allowing Warner Bros to make additional demands. The Gypsy Lane right of way would be threatened.

### Bedmond

#### CFS56: Church Hill Road, Bedmond

The site sits within the Green Belt and is a lowland meadow priority habitat and would therefore be considered of principal importance for biodiversity. 97% of UK wildflower meadows have been lost since the 1930s. In the view of the Herts and Middlesex Wildlife Trust, this site should be treated as a Local Wildlife Site in terms of the NPPF and Local Plan policies.

There are extensive public views into the site and therefore development of this prominent site would clearly be contrary to the overall aim of the Green Belt, which is to maintain its openness. Housing expansion in this location would be detrimental to the purpose of protecting the Green Belt gap between Abbots Langley and Hemel Hempstead.

Development of the site would result in the removal of a number of trees which form an attractive part of the village setting.

# Kings Langley

#### ACFS8b: Flower house, 2-3 Station Road, Kings Langley

The flower shop opposite the station will be another local business being closed down for accommodation for commuters. This is currently a successful business that would expand if given the chance. The location may be convenient for commuters to live in but it is also well placed to provide services to commuters and other local people. This site should be safeguarded for small businesses.

# **Croxley Green**

#### CFS19: Land adjacent 62-84 & 99-121 Sycamore Road

The current use of the site is amenity grassland uses and enjoyed by residents which makes this site completely unacceptable for development. A proposal was already rejected by TRDC for a smaller development.

### CG65: British Red Cross, Community Way

Redeveloping this site will remove a vital, well-used community space, which was built using funds raised directly from Croxley Green residents. Replacing the existing building with a smaller community space and 6 flats will have a negative impact on the viability of the community space and would require a building higher than the neighbouring properties which would not be acceptable.

### CFS70b: Croxley Business Park, Hatters Lane, Croxley Green

Although an 8 metre buffer distance between the main river is stated, this is not enough because it creates a pinch point with the residential area to the north and fragments the ecological network, disconnecting the woodland to the east from SSSI site Croxley Common Moor. This proposal goes against Preferred Policy Option 21 which recognises the importance of linked habitats.

### Rickmansworth

#### OSPF22: Batchworth Golf Course

A major development of this size would likely add to the flooding and contamination issues affecting the bottom of Harefield Road. A complete upgrade of the sewage system is required.

The current public footpath from Sheffield Avenue, which would be the primary footpath to the town centre, is insufficient due to the steep gradient and narrow width. Cycling is currently dangerous on both London Road and Harefield Road. Walking and cycling routes to the site are unsuitable.

The development is likely to have a negative impact on Greenbroom Spring which is currently a quiet woodland with biodiversity value. It is a woodland managed by TRDC and recognised as part of the Priority Habitat Inventory by Natural England. The site is identified in the Hertfordshire Ecological

Network mapping project habitats listed within S41 of the NERC Act and should be avoided by development and protected by the development management system.

The Local Plan should identify a "buffer" next to the woodland on the south, west and north of the site should be provided with a commitment to extend and link Greenbroom Spring and The Grove woods. Ideally, this should not be managed as a Local Wildlife Site or similar which aims to protect and enhance biodiversity.

The plot coverage of dwellings and hard landscaping as indicated in the indicative masterplan may not be sufficient in delivering a net gain in biodiversity.

With the absence of a commitment to ensure the "publicly accessible open space" within the southern side of the site will be of high quality, incorporating recreational facilities as well being managed for biodiversity, the development would add additional pressure to oversubscribed existing green spaces such as the Aquadrome.

Lack of services, such as a grocery store and GP surgeries encourages dependency on motor vehicles.

#### CFS77: Rickmansworth Library

This site is arguably the most valuable site in the whole district. The proposals are unambitious and the relocation of the library is ill conceived and opposed by large numbers of residents. The relocation of the library from its current high street location would be a great loss to the community.

The site forms a key civic and community hub on the high street and with its position facing towards Watersmeet and Basing House there is potential for vast improvements to the public realm and the creation of a new town square. There is support for development in principle, but a masterplan for the town centre should be commissioned to look at a spatial strategy for achieving a mixed-use development with new dwellings alongside a new library, community and office space.

A development of seven dwellings is not going to generate the income required for the investment that this unique town centre location deserves. TRDC must look again at the proposals for this site and the surrounding area and bring forward a proposal that delivers wider benefits to residents and local businesses.

#### H18: Royal British Legion, Ebury Road

The development would result in a deficit of community provision within the town. This proposal fails the tests a)-d) of Preferred Policy Option 10 - proposals for the redevelopment or change of use of any premises resulting in the loss of social or community facilities, or services that support the local community and therefore should not be permitted.

# CFS60: Affinity Water Depot, Church Street

The site presents a vast technical challenge in terms of flood mitigation, with the site being in Floodzone 3a and 3b.

As no new residential dwellings can be created in Floodzone 3b, there are concerns over whether the existing office and depot buildings on the "island" to the north of the site are suitable for conversion to residential. If Permitted Development is used for conversion, this may result in a poor standard of homes.

Instead of this proposal, TRDC should consider developing the "island" as a water-powered renewable energy generator.

#### CFS41: Rickmansworth Station, Station Approach

70 dwellings would not likely be commercially viable to build on such a sensitive site, therefore it is suspected the number of dwellings on this site may ultimately be increased to achieve viability.

Redevelopment of the train station would likely present severe operational disruption during construction. There are concerns about the relationship between TRDC and TFL and accountability for work on such a sensitive site.

Development of the whole site, including the loss of the car park and drop off area would likely have a negative impact on the accessibility of the station including the provision of disabled parking spaces.

The development is likely to have a negative impact on local businesses including the taxi company, café, and restaurant currently based within the site boundary.

The redevelopment of the train station has huge potential and could result in improvements to station facilities and the surrounding public realm. As the "gateway" to the town, further consideration is required to assess the potential for a mixed-use development, incorporating commercial and/or community use to achieve the correct balance of residential to non-residential.

A masterplan for the station area should be commissioned to look at a spatial strategy for achieving a mixed-use development that delivers wider benefits to residents and local businesses. TRDC must look again at the proposals for this site and the surrounding area.

#### H22: Depot, Stockers Farm Road

A complete upgrade of the sewage system is required to ensure flooding and contamination issues affecting the bottom of Harefield Road are not exacerbated and are improved as a result of any major development.

It is not clear why the site boundary includes part of the Local Wildlife Site to the west of the existing depot. If there is no reasonable justification, the field and hedgerow should be protected and development restricted to the brownfield area only.

### Mill Fnd

EOS7.0: Land to the south of Shepherds Lane and west of the M25

Any dwellings situated close to the motorway would be at risk of exceeded air quality objectives. An example of this is the Air Quality Management Area (AQMA) in Chorelywood which has historically exceeded levels of NO2 and PM10. It should be noted there is currently no safe level of exposure to air pollution. This proposal would put future residents at risks of exposure to dangerous air pollution and goes against Preferred Policy Option 17.4.

# Chorleywood

#### CFS57: Pheasants Ridge Gap, Berry Lane and PSCFS19: Land south west of Berry Lane, Chorleywood

The two sites are in an unsustainable location without sufficient walking and cycling routes or public transport connections to the nearest centres of Chorleywood and Rickmansworth, meaning there would be an over reliance on motor vehicles. The upper part of Berry Lane is a single-track road with passing places and therefore both proposals, totalling 55 new dwellings, would have an unacceptable impact on traffic congestion along the lane.

# Maple Cross & West Hyde

#### EOS12.2 - Land to the west and south of Maple Cross

The site sits within the Green Belt and the boundary extends west to the M25 motorway. The motorway already presents a substantial barrier to the effective use of the Green Belt by people and wildlife. By extending the site boundary up to the motorway, this further fragments the ecological network and reduces opportunities for wildlife migrating between north and south. This proposal goes against Preferred Policy Option 21 which recognises the importance of linked habitats.

HS2 is already having a significant impact on the local environment south of the site, with the south portal tunnel compound being in use for at least the next 15 years and having a detrimental impact on the integrity of the Green Belt in Three Rivers and adjoining districts. The environmental mitigation measures by HS2 must benefit the residents of Maple Cross and should feed into a spatial strategy of any expansion of the settlement.

The site is not in a sustainable location being too far from the nearest centre of Rickmansworth by foot, with Uxbridge Road being too dangerous for cycling and poor public transport links. This will lead to an over reliance on motor vehicles.

Any dwellings situated close to the motorway would be at risk of exceeded air quality objectives. An example of this is the Air Quality Management Area (AQMA) in Chorelywood which has historically exceeded levels of NO2 and PM10. It should be noted there is currently no safe level of exposure to air pollution. This proposal would put future residents at risks of exposure to dangerous air pollution and goes against Preferred Policy Option 17.4.

It is suggested that the size of the proposal is significantly reduced in size with any dwellings to the west of the existing settlement being removed.

#### CFS32a - Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross

This piece of land and the proposed industrial units overshadow a large part of New Lake. It borders the Maple Lodge Local Nature Reserve which requires tranquillity and connectivity to flourish.

This site is part of TRDC's Green Infrastructure Corridor and is located in Herts CC Key Biodiversity Area that states the site has a very high ecological sensitivity due to the surviving wet grassland between two important wetlands. UK BAP habitats and species are present on adjacent sites and the site is not only used by red and amber listed birds but as a breeding ground.

The site is within water Source Protection Zone 1 which is the most sensitive in terms of the potential risk of contamination to the groundwater source. The site is at very high risk of groundwater flooding due to the high groundwater levels that increase the risk of contamination, especially when combined with industrial uses.

The site stands directly above the springs in the upper part of the Colne Valley, through Springwell, running down under the fields providing a continuous flow of good, sweet water to feed the adjacent lake, which in turn feeds the chain of lakes through Denham, Uxbridge, and beyond, into London. The importance of this green and watery wildlife corridor cannot be overstated, and it is a vital contributor to the health of the Colne Valley Regional Park environment.

Any interference with the flow - foundation excavation for instance, or water runoff from vehicles and car parking areas - would have a serious impact on a unique and diverse chain of lakes enjoyed by thousands. The negative effects from a development of this site would be felt all down the valley through Denham, Uxbridge, and beyond which would compound the significant destructive impact of HS2 on Broadwater Lake and the wider Colne Valley.

The site has a high amenity value with 350 anglers (plus family members & families) using and camping for extended periods throughout the year.

Destitute women and their children who are street homeless – some of the most vulnerable within our society are housed here.

There is a Grade II listed building within the site boundary. The Heritage Impact Assessment states that the site's development would have a moderate adverse impact on the historic environment, as the Listed Building currently sits within its historic setting of an agricultural landscape and would be destroyed by industrial uses.

# Carpenders Park

#### CFS69a - Land at Carpenders Park Farm - Northern Parcel

The site is within the Green Belt and is a beautiful pasture of a former dairy farm which closed about 8 years ago when farm itself was turned into a private nursing home. The three fields have fully developed into wildflower meadows and have large hedgerows separating them. There is a variety of species of bird, mammals, insects and flowers and has significant biodiversity value. The three fields are bordered by the Woodland Trust's Merry Hill Nature Reserve to the east.

There is a public footpath that leads through one of the fields, which leads from Carpenders Park to Bushey with views over the surrounding countryside. It is a popular walking area and as there are no boundaries and the fields are used frequently by residents. The site is an important for local

residents' enjoyment, health and wellbeing This proposal would restrict opportunities for people to access the countryside.

The proposal does not respect the line of the existing urban area and infringes on the Green Belt. This proposal constitutes significant urban sprawl which compromises the integrity of the Green Belt.

# Additional comments

Hampton Hall Farm was taken out of the potential sites list, quite rightly due to flood risk. In Rickmansworth, an area characterised by its waterways, a marina for residential boat moorings at Hampton Hall Farm should be considered.