

**Representations to Draft
Hertsmere Local Plan**

**Regulation 18 Consultation
(September 2021)**

On behalf of
Hertfordshire County Council as
landowner

December 2021

Prepared by
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HERTFORDSHIRE COUNTY COUNCIL
REPRESENTATIONS TO DRAFT HERTSMERE LOCAL PLAN
REGULATION 18 CONSULTATION
DECEMBER 2021

Contents

1.0	INTRODUCTION	3
2.0	LAND SOUTH OF ST ALBANS ROAD, SOUTH MIMMS (SITE REF.: HEL385C)	4
3.0	EDGWAREBURY FARM, ELSTREE (SITE: HEL274)	8
4.0	HCC 6 – FORMER SUNNY BANK PRIMARY SCHOOL, POTTERS BAR (SITE HEL318)	10
5.0	SITE BE5: ELSTREE WAY CORRIDOR	12
6.0	COMMENTS ON GENERAL POLICIES	13

Appendices

Appendix 1 - Windfall Site Plans

Appendix 2 - Former Sunnybank School site boundaries

Appendix 3 - Details of Carpenters Park School site allocation

1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Vincent and Goring on behalf of Hertfordshire County Council (HCC) as a landowner in respect of the Regulation 18 Draft Hertsmere Local Plan. The report was commissioned by the County Council's Property Team.

BACKGROUND

- 1.2 The County Council's Property Team are promoting the following housing allocation sites within the Local Plan:
- Popes Farm, South Mimms (Site HEL385c)
 - Edgwarebury Farm, Elstree (Site HEL274)
 - HCC 6 – former Sunnybank Primary School, Potters Bar (HEL 318)
- 1.3 HCC (Property Team) made representations as part of the Call for Sites / Issue and Options consultation in November 2017 whereby these sites were initially put forward. Since this time, HCC has continued to work with Hertsmere Borough Council (HBC) to understand the appropriate level and mix of uses to be provided on the sites at South Mimms and Elstree. A planning application was submitted to HBC in July 2018 for residential development on part the Sunnybank site (Ipa ref 18/1475/OUT). This application was refused by HBC in April 2019 and dismissed at appeal by PINS in October 2019 on the basis that it constituted inappropriate development in the Green Belt and significant weight could not be given to the relatively early stages of the Emerging Local Plan, which proposed removal of the site from the Green Belt.
- 1.4 In respect of the South Mimms and Elstree housing allocation sites, HCC has developed masterplan layouts informed by a significant amount of background technical assessment work. The masterplans and the technical assessment work have been presented to HBC to assist in the understanding and suitability of these sites for allocation for residential development. Further detail is set out within this statement.
- 1.5 In addition to the strategic sites, which have been identified as draft allocations within the emerging plan, HCC has a number of other land holdings, which it wishes to promote for various uses. These are considered to be suitable for designation as part of the windfall sites policy. Further details are set out within this statement and location plans are attached at **Appendix 1**. These sites comprise:
- Potters Bar Fire Station, Mutton Lane, Potters Bar
 - Elm Court Community Centre, Mutton Lane, Potters Bar
 - The Park, ESC, High Street, Potters Bar
 - Bushey Fire Station and Fire Station House, Rudolph Road, Bushey
 - Maxwell Park Youth and Community Centre, Maxwell Road, Borehamwood
 - Oakmere Community Centre, Featherstone Close, Potters Bar

2.0 LAND SOUTH OF ST ALBANS ROAD, SOUTH MIMMS (SITE REF.: HEL385C)

DESCRIPTION OF THE ALLOCATION

New homes

- 2.1 HCC welcomes the identification and allocation of Land South of St Albans Road as part of **Policy H10** Schedule of housing sites: Strategic Sites for the provision of housing. This site is identified within the plan showing Strategic Site SM1: South Mimms Village Growth Strategy and also within the table on page 113, which breaks down the total provision of proposed housing within South Mimms into four sites, one being HEL385c/SM1.
- 2.2 It is noted that HEL385c is allocated to provide 80 homes, as part of an overall provision for South Mimms of 225 new homes through four allocated sites. It is important that the plan emphasises that the numbers attributed to individual sites are taken as an estimate and not an upper limit of development. This is to allow flexibility in delivery in order that Hertsmere can meet its identified housing need within the plan period in case other sites do not come forward as quickly as anticipated.

Community facilities

- 2.3 HCC supports the provision of a new Village Green which is shown within the masterplan for HEL385c. This originally followed the line of the Conservation Area boundary; however this is proposed to be amended as part of the Draft Conservation Area Appraisal. The scale and boundaries of the Village Green will be further developed as part of further iterations of the masterplan, and the planning application proposals.
- 2.4 HCC notes the reference to the expansion St Giles Primary School to a 2FE. The school is currently a 0.5FE school. The Local Objectives for South Mimms (set out at page 41), states that an additional 0.5FE will be provided at St Giles Primary School. It is believed that the reference to a 2FE school is incorrect and should be amended. It is also not clear at any point within the plan whether the expansion of the school will be delivered within the current school site, as various references within the DHLP refer to 'Land to north of B556 and west of Blanche Lane'. It has also been missed off the plan on page 104. It would be helpful if the location of the expanded school and the size of the expansion could be clarified in order that HCC as a landowner can comment further.
- 2.5 HCC supports the aspiration to provide a new village shop, however this must be a viable commercial proposition.

Infrastructure

- 2.6 HCC are disappointed that there is no reference to the proposed Fire and Rescue Hub as indicated within the masterplan for HEL385c. A Fire and Rescue Hub has been identified as a required service provision by HCC to replace aging and inconveniently located existing facilities. The site at South Mimms has been identified as a suitable and available location for a new facility. The location is ideal in terms of access to both the M25 and A1(M), which in turn provides fast access to a number of surrounding settlements. The changing focus of fire and rescue call outs, from domestic and commercial fires to a greater demand from road traffic accidents, means that convenient access to the strategic road network is crucial. No other suitably located sites have been identified. This location would provide the best available position to meet this need. It is therefore requested that this provision is included as part of the site allocation details.

Sustainable transport

- 2.7 HCC supports the objective of providing sustainable transport options as part of SM1, as well as off-site highways works to improve access to public transport services. Contributions should however reflect the scale of the development and meeting the CIL/Planning Obligations tests in terms being proportionate and reasonably and fairly related to the development.

Environmental improvements

- 2.8 It is unclear how the requirements of criterion (m) relate to the strategic allocation at South Mimms.

High quality design

- 2.9 Whilst HCC supports the provision of a masterplan (which has already been prepared for HEL385c) and the requirement for design codes as part of any planning application, the right balance between prescription and guidance should be struck when preparing a design code document.
- 2.10 Masterplans and design codes would need to be produced for individual sites rather than for the strategic allocation as a whole. HCC does however commit to working with the promoters of the other sites that make up SM1 to ensure a coordinated approach to delivering the objectives set out on pages 104 – 105 of the DHLP.

PROPOSALS MAP

- 2.11 The development area for HEL385c differs between the draft Inset Proposals Map, and the plan on p104 of the DHLP. It is assumed that the Proposals Map is the more accurate portrayal, but there should be consistency across all plans.

SOUTH MIMMS LOCAL OBJECTIVES

- 2.12 It is considered helpful at this point to consider how site HEL385c compares against the local objectives set out at page 41 of the DHLP:

Local Objective	Compliance by HEL385c
1. Provide appropriate, attractive and affordable mix of new housing to meet local need	The masterplan prepared for this site provides a mix of housing types and includes 40% affordable housing. HCC will engage with HBC to ensure the appropriate mix and tenure as part of any forthcoming planning application
2. Preserve and enhance the rural character and setting including its historic core and heritage assets	The masterplan has been carefully developed to protect and enhance the heritage assets on Blanche Lane, with the village green providing an appropriate setting and the arrangement of blocks within the scheme providing long vistas towards the Grade I St Giles Church

3. Reinforce the character of South Mimms through a redefined village centre and settlement boundary, a new Village Green and protection of key views along St Albans Road	The provision of the Village Green helps to re-establish a centre for the village, providing a new focus for the heritage assets and key existing public buildings. The masterplan has been arranged so as to set development back from St Albans Road, maintaining important views along this road to St Giles Church.
4. Reduce the impact of the M25 A1(M) and services through appropriate landscaping and screening	The site was remodelling approximately 10 years ago to provide more of a natural acoustic barrier between the M25 and the village. Development of HEL385c with further enhance this through the introduction of a landscaped tree belt wrapping round the edge of the site and providing further acoustic and visual screening between the M25 and the site, as well as the wider village.
5. Facilitate the provision of an additional 0.5FE extension to St Giles Primary School	Further clarification is required, but it is assumed that this will be accommodated within the existing school site, which HCC as a landowner would support. HEL385 has an existing footpath that links into Frowyckes Close, providing direct pedestrian access to St Giles school.
6. Support existing community, cultural and local facilities, including a village store off St Albans Road	The introduction of new housing to South Mimms will in itself help to support the existing services by increasing the number of residents in the village.
7. Promote walkable neighbourhoods, improved pedestrian access across St Albans Road and to the countryside	The scheme seeks to introduce new and improve existing pedestrian links through and within the site to encourage walking. The existing footpath running through the site provides direct access to Blanche Lane at St Giles School, which meets the objective of providing a walkable neighbourhood.
8. Promote sustainable modes of transport, and measures to discourage commuter and commercial vehicle parking	The scheme proposes new bus stops along St Albans Road, as well as improved pedestrian and cycle links
9. Enhance connectivity with larger settlements	This will be delivered through a package of sustainable transport measures
10. Secure appropriate designed and located open spaces and green corridors, inc. enhancement of the Catherine Bourne	There are several elements of open space proposed as part of HEL385c including the village green, the landscaped 'belt' around the edge of the masterplan, as enhancements of existing footpaths around the site.

<p>11. Enhance the attractiveness and walkability of local roads through traffic calming and improved parking for existing residents</p>	<p>HCC will work with the Highways Authority to identify appropriate measures to be secured as part of a forthcoming planning application</p>
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3.0 EDGWAREBURY FARM, ELSTREE (SITE: HEL274)

DESCRIPTION OF THE ALLOCATION

- 3.1 HCC welcomes the allocation of this site for housing, to provide approximately 100 homes. As with HEL385c, it is important that the plan emphasises that the numbers attributed to individual sites are taken as an estimate and not an upper limit of development. This is to allow flexibility in delivery in order that Hertsmere can meet its identified housing need within the plan period in case other sites do not come forward as quickly as anticipated.
- 3.2 Less information is provided in relation to this site, with the key site specific requirements contained within the table of page 109 of the DHLP.

ELSTREE LOCAL OBJECTIVES

- 3.3 Site HEL274 has been considered against the Local Objectives for Elstree Village, set out at page 28 of the DHLP:

Local Objective	Compliance by HEL274
1. Defining a new Green Belt boundary to incorporate areas of growth	In preparing a masterplan for this site, consideration has been given to HBC's Green Belt Review, HBC's Landscape Assessment work, HCC's own commissioned landscape appraisal and the existing physical features of the site to identify a new defensible boundary for the Green Belt around Elstree Village
2. Protect the character of the village as a separate and distinct village	The development of HEL274 will not result in the merging of Elstree with any neighbouring settlements. HBC's Green Belt Assessment considered this site to be contained, and the existing intervisibility with the village results in lesser encroachment.
3. Deliver new homes to meet local needs through an appropriate mix of affordable and specialist housing	This will be achieved on the site
4. Identify an appropriate site for a replacement health facility	Not applicable to this site
5. Support the local shopping facilities	The development of HEL274 will support the continued viability of the local shops at Elstree Village by introducing more households into the vicinity and generating more footfall.

6. Reduce traffic congestion and increase sustainable modes of transport	The scheme seeks to introduce new and improve existing pedestrian links through and within the site to encourage walking and cycling. The scheme also proposes upgrades to existing bus stops along Elstree Hill South to encourage use of public transport
7. Support the sensitive reuse of vacant listed buildings	There are no listed buildings within the site.
8. Protect existing Employment Areas to the south of the village	Not relevant
9. Secure the provision of enhanced access for the local community to the countryside	The scheme will seek to upgrade existing routes and introduce new routes through and within the site to the wider countryside beyond
10. Minimise any impact of existing AQMA 5 at Elstree crossroads	The scheme will seek to minimise use of the private car through encouraging and investing in sustainable transport modes, and the preparation of a Travel Plan as part of any forthcoming planning application.

4.0 HCC 6 – FORMER SUNNY BANK PRIMARY SCHOOL, POTTERS BAR (SITE HEL318)

SITE DESCRIPTION

- 4.1 HCC welcomes the allocation of this site for housing, however HCC has identified that slightly more of the site will be required for the delivery of an SEND school using the existing school buildings within an extension and part of the old school playing field. A plan is provided at **Appendix 2** to demonstrate the proposed split of the site..
- 4.2 The same comment applies to all the housing allocations in the plan, that it is important to emphasises that the numbers attributed to individual sites are taken as an estimate and not an upper limit of development. This is to allow flexibility in delivery in order that Hertsmere can meet its identified housing need within the plan period in case other sites do not come forward as quickly as anticipated.
- 4.3 Less information is provided in relation to this site, with the key site specific requirements contained within the table of page 110 of the DHLP.

PROPOSALS MAP

- 4.4 It is requested that the area of the proposed housing allocation is amended to reflect the plan attached at **Appendix 2** in order that an SEND school can be delivered on part of the site.

POTTERS BAR LOCAL OBJECTIVES

- 4.5 Site HEL318 has been considered against the Local Objectives for Potters Bar, set out at page 33 of the DHLP:

Local Objective	Compliance by HEL318
1. Increase the delivery of new homes, meeting local needs through an appropriate and affordable mix of housing	Development of part of this site will deliver new homes to meet local needs. The remainder of the site will be retained to deliver an identified service need, in line with draft Policy LF1 .
2. Deliver sustainable new neighbourhoods south of Potters Bar and on the former Potters Bar Golf course	Not relevant
3. Enhance the environment of Darkes Lane town centre	Not relevant
4. Support the High Street	Not relevant
5. Provide more play areas and facilities for young people	The site will be divided to provide an enhanced SEND school with open space associated with this. The remainder of the site has the opportunity to provide open space associated with the residential development.

6. Reduce congestion including that caused by traffic by the diversion of vehicles from the M25	It is not considered that the development of the site to provide an enhanced SEND school and residential will result in increased congestion on the local road network. Any planning applications will be supported by a Transport Assessment to demonstrate this.
7. Address the severance created by the junctions formed by Mutton Lane with Darkes Lane and the High Street	Not relevant
8. Protect existing Employment Areas and support the continued development of appropriately located new employment opportunities	Not relevant

5.0 SITE BE5: ELSTREE WAY CORRIDOR

- 5.1 The County Council owns land in the Elstree Way Corridor within the EWC Location 2 Elstree Way North and EWC location 3 Elstree Way South.
- 5.2 As a landowner, HCC supports the provisions contained within policy BE5 for EWC locations 2 and 3.

6.0 COMMENTS ON GENERAL POLICIES

THE SPATIAL STRATEGY

Settlement hierarchy

- 6.1 Overall, HCC supports the spatial strategy of the DHLP. HCC welcomes the identified hierarchy of settlements within the Borough, and in particular, the acknowledgement that both South Mimms and Elstree are identified as Key Villages, both of which are sustainably located, and can support expansion to deliver new homes.
- 6.2 It is understood that the level of expansion within both Elstree and South Mimms is dictated in part by infrastructure capacity, in particular primary school places. Demand for school places at a particular school in any particular year is obviously a difficult area to predict with complete accuracy, therefore there should be some flexibility built into the number of units attributed to each of these Key Villages, and indeed, individual sites to reflect this, and also to be agile enough to respond to changing patterns of housing delivery across the Borough through the plan period.

Infrastructure

- 6.3 Table 8 of the DHLP sets out proposed infrastructure and community facilities and includes reference to expansion of the primary school at South Mimms within SM1 Land to north of B556 and west of Blanche Lane. It is not clear from this reference what this means, or where it is located, as the existing St Giles School is located to the east of Blanche Lane, and this provision is not shown on the Map demonstrating the general expansion of South Mimms on page 104 of the DHLP. It would be helpful if this could be clarified in order that HCC can comment further.
- 6.4 A new Special Educational Needs and Disability (SEND) school is to be provided on part of the site of the former Sunnybank primary school. Plan 5269/205 Rev.A (attached at **Appendix 2**) details the division of the site between the proposed residential development and the new school. The area to be occupied by the SEND school includes that previously occupied by The Links Education Support Centre (ESC) which has been relocated. It is requested that this site should be included within Table 8 of the DHLP and the Proposals Map should be amended to reflect this.
- 6.5 The County Council has also acquired a site at Carpender's Park to provide a new secondary school. The site lies partly in Three Rivers District and partly in Hertsmere. The Three Rivers District Council (TRDC) Part 2 Local Plan Regulation 18 Sites for Potential Allocation Consultation June 2021 includes the area within TRDC as an education allocation. It is requested that the part of the site lying within Hertsmere is included within the DHLP as an allocation for education. Details of the proposed school are attached at **Appendix 3** shows the site, which proposes the school playing field on land within the Hertsmere Borough boundary. It is requested that this site should be included within Table 8 of the DHLP.

- 6.6 HCC notes the requirement that new residential development should provide high quality and easily accessible open space within close proximity to residents. This is true of both the draft residential allocation sites being promoted by HCC. For Edgwarebury (site HEL274), this is provided through the provision of a new Country Park, providing a green buffer to the proposed development, utilising and enhancing existing permissive pathways through the site, and opening up more of the land for informal recreation and public access. In the case of South Mimms, site HEL385c not only provides informal open space that wraps around the southern and western edges of the site, with planting proposed to add a further acoustic barrier to the M25, but also the masterplan includes the provision of a new village green, which will provide a new 'centre' and focus for the village, building on the existing features of St Mary's church, the war memorial and the pub.

Sustainable transport

- 6.7 HCC supports the objective that new development should be located in or adjoining existing settlements where access to sustainable transport routes and facilities exist or can be made available, designing developments to prioritise sustainable transport modes over the private car. These objectives have been incorporated into the masterplans for both the strategic residential sites being promoted by HCC. Both sites introduce or seek to upgrade new pedestrian routes within and through the site, building on identified desire lines. Consideration has also been given to introducing new, conveniently located bus stops, which are easily located for new residents along existing transport corridors, to encourage use of sustainable transport modes. HCC has engaged with the Highways Authority in the preparation of masterplans for both strategic residential sites to ensure that the proposals meet the objectives of LTP4.

Climate change

- 6.8 HCC are committed to delivering the objectives of reducing carbon emissions and other elements that will have a positive impact on the climate on all their development sites, including biodiversity enhancement, incorporating SuDS, and encouraging sustainable transport.

Natural and historic environment

- 6.9 All the residential allocation sites being promoted by HCC take account of and seek to protect and enhance the natural and historic environment. In particular, Site HEL385c at South Mimms creates a feature of the Grade I listed St Giles Church, with the placement of development blocks within the masterplan located so as to provide long vistas towards the church and allow long views of the church from along the St Albans Road by setting back the development.
- 6.10 Both residential allocation sites at South Mimms and Elstree provide opportunities to enhance the natural environment through the introduction of green routes, which in the case of Site HEL274, builds on existing routes and field boundaries. Both sites are also able to demonstrate and delivery biodiversity enhancements through the large areas of open space that they will provide.

INDIVIDUAL PLACE STRATEGIES

Elstree Village

- 6.11 HCC note that Elstree Village is identified as a Tier 4 settlement, being the second largest village in Hertsmere, and that local objectives for this settlement include the delivery of new homes to meet local needs, including adults with additional needs. The local objectives acknowledge that this development will require redefining the green belt boundary to accommodate this growth, which is supported by HCC.
- 6.12 HCC welcome the acknowledgement that the physical constraints of the crossroads that forms the centre of the village, involving the A5133 (Elstree Hill) and the A411 (Barnet Lane) limits any further scope to adjust the junction design. This reflects the local objective of reducing traffic congestion by increasing the availability of sustainable transport modes, in line with LTP4.
- 6.13 HCC supports the identification of site HEL274 -Land at Edgwarebury, Elstree Hill South, for 100 homes, including 6 adult disabled units in the table on page 29. It is noted that the number proposed is limited by existing primary school capacity within the village. As stated previously, these figures should be treated as a guide rather than a limit or exact figure. This is to allow for flexibility of housing delivery to meet identified need, and also to reflect changing patterns of demand for school places which cannot be predicted in a precise way.
- 6.14 It is also noted on page 29 that there is reference to the provision of new public open space at Edgwarebury House Farm. For clarity, should this instead refer to 'Land at Edgwarebury' (Site HEL274)?

South Mimms

- 6.15 HCC welcomes the classification of South Mimms as a key village within Hertsmere, which can support provision of additional housing to meet the needs of the local community.
- 6.16 HCC welcomes the support for the introduction of the new village green through the masterplan of Site HEL385c. It is considered that this element of the plan provides a significant asset to the village, delivering on some of the key objectives set out within this section: reinforcing and enhancing the character of the village; redefining its 'centre' by incorporating some of the villages key historic assets and ensuring that existing views of the church are maintained and enhanced.
- 6.17 The masterplan for Site HEL385c also achieved the objectives of promoting a walkable neighbourhood and promoting sustainable transport through the introduction and enhancement of pedestrian routes through and beyond the site, and providing additional bus stops on St Albans Road.
- 6.18 HEL385c also delivers on the environment objectives of seeking to further reduce the impact of the M25 on the village by providing a green, planted buffer along the interface with the M25, and also linking this round to follow the orientation of the Catherine Bourne, enhancing this existing PRow and green corridor.

SUSTAINABLE GROWTH AND REGENERATION

- 6.19 HCC supports the Council's approach in respect of reducing carbon emissions to minimise impacts on the climate. Notwithstanding this, it is considered that climate change policies should be output focused, allowing for innovation in technologies.

- 6.20 HCC supports the general objectives of **Policy SG1** within the context that some Green Belt land is required to be released to deliver on the Council's housing needs. It should also be acknowledged at criterion x. that there is a balance to be struck between increased public access to areas and preventing over exposure on ecologically sensitive areas to increased human activity.
- 6.21 HCC supports the general objectives of **Policy SG2** in respect of building resilience against climate change into new developments. It is however not clear whether the criteria listed within this policy are aspirations or mandatory requirements, that would result in the refusal of planning permissions, if not achieved. The last sentence of the last paragraph on page 47, indicates that the requirements of the various policies within the Local Plan will be balanced in determining the merits of individual planning applications. This would suggest the requirements of **Policy SG2** are not mandatory. This should be more clearly set out within the plan.
- 6.22 **Policy SG4** seeks to ensure that sufficient infrastructure and services are delivered in a timely manner to support sustainable development as outlined in the Local Plan. The Local Plan and the IDP identify 'strategic sites' as over 200 dwellings, and identify South Mimms SM1 as a strategic site, through the cumulative delivery of three / four housing sites. As part of this, an expansion to St Giles Primary School is noted in the SM1 section under **Policy H10**, however there is no specific reference of this within the IDP. In addition, the IDP refers (at para.3.3.23) to the relocation and amalgamation of existing fire and rescue facilities within the Borough, however there is no reference to this within the Local Plan – specifically, the proposed new Fire & Rescue Hub proposed as part of HCC South Mimms site (HEL385c).
- 6.23 HCC Property would welcome the opportunity to maintain dialogue with HBC and service providers to ensure that efficient use of the site allocations – HEL274 and HEL385c - can be achieved without being unnecessarily constrained by infrastructure limitations. HCC would encourage HBC to take a proactive and holistic approach when considering the appropriate capacity of sites, and not be overly restrictive or cautious.
- 6.24 **Policy SG5** seeks to ensure a comprehensive approach to the delivery of infrastructure. In this regard, it is disappointing that HEL385c does not reference the proposal for a new Fire and Rescue Hub, as this was included as part of the masterplan. South Mimms has been recognised for some time now as an appropriate location for a new Fire & Rescue Hub, as detailed in 2.7 above. Criterion (iv) seeks to secure the provision of infrastructure projects though securing necessary funds and building flexibility into masterplans. This should be the case at site HEL385c to provide a Fire and Rescue Hub.
- 6.25 **Policy SG6** involving developer contributions should make it clear that any contributions sought will accord with the provisions of S106 and CIL Regulations in that contributions should be fairly and reasonably related to the development and not result in a development being unviable.

MEETING LOCAL HOUSING NEEDS

- 6.26 HCC supports the overall housing strategy set out within the DHLP at **Policy H1**, including the references to the housing locations set out at **Policy H10**. HCC welcomes the acknowledgement that it has been necessary to release some land from the Green Belt following rigorous assessment, in order to meet the Borough's identified housing need, which constitutes exceptional circumstances.

- 6.27 HCC welcomes the reference to the use of Vacant Building Credit (VBC) on page 62 of the DHLP and within **Policy H2**. This in turn refers to the Council's published VBC Guidance, published in 2017. The approach of the Council when assessing whether VBC is applicable in the determination of applications, should be carried out in accordance with the latest guidance from Government set out within the Planning Practice Guidance at para's: 026 - 028 (Reference ID: 23b-026-20190315 - 23b-028-20190315).
- 6.28 It is noted that **Policy H2** seeks to secure a financial contribution in lieu of provision of affordable housing on sites delivering between 5 and 9 dwellings. This is contrary to guidance set out at para.64 of the NPPF 2021 and should be removed from the policy.
- 6.29 HCC welcomes the general principles of **Policy H6** in regard to housing mix. Given that this Local Plan is intended to cover a period of 16 years, it is questioned whether it is appropriate to set out a preference for 2 and 3 bedroom properties in the larger schemes, as this may well change over the plan period as different developments come forward and demand changes, which cannot be foreseen at the present time. It is considered more appropriate to refer to the most up to date LHNA to guide the appropriate mix of housing throughout the plan period. Whilst HCC also welcomes the reference to specialist housing with care and support, this should be sought in consultation with the service provider, in order to ensure it is delivered at appropriate locations to satisfy identified need, and where it is deemed capable of being managed in a cost effective and efficient manner.
- 6.30 Table 18 distinguishes between strategic and non-strategic sites that have been allocated within the plan. It determines that sites that will deliver more than 199 units are considered strategic. This is important as **Policy SG6** makes a distinction between the two when setting out whether a baseline CIL rate will be introduced to supplement additional developer contributions secured through Section 106. In the case of site HEL385c, this has been identified as delivering circa 90 dwellings, therefore under the 'strategic site' threshold, yet, at various points in the plan, the sites at South Mimms have been described as strategic (including within the IDP). This needs to be made clear in the DHLP. They should be identified as individual sites, as they are being promoted by different owners, may come forward at different times and be affected by different costs. It is considered that the Individual Place Strategy and Local Objectives set out at Section 5 of the plan, will adequately coordinate contributions in order that collectively, these sites deliver on the required objectives for South Mimms.
- 6.31 The last paragraph on page 78 refers to the need to accommodate at least 10% of the housing requirement on sites of 1ha or less. At present the plan has only identified 19 sites, which equates to 4.5% of the total housing target. HCC can assist in this regard as it would like to identify a number of small sites within the Borough that can fall within this category and assist in raising this percentage. These sites are as follows:
- Potters Bar Fire Station, Mutton Lane, Potters Bar – relocation of current facility to a new Fire and Rescue Hub as part of HEL385c at South Mimms
 - Elm Court Community Centre, Mutton Lane – redevelopment of the site to provide replacement community facilities and residential
 - The Park- ESC, High Street, Potters Bar – the site is no longer suitable for its previous use as an Education Support Centre. The facility has been re-provided within more suitable accommodation within Welwyn Hatfield. The site is therefore proposed for redevelopment to provide residential with flexibility to provide an element of commercial / retail.

- Former Bushey Fire Station and Fire Station House, Rudolph Road, Bushey – This site has previously been offered to house the Bushey Museum, however this has not progressed. The site is therefore available and suitable for residential accommodation.
 - Maxwell Park Youth and Community Centre, Maxwell Road, Borehamwood – the previous community facilities that occupied the site have been replaced at 96 Shenley Road. This site has not been identified for any other community use and is thus available for redevelopment to provide housing.
 - Oakmere Community Centre, Featherstone Close, Potters Bar – this is not required for any other community use. The site is therefore available for redevelopment to provide housing.
- 6.32 All these sites will provide a reliable source of housing supply, having all been identified as surplus to requirements by HCC, and all located within sustainable urban locations where there is no other policy restriction that would prevent the sites being redeveloped for housing.
- 6.33 Plans identifying all these sites are provided at **Appendix 1** of this document.
- 6.34 The main points of note covered within **Policy H10** have been addressed as part of the focus on specific sites relevant to HCC. However, two points arise. The first is the need to ensure that it is clearly set out within the plan that any housing numbers attributed to housing allocations are a guide, and do not constitute an upper limit. Secondly, if it can be demonstrated (though accordance with all relevant planning policies) that additional housing can be accommodated on sites, the Council should not unreasonably restrict development, as this would be contrary to para.11c of the NPPF.

PROTECTING THE GREEN BELT

- 6.35 HCC welcomes the removal of sites HEL274, HEL318 and HEL385c from the Green Belt, as these settlements do not perform the objectives of including land within the Green Belt, and if they are to remain sustainable locations to live, further development is necessary to support the existing centres. HCC also supports the identification of HEL274, HEL318 and HEL385c for development of housing and thus removal of these sites from the Green Belt. The extent of these allocations and ownerships will enable sufficient compensatory improvements being delivered to take account of the removal of land from the Green Belt.
- 6.36 The second last paragraph on page 139 of the DHLP refers to the transfer of compensatory improvement land into a trust, partnership or local authority ownership. If the land is already within the ownership of a public body, such as the County Council, it is not deemed necessary for such a transfer to mandatory. This should be approached flexibly through the course of determining any planning application to agree the most suitable onward management and ownership option.
- 6.37 Page 139 of the DHLP refers to the need for compensatory green belt improvements in line with para.142 of the NPPF. The last two sentences of the last paragraph on this page note that the compensatory improvements cannot be delivered within the development allocation itself as they will not ordinarily be counted as such. This approach is considered inflexible as it may be that providing them on the edge of the allocation, immediately adjacent to the retained Green Belt delivers the most effective improvements, providing a transition area. It is considered that the second last sentence of this paragraph should be deleted as it does not reflect the hierarchy of provision set out within **Policy GB2**. It is considered that the hierarchy of provision set out within **Policy GB2** provides more flexibility to provide appropriate compensation in the right location.

RESPONDING TO CLIMATE CHANGE

- 6.38 HCC supports the general approach by HBC in terms of seeking to respond to climate change and reducing carbon emissions. In particular, HCC supports objective (vi) within **Policy CC1** which seeks to optimise the density of development in locations best served by sustainable transport and other local services and facilities.

DESIGN FOR LIFE

- 6.39 HCC welcomes the emphasis given within the plan to making effective use of land in line with national policy, however it is considered that the density zones are quite prescriptive and do not allow for consideration of local context and site-specific characteristics.
- 6.40 It is recognised that the figures within the policy are given as minimum levels, which accords with the NPPF, however, para.125 states that *'where there is an existing or anticipated shortfall of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities'*. It goes on to state that the minimum density standards should *'seek a significant uplift in the average density of residential development within these areas'*. It is considered that this wording should be incorporated within **Policy DL1**, rather than the minimum standard being used as a target. This policy should also note that different types of specialist housing may be delivered at higher densities due to the nature and layout of such proposals, and **Policy DL1** needs to acknowledge this.
- 6.41 HCC supports the objectives of **Policy DL2** in seeking to deliver high quality, safe and accessible development. It is noted that criterion (vi) of this policy seeks to avoid 'left-over' spaces which have no clear function. HBC should be mindful of this when fixing the boundaries of proposed site allocations listed as part of **Policy H10**.
- 6.42 HCC notes the aspiration to include street trees in all new streets, which is seen as a positive urban design objective. It is however not always possible to include trees, particularly in smaller sites, but that is not to say that appropriate landscaping to assist in 'greening' a development cannot not delivered. Para.131 of the NPPF acknowledges this and it is therefore suggested that greater flexibility by built into **Policy DL2** in this regard.

LOCAL HERITAGE

- 6.43 Paragraph 2 of **Policy HE1** addresses proposals that result in less than substantial impacts. It requires a comprehensive assessment of economic viability. This does not accord with para.202 of the NPPF which states that any harm should be weighed against the public benefits of the scheme to secure its optimum viable use. Reference to the need to weigh up the public benefits should therefore be referenced. The distinction between substantial and less than substantial harm also needs to be incorporated into the policy to reflect NPPF guidance.
- 6.44 HCC supports the general approach of **Policy HE3** in seeking to preserve or enhance Conservation Areas within the Borough. It is noted that Hertsmere recently produced a Conservation Area Appraisal (CAA) for South Mimms, which proposed to revise the boundaries of the Conservation Area (CA), most notably the boundary on the west side of the CA, which currently extends into the field to the west of Blanche Lane, but is proposed to be amended to follow the line of Blanche Lane. The map on p104 still retains the old CA boundary. HBC should therefore seek to amend this if the CAA is to be formerly adopted.

LOCAL FACILITIES

- 6.45 This section provides a list of 'community facilities' (which are not intended to be exhaustive) but includes '*emergency services accommodation*'. A distinction should however be drawn between community facilities that the public has regular access into and use of (Class D1), and a building that is occupied by an organisation that provides a service to the local community, such as a Fire Station (*sui generis*). This distinction was drawn out of an appeal decision for the redevelopment of Radlett Fire Station (APP/N1920/A/12/2186478). This distinction is assisted by the Policy Statement prepared by Government in relation to Assets of Community Value, which defines these as '*its actual current use furthers the social wellbeing and interests of the local community*'. 'Social interests' being defined to include cultural, recreational and sporting interests. This is not relevant to a service such as a Fire Station. Emergency services accommodation should therefore be withdrawn from the list of uses defined as 'community facilities' within the DHLP on page 183.
- 6.46 It is also noted within the last paragraph on page 183 that key community facilities '*rarely become permanently surplus to local requirements*'. HCC considers that this statement is somewhat of a sweeping generalisation that does not take account of the individual circumstances of a site or use, including more efficient use of land, in line with **Policy SG1** of the DHLP. It is therefore considered that this statement should be deleted.
- 6.47 Within the final paragraph on page 183, an onus is placed on applicants and service providers to demonstrate that a particular site is '*no longer required or could not be reasonably used for an alternative community facility within their remit*'. Again, the distinction should be drawn here between community uses (Class E, F1 and F2) and a service that provides for the community, but the public do not enter the building, i.e., a fire station (*sui generis*).
- 6.48 HCC does however welcome the acknowledgment that co-locating facilities can provide more flexible patterns of use and/or working practices, subject to evidence detailing the impact of that change on the need of a given type of facility.
- 6.49 Taking account of the above statements, **Policy LF1** needs to be supported by a revised list of what is defined as a 'key community facility'. Criterion (ii) also needs to acknowledge that any replacement should provide facilities that are comparable in terms of a quantitative or qualitative standard to the original, reflecting that efficient use of space is a paramount objective of both national and local policy, and acknowledged in the supporting text to this policy.
- 6.50 It is noted that Table 24 includes reference to the expansion of St Giles primary school in South Mimms within the strategic site SM1. It is not clear from the draft Proposals Map or the plan on page 104 of the DHLP where this is intended to be located.
- 6.51 It is considered that Table 24 should also include reference to the new SEND school to be provided on part of the site of the former Sunnybank primary school and the area of the proposed secondary school site at Carpenter's Park located within Hertsmere.
- 6.52 Also, in relation to Table 24, HCC request that the provision of a new Fire and Rescue Hub is added to be provided within South Mimms, as outlined in the submitted masterplan for HEL385c.

- 6.53 HCC supports the general principles of **Policy LF3** in terms of protecting and provision of new open space as part of new developments. The provision of open space should however be required in accordance with nationally recognised standards, such as the Fields in Trust Guidance, and this should be referred to either within the policy or the supporting text. In relation to this point, criterion (iv) of **Policy LF3** seeks to deliver improved access to existing space or facilities that are not currently or have limited access by the public. This requirement should be commensurate to the amount of development being proposed, again, relating to nationally recognised standards, and should not be at the expense of an existing viable use, such as an agricultural tenancy. A viability assessment should only be prepared if the amount of space provided does not meet nationally recognised standards, or that a suitable contribution to deliver off site improvements cannot be agreed in line with an adopted calculation. It is therefore considered that **Policy LF3** needs to be reworded to reflect these points.
- 6.54 HCC is generally supportive of the objectives of **Policy LF4** to secure open space and recreation facilities as part of new residential development. There is a repeat of an earlier statement that any new community or country park created as part of strategic housing allocations should be managed by a Trust or similar body. Previous comments are reiterated here, that if the applicant is a public organisation, such as HCC, it is considered acceptable for such provisions to remain within the ownership and management of HCC, if this is considered to be the most appropriate way forward.
- 6.55 It appears that standards within Table 26 of **Policy LF4** reflect those of the Fields in Trust Guidance, which is endorsed. The average occupancy level should be sourced in order that this can be confirmed, and also updated over the plan period if required. The provision of the open space requirements will be easier to meet on site on larger sites. It is noted that the policy does acknowledge that there will be exceptions where this is not possible, and an off-site contribution will be accepted.
- 6.56 In relation to **Policy LF6** it is noted that the Oakmere School and Community Centre is washed over by the Local Green Space designation on the Potters Bar Policy Inset Map. It is requested that this designation be revised to exclude the buildings themselves as well as the immediate curtilage to reflect a consistent approach to this designation elsewhere within the borough, i.e., the Elm Court Community Centre in Potters Bar and Maxwell Community Centre in Borehamwood. The criteria within **Policy LF6** are otherwise supported as they provide flexibility to allow for this space to be developed for ancillary uses associated with any buildings or activities that reflect the overarching use of this space.

SUSTAINABLE TRAVEL

- 6.57 HCC support Hertsmere's approach to encouraging sustainable transport modes as a priority over delivering new roads and parking facilities.

APPENDIX ONE



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Corporate Services
County Hall
Pegs Lane
Hertford SG13 8DE

PROJECT

**Bushey Fire Station &
Fire Station House
Rudolph Road
Bushey**

DRAWING TITLE

DRAWN	-	REVISION
CHECKED	-	
DATE	-	
SCALE	1:1250	
PLAN NO.		

HP2366

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Hertfordshire County Council 100019606, 2004

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Rev	By	Description	Date
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Lambert Smith Hampton**

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AL1 3TF

Switchboard 01727 834234
Facsimile 01727 896262
www.lsh.co.uk



PROJECT
**POTTERS BAR
ELM COURT COMMUNITY
CENTRE**

DRAWN	Sean Gallagher		
ASSET NUMBER			
DATE DRAWN	05:08:04		
SCALE	N.T.S.		
JOB REFERENCE	ELEMENT	SEQUENCE NO.	REVISION
EM 10966			

O.S. Grid Reference TL 24 01

SITE AREA 0.491 ha

**Elm Court
Community
Centre**

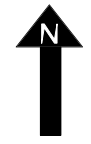
**Elm Court
Cottage**

1 to 28

ourt



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Hertfordshire County Council 10001808 2010





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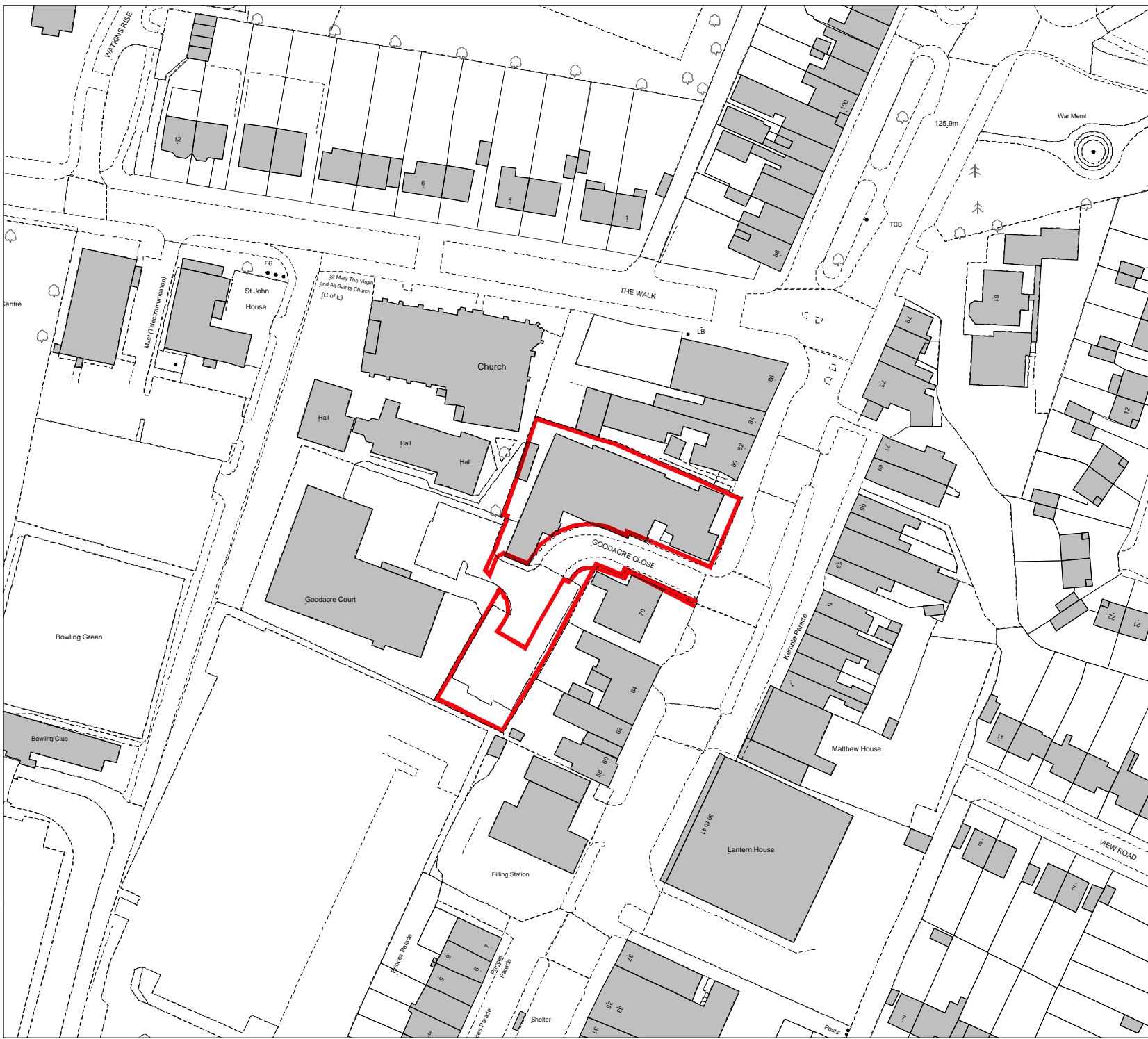


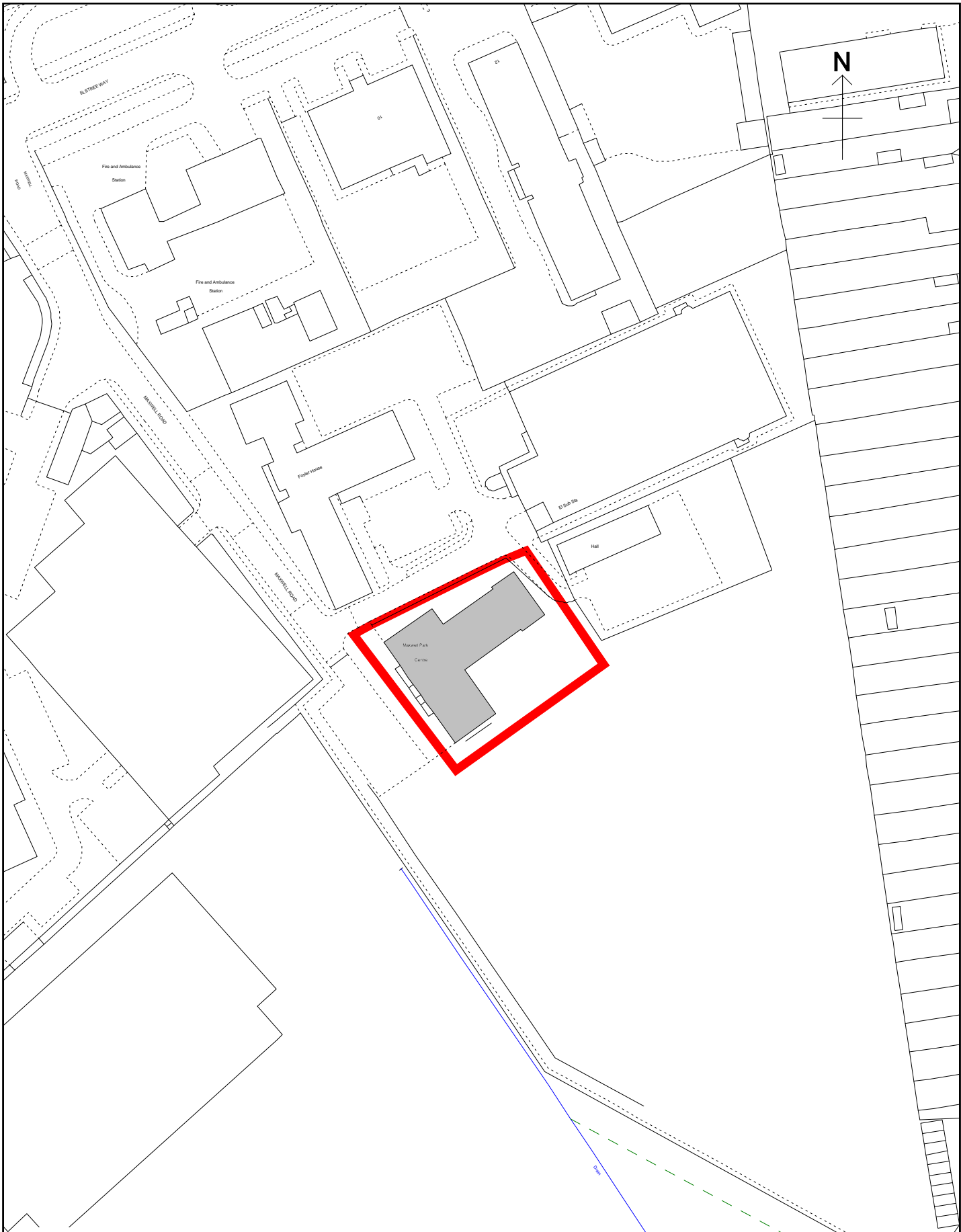
HCC Land Asset Plan

	Freehold
	Leasehold

Asset Name
**The Park Extended ESC
Key Stage 4 Centre
High Street
Potters Bar**


Terrier Ref.	J111
Site area	0.182 ha
Land Registry Title No.	Unregistered
Ordnance Survey map ref.	TL2601SW
Reference Date	01/04/2009
Event Change Date	00/00/0000
Operational Designation	
Drawn	M Flunder
Checked	LJ
Scale	1:1250
UPRN	00210301





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Hertfordshire County Council 100019606 2007

	Site Area	1764 m ²
	Block Area	624 m ²



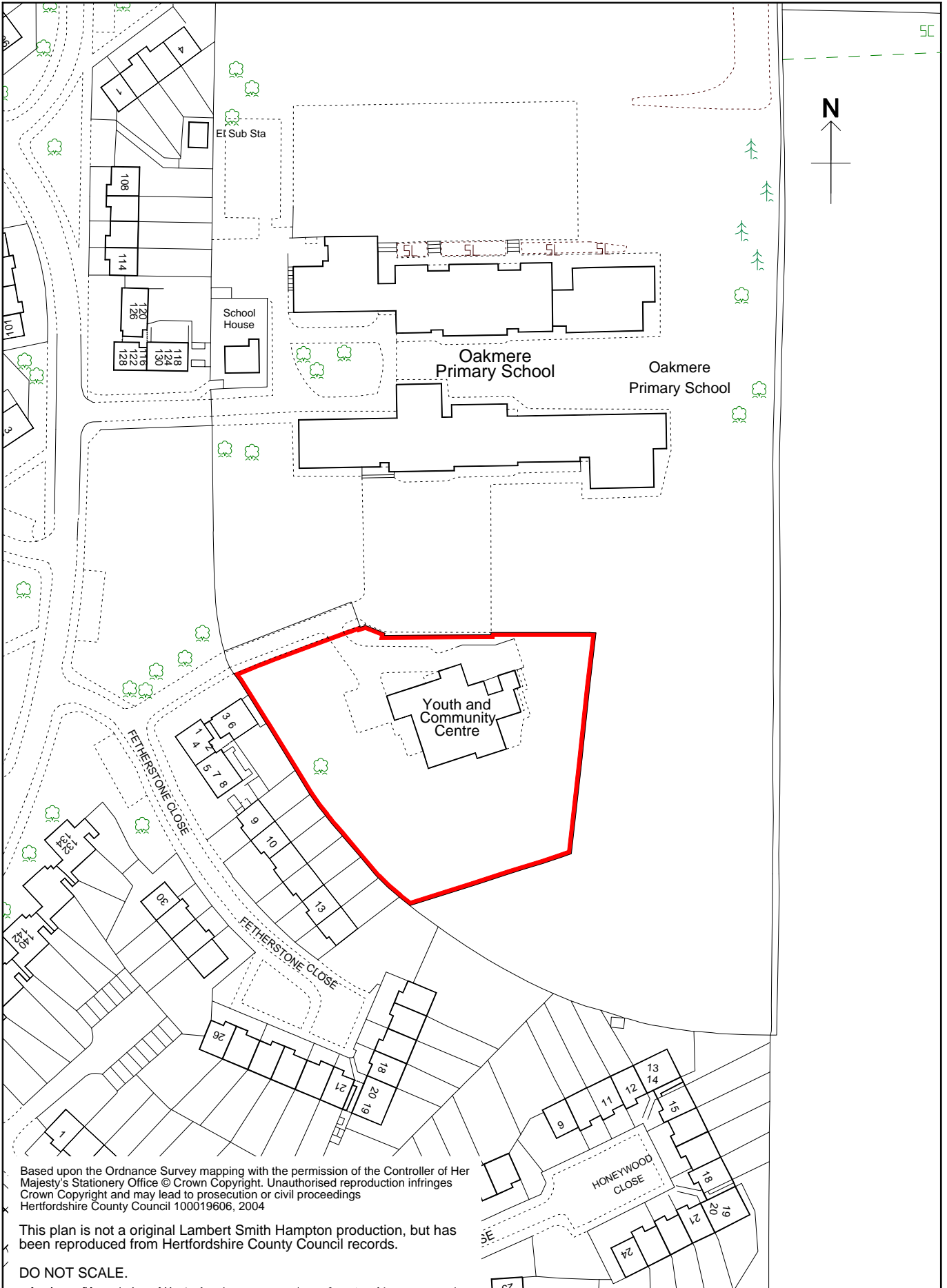
PROJECT
MAXWELL PARK YOUTH & COMMUNITY CENTRE
 MAXWELL ROAD
 BOREHAMWOOD

DRAWING TITLE
SITE LOCATION PLAN

DRAWN	JO-ANN BURKE	
CHECKED		
DATE	26/09/2007	
SCALE	NOT TO SCALE	
PLAN NO.	EM 12471	REVISION

O.S. Grid Ref. TQ 20 96 NW

PRINTED 28/09/2007

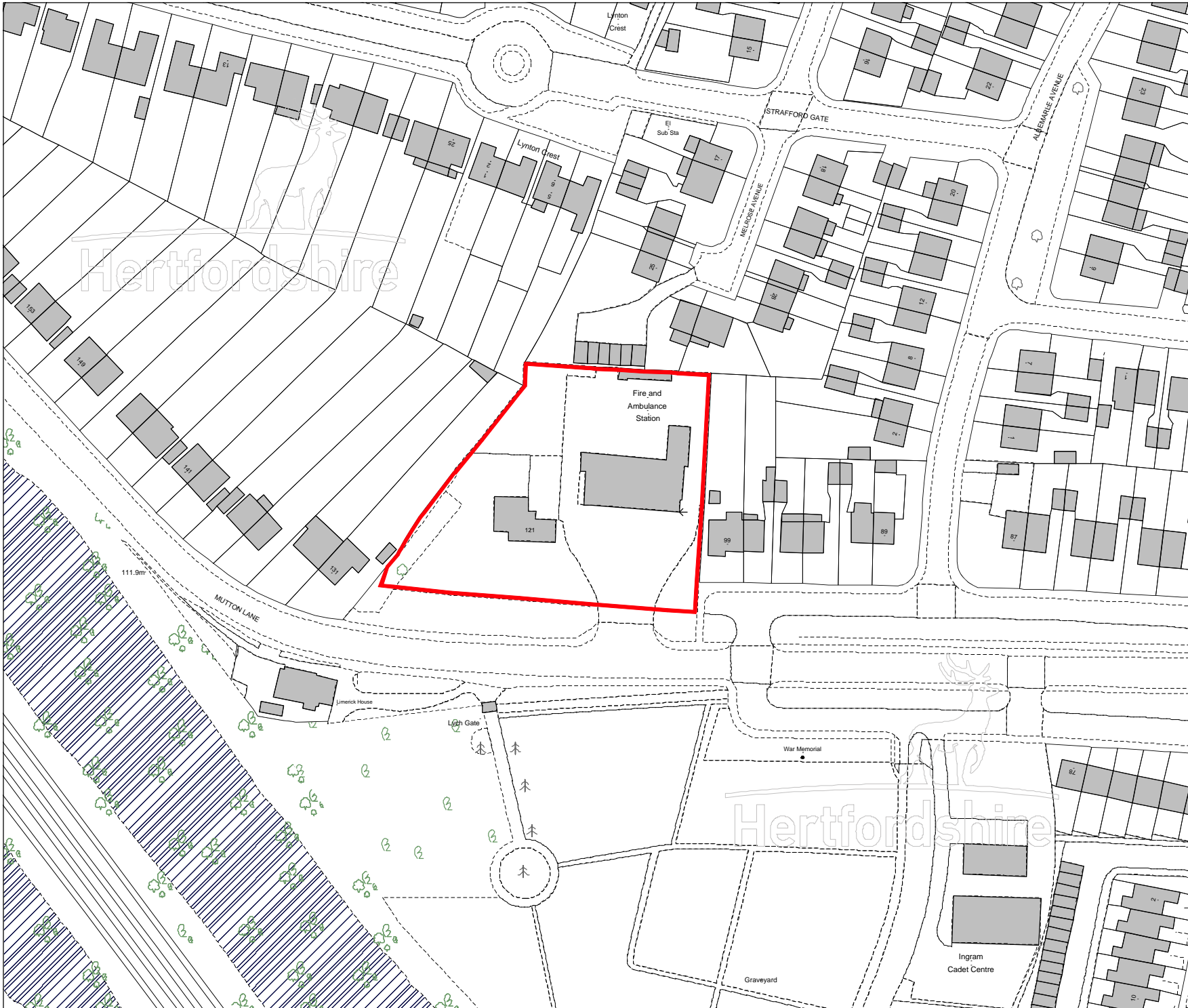


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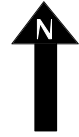

DO NOT SCALE.

	PROJECT POTTERS BAR OAKMERE COMMUNITY CENTRE		DRAWN			
				ASSET NUMBER		
			DATE DRAWN	06:04:04		
			SCALES	N.T.S.		
			JOB REFERENCE	ELEMENT	SEQUENCE NO.	REVISION
			EM 9559			
			O.S. Grid Reference TL 26 01			



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Hertfordshire

Corporate Services
County Hall
Pegs Lane
Hertford SG13 8DE

PROJECT

Potters Bar Fire Station
Mutton Lane
Potters Bar

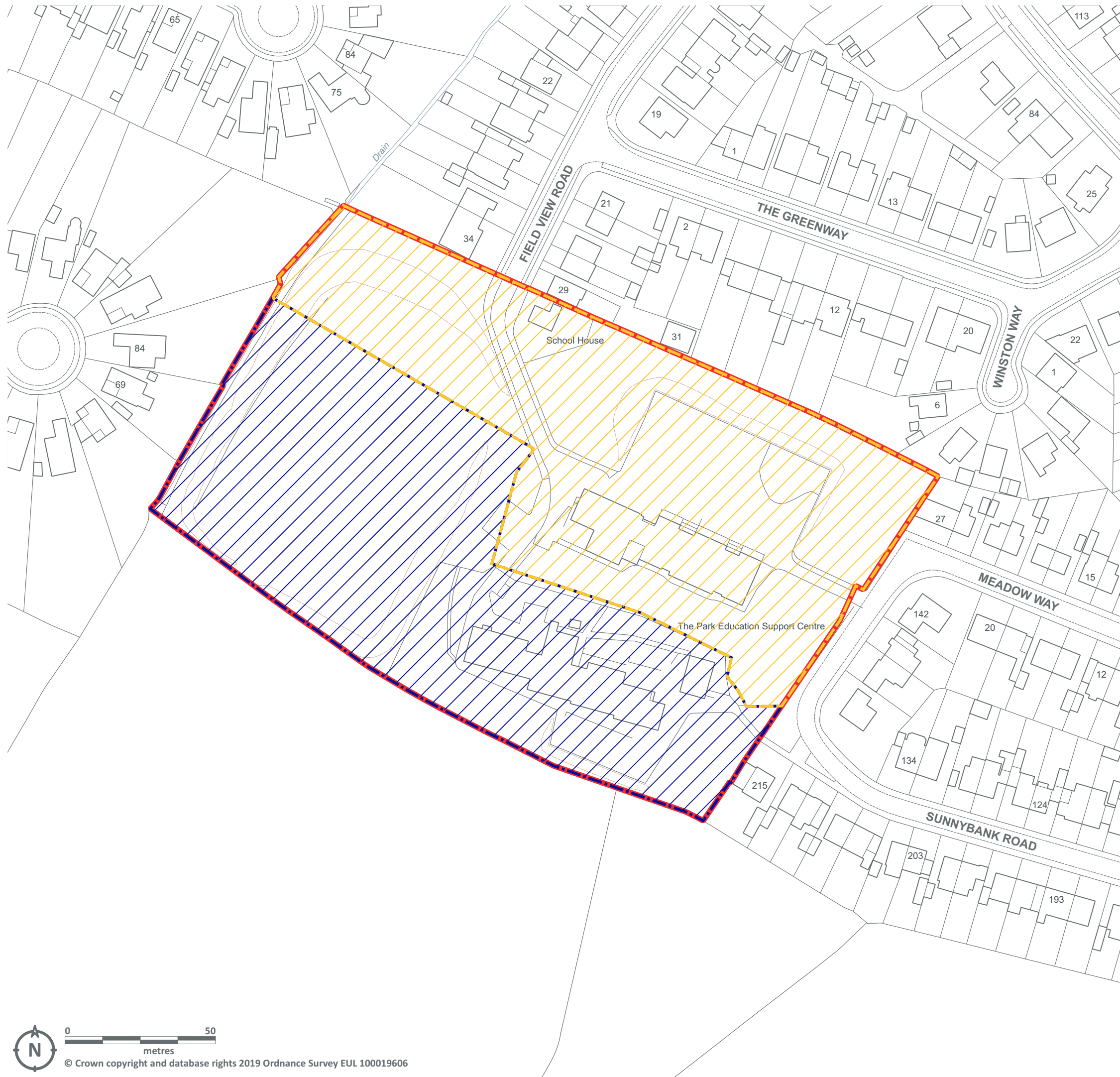
DRAWING TITLE

DRAWN	M Flunder
CHECKED	
DATE	04/10/2011
SCALE	1:1250
PLAN NO.	REVISION

HP 1916

04/10/11

APPENDIX TWO



- SUNNYBANK SCHOOL:
SITE BOUNDARY 2.91ha
- POTENTIAL RESIDENTIAL
DEVELOPMENT BOUNDARY 1.45ha
- POTENTIAL SEND SCHOOL
BOUNDARY 1.46ha

REVISION A:
Boundary amendments following client comment/confirmation
HNA/01-12-2021

HERTSMERE LOCAL PLAN SITES

Sunnybank:
Potential development boundaries

PROJECT NO	DRAWING NO	REV
5269	205	A
DRAWN	DATE	SCALE
HNA	NOVEMBER 2021	1:1250

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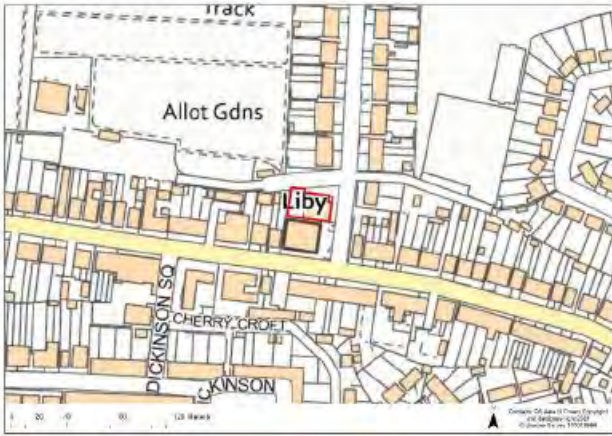
APPENDIX THREE

Three Rivers District Council Part 2 Local Plan Regulation 18 Sites for Potential Allocation Consultation June 2021

The following comments are provided by the property planning team on behalf of Hertfordshire County Council (HCC) as a landowner.

Croxley Green

CG65:

Site Ref.	CG65	Site	British Red Cross, Community Way	Size (ha):	0.06
			Current Use	British Red Cross building & ancillary car park	
			Dwelling Capacity	6	
			Green Belt	No	
			Phasing	11-15 years	
			Comments	<p>Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site. A detailed heritage impact assessment may be required prior to any development. The public right of way running along the northern boundary would need to be protected. Re-provision of the community facility would be required on-site.</p>	

Question 24

Do you agree that that Site CG65 is an appropriate development site? If not, please outline your reasons.

Response

The County Council as a landowner does not consider that site CG65 is an appropriate development site. This site is adjacent to an HCC library. It includes land that is held under lease by the County Council as access and parking for the library. As such development of this land would be detrimental to HCC's use.

Rickmansworth

CFS77:

Site Ref.	CFS77	Site	Rickmansworth Library	Size (ha):	0.1
				Current Use	Library
				Dwelling Capacity	7
				Green Belt	No
				Phasing	11-15 years

35

Comments

Redevelopment of the site would require the re-provision of the library facility in a suitable, accessible location. A modern, upgraded library with improved facilities and access is potentially proposed for provision in the adjacent Council Offices. There is potential for a commercial use on the ground-floor of the redeveloped site.

Suitable mitigation to address surface water flood risk and groundwater flood risk on the site would be required. The site is in Groundwater Source Protection Zone 1 so a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A detailed heritage impact assessment and archaeological assessment would also be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets.

Question 30

Do you agree that that Site CFS77 is an appropriate development site? If not, please outline your reasons.


Response

The County Council as landowner does not currently support the redevelopment of the Rickmansworth library site. We are not convinced that the proposal to relocate the library to the Three Rivers District Council (TRDC) offices will provide a suitable replacement for the current facilities. It would appear that property-based solutions are available, but the County Council would need to be assured that these are financially viable and do not adversely impact on delivery of library services. We would welcome further dialogue on the matter.

Oxhey Hall
The Fairway, Oxhey Hall

The site below is an existing housing allocation in the Oxhey Hall area. The site was allocated in the Site Allocations LDD (adopted 2014) but has not yet been built out. The site will therefore be carried forward into the new Local Plan.

H24:

Site Ref.	H24	Site	The Fairway, Green Lane, Oxhey Hall	Size (ha):	0.35
				Current Use	Residential care home
				Dwelling Capacity	32
				Green Belt	No
				Phasing	1-5 years
<p>Comments</p> <p>The site is an existing housing allocation in the Site Allocations LDD (adopted 2014). The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Development would need to take account of protected trees within the site and would need to provide suitable mitigation to address surface water flood risk on areas of the site. Delivery of the site depends on an alternative mode of provision being made for the care home. The site would be required to provide open space and play space.</p>					

Response

HCC as landowner support the inclusion of the site H24 for development. However, the County Council propose some amendments to the comments.

The Fairway care home closed because it was no longer fit for purpose. Residents were rehoused in other care homes.


We do not consider that the allocation needs to specifically reference provision of open space and play space for this site. We suggest this is replaced with 'open space provision to be provided in line with adopted standards'.

Planning consultants have been employed to undertake feasibility to prepare and submit a planning application for the development of this site. It is expected that the planning application will be submitted in early 2022.

South Oxhey

Former Sir James Altham School, South Oxhey

CFS52a:

Site Ref.	CFS52a	Site	Former Sir James Altham School, Little Oxhey Lane, South Oxhey	Size (ha):	1.3	
				Current Use	Former swimming pool & car park, grassland, vacant residential care home	
				Dwelling Capacity	43	
				Green Belt	No	
				Phasing	6-10 years	
<p>Comments</p> <p>The southern part of the site is an existing housing allocation in the Site Allocations LDD (adopted 2014) (Site H32). An archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets of archaeological interest and proposals would need to provide suitable mitigation to address surface water flood risk on areas of the site. The former swimming pool has now been replaced by a newly constructed facility in the locality. As part of any development, the residential care home on the site would need to be re-provided on the site or on an alternative site in the local area. Development of the site would also be required to provide an additional 15 car parking spaces and a coach parking space to serve Oxhey Jets Football Club which is adjacent to the site. The site would be required to provide open space and play space.</p>						

Question 56

Do you agree that that Site CFS52a is an appropriate development site? If not, please outline your reasons.

Response

HCC as landowner support the inclusion of the site(s) CFS52a for development. However, the County Council propose some amendments to the comments.

For clarity, the supporting text should explain that the site is now divided into two separate parcels, a northern parcel and a southern parcel. Adult Care Services (ACS) have confirmed there is an identified need for a new day service facility on site CFS52a to replace the existing facility at the Northwick/Anson House site (site reference BR20). In addition, ACS have also confirmed part of the allocation would be suitable for development of extra care housing as part of its wider strategy. Feasibility work is currently underway for a site wide masterplan to inform separate planning submissions for the day service and extra care. The Oxhey Jets club house facility is to be retained in the centre of the site, outside of the red line allocation.

Following a master planning exercise, the indicative ACS programme identifies that a planning application will be submitted for a new day service on part of site CFS52a in spring 2022. It is expected that a Registered Provider will make a planning submission for the extra care component around spring 2023.

In terms of the site area, it is noted that the existing allocation (Site Allocations DPD 2014) does not include the semi-detached properties containing 63 to 69 Lytham Avenue, or the adjacent Homeoaks care home (71 Lytham Avenue).

For avoidance of doubt, 63 to 69 Lytham Avenue is let long term to a housing provider and will not form part of any future redevelopment within the red line allocation. It should be removed from the allocation.


Homeoaks can form part of the red line allocation because the site is likely to form part of the wider development. Homeoaks is a purpose-built single storey residential care home for adults with learning disabilities, containing seven bedrooms, with shared kitchen and bathroom facilities. It was built in the late 1990s and has been vacant since 2012. It is uninhabitable due to severe settlement and may require early demolition. It would not be appropriate to require its re-provision on the site. The allocation comments should be amended to remove this requirement.

We are unsure why the need for an archaeological assessment and flood risk assessment are highlighted within the policy text over and above other evidence based technical studies. The two land parcels have quite different constraints, so we recommend the supporting text summarises that any application on the northern or southern parcel would need to be informed by a site wide masterplan and supported by 'relevant technical reports' as per the Council's Development Management Validation Checklist for planning applications.

We are also unsure why the supporting comments refer to an additional 15 car parking spaces to be provided for the Oxhey Jets. We suggest the supporting text is simplified to specify that 'car parking will be required to meet the needs of the development, including the retained Oxhey Jets club house'.

We do not consider that the allocation needs to specifically reference provision of open space and play space for this site. We suggest this is replaced with 'open space provision to be provided in line with adopted standards'.

Northwick Day Centre/Anson House

Site Ref.	BR20	Site	Northwick Day Centre, Northwick Road, South Oxhey	Size (ha):	0.56
			Current Use	Day centre	
			Dwelling Capacity	48	
			Green Belt	No	
			Phasing	1-5 years	
<p>Comments</p> <p>The site is part of an existing housing allocation in the Site Allocations LDD (adopted 2014) relating to the wider South Oxhey regeneration area (H29). Development would need to provide suitable mitigation to address surface water flood risk impacting the site and proposals would need to take account of protected trees within the site. The Northwick Road Day Centre facility would need to be re-provided in the local area as part of any development. The site would be required to provide open space and play space.</p>					

Response

HCC as landowner support the inclusion of the site BR20 for development. However, the County Council propose some amendments to the comments.

We do not consider that the allocation needs to specifically reference provision of open space and play space for this site. We suggest this is replaced with 'open space provision to be provided in line with adopted standards'.

The existing day care centre facility is to be re-provided on the Former Sir James Altham School site (CFS52a).

Planning consultants have been employed to undertake feasibility, prepare and submit a planning application for the redevelopment of this site. It is expected that the planning application will be submitted in early 2022.

Chapter 8 Education

Proposed Policy on Education Allocations

Three Rivers District Council will continue to work with the County Council, adjoining authorities and other interested parties to identify the most appropriate sites to meet identified educational needs.

Identified education sites for new primary or secondary schools will be safeguarded for educational use.

Question 75

Do you think the Proposed Policy for Education Allocations is the right approach? If not please identify how the proposed policy could be changed.

Response to Question 75

The County Council as landowner supports the approach suggested in the proposed policy on education allocations. However, the policy should also include reference to SEND schools.

The following additional site is suggested to be included under this policy:

Land West of Little Green School at Durrants Playing field (PCS 49)


This site is the former playing fields of Durrants School and is currently located in the green belt.

Part of the site has been identified as detached playing fields to enable future expansion of Croxley Danes school.

The remainder of the site is required for a new SEND school to serve the west of the county. The County Council is currently working up a scheme for this development. Feasibility is currently underway to identify the build zone of the new school.

The County Council as landowner wish the site to be identified for education. It is requested that it is allocated for this purpose in the Regulation 19 plan.

Proposed Education Allocations


Site Ref.	CFS11	Site	Carpenders Park Farm, Oxhey Lane	Size (ha):	8.2
	Current Use	Agricultural			
	Proposed Use	Secondary education			
	Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised to remove land for the construction of school buildings. Land developed for ancillary playing fields would remain in the Green Belt.			
	Phasing	1-10 years			
<p>Comments A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Development would need to satisfactorily address surface water flood risk on the site by providing suitable mitigation. Measures to avoid adverse impacts and enhance biodiversity would need to be provided due to the location of a Local Wildlife Site which is adjacent to the site.</p>					

Question 76

Do you agree that that Site CFS11 is an appropriate development site for a secondary school? If not, please outline your reasons.

Do you believe there are more suitable alternative sites? If so please provide details.

Existing Education Allocations

Site Ref.	S(c)	Site	Woodside Road	Size (ha):	2.5ha
	Current Use	Agricultural			
	Proposed Use	Primary education			
	Green Belt	Part of the site is in the Green Belt and is allocated for use as ancillary playing fields. The part of the site allocated as the build zone area is not in the Green Belt.			
	Phasing	1-10 years			
<p>Comments The site is an existing education allocation in the Site Allocations LDD (adopted 2014). The site is allocated for primary education use and has capacity for a 2 form entry primary school.</p>					

Response to question 76

Proposed Education Allocation Carpenders Park Farm

The County Council as landowner supports the allocation of site CFS 111 for secondary education.

In the event that there is residual land from the school there may be some capacity for residential development at the site. It is noted that land to the south is proposed for residential development including a primary school (Site Allocation CFS69a).

Existing Education Allocation Abbots Langley (site S (c) Woodside Road)

The continued allocation of this site for a reserve primary school is supported by the County Council as a landowner.

Additional sites

The following sites have not been included for allocation the consultation document. However, the County Council wishes to make TRDC aware of their availability for development. They are no longer required for County Council service use.

Abbots Langley

Margaret House Abbots Langley

This is a former care home site located near the centre of Abbots Langley. The care home closed in October 2020 because it's size, fabric, age and layout meant the building was unable to meet the increasing demand for those with specialist and complex care needs. Residents were rehomed in a variety of other care homes. The site area is 0.65 ha.

A planning application is being prepared for the redevelopment of the site for housing.

It is expected that the planning application will be submitted for this development in early 2022.

South Oxhey

Former Little Furze Playing Field, Ainsdale Road, South Oxhey, WD19 7HL (PCS18)

This site is not required for education use. It is therefore available for development.

Technical note:

Land at Carpenders Park Farm, South Oxhey – Proposed Secondary School Concept Masterplans

1. Introduction

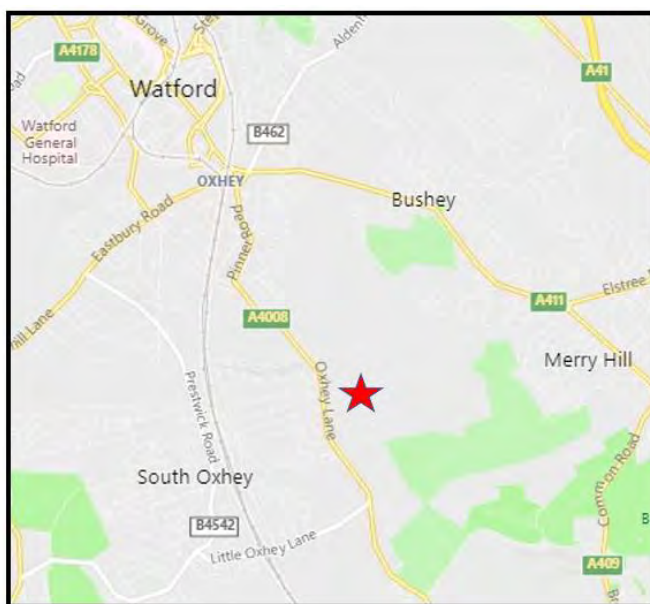
Undeveloped land off the A4008 /Oxhey Lane, Carpenders Park, South Oxhey is currently being considered as a potential site for a secondary school, plus ancillary residential development. To help support the site's allocation in a new Local Plan currently being prepared by Three Rivers District Council, Wood has been commissioned by the landowner (Hertfordshire County Council) to prepare a concept masterplan to illustrate how the site could look once developed.

This Technical Note provides details of two concept masterplan options. Appendix A provides details of site access considerations that have informed the concept masterplans.

2. Site Description

Land at Carpenders Farm Park (The Site) measures 20.87ha (51.57 acres), is located on the western fringe of South Oxhey and straddles the administrative boundaries of Three Rivers District and Hertsmere Borough. The location of the Site is shown in **Figure 1**.

Figure 1 Site Location



Source: www.bing.com/maps 2019

The Site is in agricultural use (pasture land) and is currently lies within designated Metropolitan Green Belt. It is bounded to the north, east and south by a combination of agricultural land and woodland. The Site's western boundary is defined by the A4008 (Oxhey Lane), beyond which is located the residential suburb of Carpenters Park.

Topographically, as shown on **Figure 2**, the Site slopes significantly with a level change of ~35m experienced between the south-east and the north-west corners. The steepest level change, however, is between the north-west corner and Site's western boundary close to the junction of Carpenters Avenue and the A4008

As is shown on the aerial photograph below, mature hedgerows and hedgerow trees subdivide the Site into smaller parcels of land.

Figure 2 Site Context and Topography



3. Development Requirements

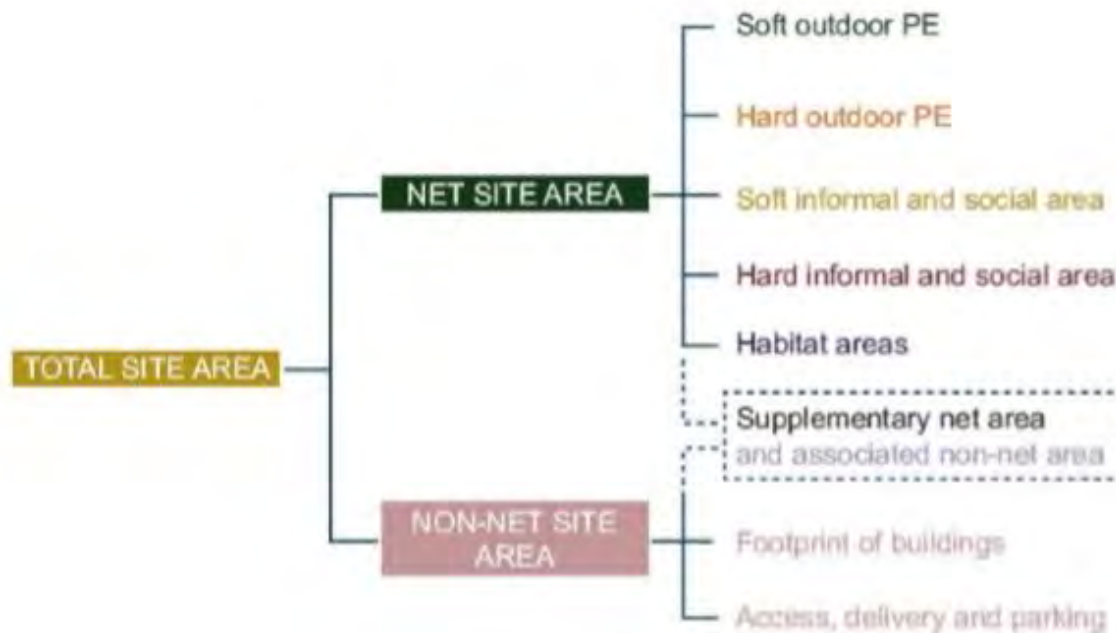
The maximum site area for a new 10FE secondary school on an unconstrained site outside of an urban area is, according to Building Bulletin 103¹, approximately 13.4ha, comprised of:

- **Net site area**, which is the usable site area available to pupils, and is also known as the 'playing field area'
- **Non-net site area**, which supports the functioning of the site and includes the footprint of buildings and access areas such as paths, roads and parking; and,
- **Supplementary area**, which is used for non-school or support functions such as specially resourced special needs facilities.

¹ Department of Education and Education Funding Agency, 'Building Bulletin 103: Area Guidelines for Mainstream Schools' (BB103), June 2014 updated March 2015. The Bulletin sets out non-statutory area guidelines for school buildings (part A) and sites (part B) for all age ranges from 3 to 19. It covers all state schools, including mainstream academies and free schools, except special schools and alternative provision.

<https://www.gov.uk/government/publications/mainstream-schools-area-guidelines>

The gross or total site area is the total of the net and non-net site area, with the categories broken down as follows:



The following table sets out the net and non-net site area requirements for a new 10 FE secondary school with 1,950 pupils on roll.

Table 1 Secondary School Recommended Site Areas

Recommended min/max site areas (10FE Secondary School/ NOR 1,950)	Site Areas	
	m2	Hectares
soft outdoor PE	74,250	7.43
hard outdoor PE (court)	3,325	0.33
soft informal and social area (inf rec)	4,500	0.45
hard informal and social area (playground)	2,150	0.22
habitat	975	0.10
float	10,550	1.06
min net site area	95,750	9.58
non-net site area	15,650	1.57
min total site area	106,500	10.65
Maximum net site area	106,500	10.65
Maximum total site area	133,850	13.39

Although these area requirements are approximate, and it is widely accepted that they are likely to vary during detailed feasibility /design work to support a planning application, in preparing concept masterplans for the Site they form the basis of the maximum land take requirements for the proposed secondary school.

4. Development Considerations

A limited desk-based appraisal has been undertaken to highlight key physical constraints, that have been taken into consideration in the preparation of the concept master plans presented in Section 5. These constraints are summarised below and highlighted on **Figure 6**.

4.1 Site Access

Based on the findings of a high-level access appraisal (Refer **Appendix A**), it appears that satisfactory access to serve a large secondary school plus residential development could be achieved into the Site off Oxhey Lane. The access solution recommended is a new signalled controlled junction at the existing junction of Carpenders Avenue and the A4008 (Oxhey Lane), which would offer several safety benefits including: safe pedestrian and cycle access into the Site; improvements over the existing priority junction which has poor visibility; and a highway feature that would help control vehicular speeds on the A-road.



Existing gated agricultural field access

Although there is one gated agricultural field access into the Site off Oxhey Lane, the location of this access is not considered suitable for it to be retained and upgraded to serve the proposed development. As illustrated in the above image, the agricultural field access is located close to a bend on the A4008 which restricts views of on-coming traffic.

While the length of highway frontage available means that it may also be possible to create alternative access points into the Site from Oxhey Lane, due to level changes associated with land adjacent to the highway, doing so might prove difficult and expensive to achieve. It is recommended that a more detailed highway and access assessment is undertaken to inform the most appropriate access solution in advance of a planning application being submitted.

4.2 Topography and visual impact

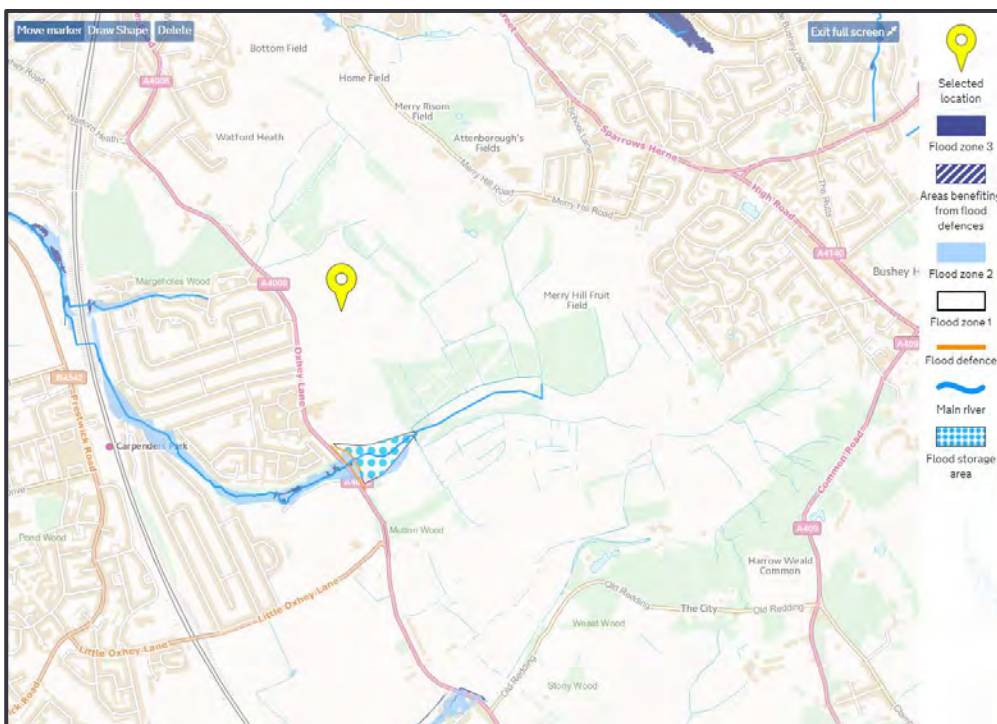
The sloping nature of the Site means that some major re-profiling would be required to accommodate development and, specifically, to establish level ground for sports pitches.

Having regard to the Site's topography, even if the land is removed from the Green Belt and allocated for development, development at this location will need to be sensitively designed to reduce its visual impact on visual receptors (including existing residents of Carpenders Park) and on the wider landscape.

4.3 Flood Risk

According to the Environment Agency's Flood Map for Planning (Rivers and Sea), the Site is in Flood Zone 1 and therefore in an area assessed as having a low probability of river flooding (refer **Figure 3**). However, it is important to note that the Flood Zones shown on the Environment Agency's Flood Map do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the latest available Strategic Flood Risk Assessment for the area when considering the potential future flood risks to development and land uses at this location, and preferably a flood risk assessment should be commissioned.

Figure 3 Flood Risk from Rivers



Source: <https://flood-map-for-planning.service.gov.uk/confirm/location?eastings=512008&northing=195403&placeOrPostcode=WD19%204AA>

Although the Site is in Flood Zone 1, some parts of the Site are identified as being at high-risk to surface water flooding. As illustrated on **Figure 4**, an area of high-risk runs along the northern boundary and across the north eastern corner of the Site. There is also a localised area of high-risk surface water running adjacent to Site's western boundary and it is assumed it is a consequence of surface water backing up where a water drains under the A4008 via a culvert i.e. the culvert acts like a throttle which is unable to convey the volume of water it receives under the road without some water backing up on to the Site.

Figure 4 Surface Water Flooding

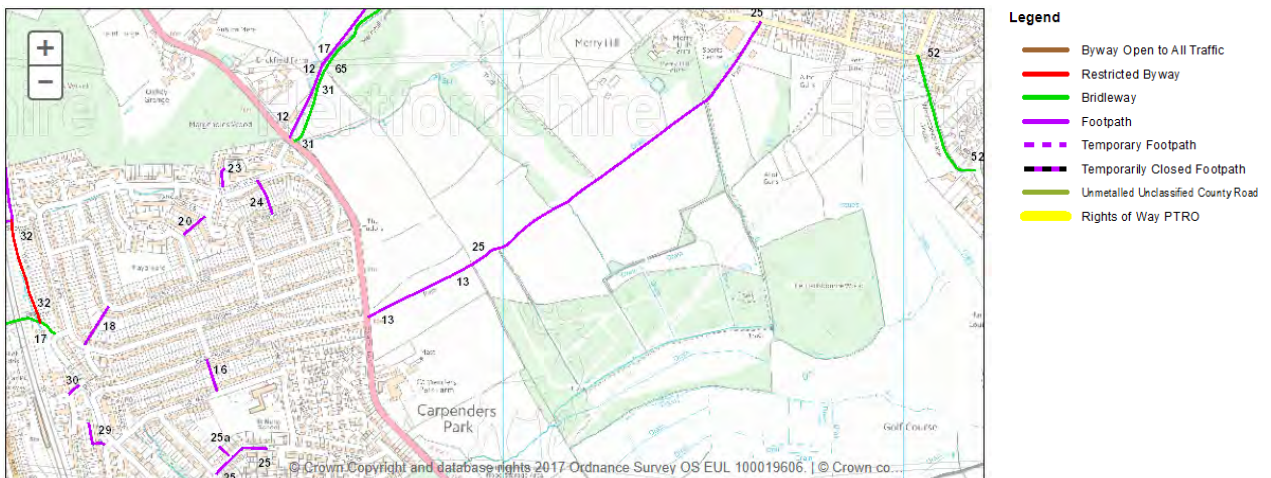


Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

4.4 Public Right of Way

Public Footpath Number 13 (PF13) runs east-west across the Site. It is also understood that an informal footpath runs in a north-south direction across the centre of the Site, linking PF13 with an area of open space/ amenity land (Merry Hill) which abuts the northern boundary. It is understood that this footpath is regularly used by dog walkers and other pedestrians seeking a short cut across the Site.

Figure 5 Public Rights of Way



Source: Rights of Way Map, Hertfordshire County Council

4.5 Utilities

Based on a Utilities Report produced in 2016 on behalf of HCC, it is understood that several utilities are present on Site, including: a distribution water main (Affinity Water) and overhead powerline (UK Power Networks).

The approximate location of these utilities and other potential development constraints are shown on **Figure 6** (the figure is also reproduced under **Appendix B**).

Figure 6 Site Constraints Plan



In preparing concept masterplans for the Site, it has been assumed that neither of these utilities would represent an overriding constraint to development but could either be diverted or protected in situ by ensuring development is offset from the utility by an appropriate buffer /easement.

5. Concept Masterplan Options

In response to the above, the following key factors have shaped concept masterplans for the Site:

- Site constraints;
- School land take requirements; and
- Vehicular access considerations.

5.1 Site constraints

To minimise the visual impact of the proposed secondary school, buildings have been positioned in the lower lying parts of the Site with the lowest lying areas identified for SUDS infrastructure.

Two concept masterplans have been prepared, the only difference between them being the proposed number of storeys for the main teaching/ admin block at the school and the total land take for the school. Option 1 (**Figure 7**) depicts a three-storey building and Option 2 (Figure 8) a two-storey building, though because of site level changes it is assumed a variant of the two options could be achieved without having any greater a visual impact over a two-storey building assuming the three-storey element is delivered on the lower lying part of the Site.

Although parts of the Site are understood to be subject to surface water flooding, for the purposes of preparing initial concept masterplans it has been assumed that this development constraint can be managed through a combination of land re-profiling, the introduction of SUDS and possible improvements to existing drainage infrastructure e.g. re-designed culvert under the A4008.

Figure 7 Concept Masterplan Plan – Option 1 (three-storey school)



Figure 8 Concept Masterplan Plan – Option 2 (two-storey school)



5.2 Land take / land use balance

The total site area measures 20.87ha and is enough to accommodate the maximum land take requirements for a 10FE secondary school as recommended in BB103 (13.39ha). However, having regard to topography and constraints associated with surface water flooding, it is considered that a larger area will be needed to make the site suitable for its intended end use.

Re-profiling has been assumed to establish level areas for sports pitches and a suitable platform to accommodate the main school buildings. SUDS infrastructure is proposed in the lowest lying parts of the Site adjacent to the A4008/Oxhey Lane, and adjacent to the northern boundary.

The following table sets out an indicative land use budget for the two concept masterplans.

Table 2 Land Use Budget (Gross Areas in Hectares)

	Option 1	Option 2
Education (10FE secondary school)	14.45	14.57
Residential	6.42	6.30
TOTAL	20.87 Ha	20.87 Ha

The land take areas for both the educational and residential elements includes an allowance for SUDS infrastructure, though the amount of land shown on the concept masterplans is for illustrative purpose only.

From the information presented in Table 2, whether school buildings are constructed to two or three storeys, there is limited change in the overall land take requirements for the secondary school. The reason for this is that the principle land take requirement is associated with the provision of soft and hard outdoor physical education facilities rather than buildings.

Based on a gross Site area of 20.87ha, subtraction of 14.45ha or 14.57ha to accommodate the maximum land take for the secondary school leaves a 'surplus' balance of between 6.42ha (Opt 1) and 6.30ha (Opt 2).

Under concept masterplan Options 1 and 2 we have presented an indicative residential scheme for approximately 96 dwellings on this surplus land, which, based on a gross to net ratio of 0.7 would equate to a net residential density of approximately 25 dwellings per hectare (refer Table 3). It is important to note that this density and scale of housing in part reflects the Site's topography and sensitive setting. The results of a more detailed assessment of development opportunities and constraints at this location could result in a higher or lower dwelling yield being achieved. Furthermore, assuming that land is removed from the Green Belt and residential development is accepted at Carpender's Park Farm, the potential scale of the residential development on the Site may also be directly influenced by what size of secondary school is ultimately required.

Table 3 Residential Yield

	Option 1	Option 2
Residential Area (Gross)	6.42	6.30
Residential Area (Net) based on Gross to Net Ratio of 60%	3.85	3.78
Number of dwellings	96	96
Net Density (dwellings per hectare) - rounded	25	25.5

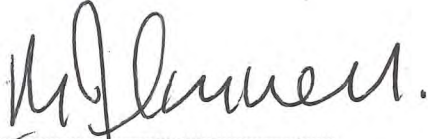
5.3 Vehicular access

As stated earlier in this Technical Note and in **Appendix A**, the proposed form and location for a vehicular access to serve the Site is via a new signalled controlled junction opposite Carpenders Avenue. From this junction the proposed access road can serve both the secondary school and new residential development on-site and, potentially, on adjacent land should that also be allocated for residential in the emerging Local Plan.

From the proposed main access road school traffic would be separated from residential traffic by way of a dedicated secondary access serving only the school. This secondary access would allow parents and school buses to drop-off children without directly impacting on new residents. An alternative access arrangement might be possible, with a school only access provided off the A4008/ Oxhey Road but a detailed access assessment is recommended to confirm whether this is possible.

End.

Issued and approved by



Michael O'Connell

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Appendix A Preliminary Access Appraisal



Appendix A - Preliminary access appraisal for proposed development on land at Carpenters Park Farm, South Oxhey

Background and purpose

Previously undeveloped land off the A4008 /Oxhey Lane, Carpenters Park, South Oxhey is currently being considered as a potential site for a secondary school (with ancillary residential development) within a new Local Plan being prepared by Three Rivers District Council. To help support the site's allocation in the Plan, Wood has been commissioned by one of the landowners (Hertfordshire County Council) to prepare concept masterplans to illustrate how the site could look once developed. In support of this work, and to help inform masterplan options, this Appendix identifies what is likely to be the most suitable location for a vehicular access road to serve the site.

Scope

The findings and recommendations set out in this Appendix are based on a desk-top appraisal. In advance of any future planning application for proposed development on the site, it is recommended that a detailed site access assessment based on a site visit is conducted.

Context

The site measures approximately 21ha (52acres) and straddles the administrative boundaries of Three Rivers DC and the Hertsmere BC. The location of the site is identified on **Figure 1** and its physical extent in **Figure 2**.

It is understood that a minimum of 13.38ha is the stated requirement for the secondary school to meet the needs of 10 forms of entry.

Figure 1 Site Location



Source: www.bing.com/maps 2019

Local highway infrastructure

The A4008 (Oxhey Lane) is a single carriageway with a narrow, varying width footway along the southbound side of the carriageway. A narrow, varying width footway is also present intermittently along the northbound side of the A4008.

Street lighting is present and localised traffic calming measures, including safety cameras, are also located along Oxhey Lane adjacent to the site.

The A4008 is subject to a 40mph speed limit although the actual vehicle speeds (based on speed surveys) are not known at this stage has not been established. Existing accident data has not been considered at this stage also.

Figure 2 Local Highway Network



Aerial image © 2019 Microsoft

It is generally understood that that Carpenders Avenue is a busy residential side road, serving as an access route to Carpenders Park Overground Station, St Meryl School, Carpenders Park Community Hall, neighbourhood retail and other local amenities.

Carpenders Park Railway Station is located approximately 700m from the junction of A4008 and Carpenders Avenue, from where the station is signposted. The station is also signed for pedestrians and cyclists from Carpenders Avenue / Delta Gain via Gibbs Couch.

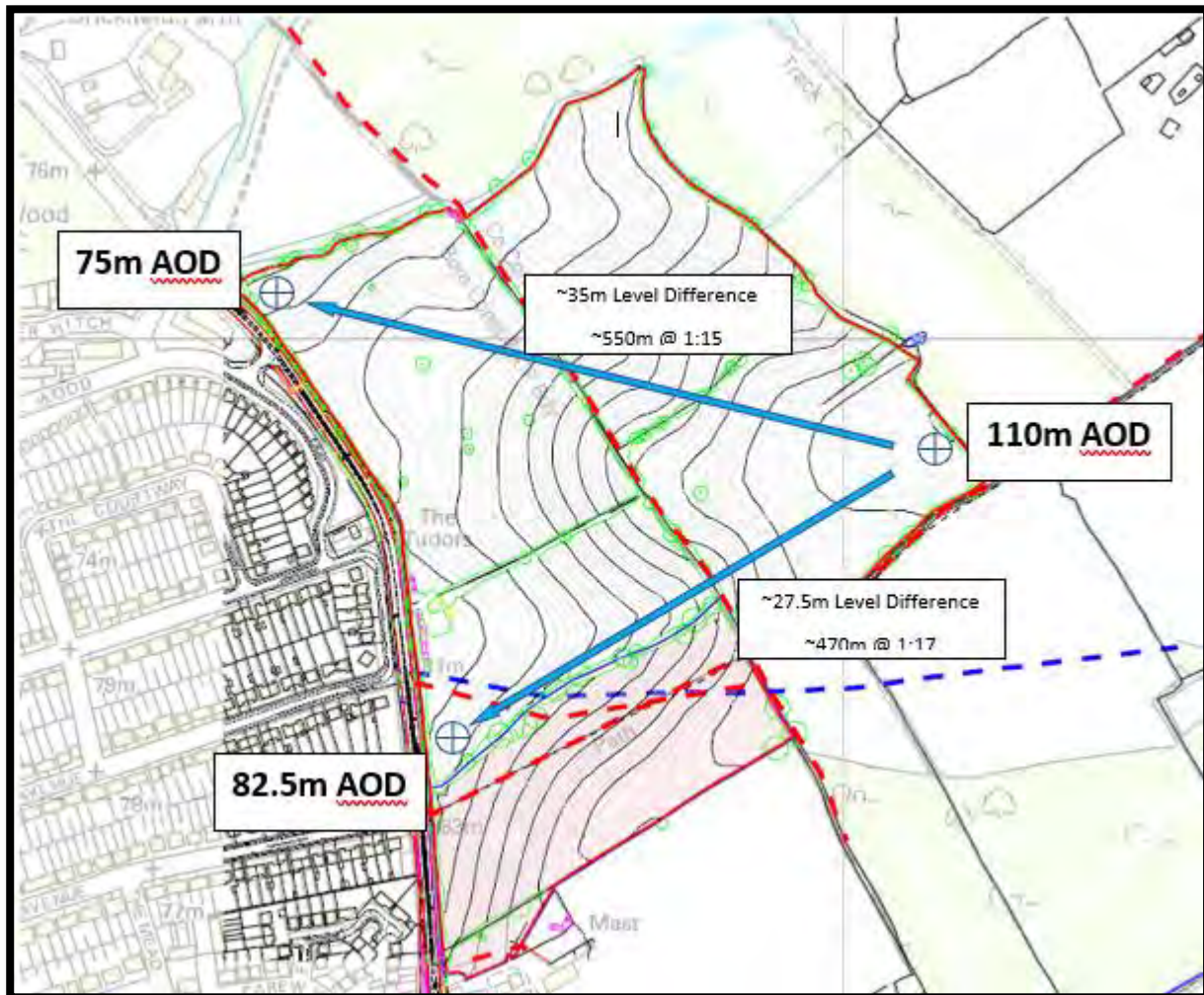
Two bus services (R16 and R17) serve the Carpenders Park residential estate along Little Oxhey Lane to the south and By The Wood to the north. The latter service operates directly passed the northern most part development site along the A4008.

There are no National Cycle Networks in the proximity to the site.

Local topography

The topography of the Site and the A4008 are variable. The development site has a considerable level difference of ~35m, falling from the south-east corner to the north-west development corner. The A4008 has a varying vertical profile which should be considered in detail as the scheme proposals develop.

Figure 3 Site Topography



The site is constrained beyond the back of public highway on the western side of the A4008 due to level differences, including retaining structures and vehicle restraint systems between the highway and adjacent residential properties. The back of the existing public highway to the western side of the A4008 should be considered the baseline for any associated footway/carrageway widening works to facilitate the development.

Based on the desk top audit, it is apparent that statutory utilities are present within the development area and public highway. This needs to be investigated on site and discussions should be held with the affected utility companies with designs updated to mitigate costly diversion and/or protection works.

Development Access Form

Based on the desktop audit and preliminary consideration of highway opportunities and constraints, the preferred location for an access to serve the development site would be opposite Carpenders Avenue.



A4008 Oxhey Road / Carpenders Avenue Junction

At this location the existing A4008 carriageway is ~7.3m wide, widening to ~10.5m over a distance of ~75m to accommodate a ~70m right turn filter lane for traffic turning from the A4008 into Carpenders Avenue. Forward visibility to Carpenders Avenue can be achieved to approximately 130m in both northbound and southbound directions along the A4008.



Northbound Forward Visibility to Carpenders Avenue (~130m)



Southbound Forward Visibility to Carpenders Avenue (~130m)

Forward visibility to a new development junction would need to be designed in accordance with the Local Highway Authorities requirements, expected to be the Design Manual for Roads and Bridges (DMRB) including any associated design guidance considered relevant.

Stopping Sight Distance (SSD) for a 40mph speed limit would require a 70A design speed, resulting in a desirable minimum SSD of 120m.

As referenced earlier, there is a significant level difference between the existing public highway and adjacent private properties on the northbound approach to Carpenders Avenue. Carriageway widening works in an easterly direction, i.e. beyond the back of existing public highway, in this location should be considered as significant and requiring 3rd party land /property acquisition.



Reduced Level Properties at the Junction of A4008 Oxhey Road / Carpenders Avenue

As set out in DMRB TD42/95 para 7.4, current visibility from Carpenders Avenue onto Oxhey Road (A4008) should be measured as 9m setback from the give-way to a distance of 120m along the A4008. High level planting currently compromises the 9m setback into Carpenders Avenue, however this setback can be relaxed down to 4.5m, or, in extreme circumstances, to 2.4m to achieve the required 120m visibility along the A4008.



Existing visibility to the left from Carpenders Avenue onto the A4008



Existing visibility to the right from Carpenders Avenue onto the A4008

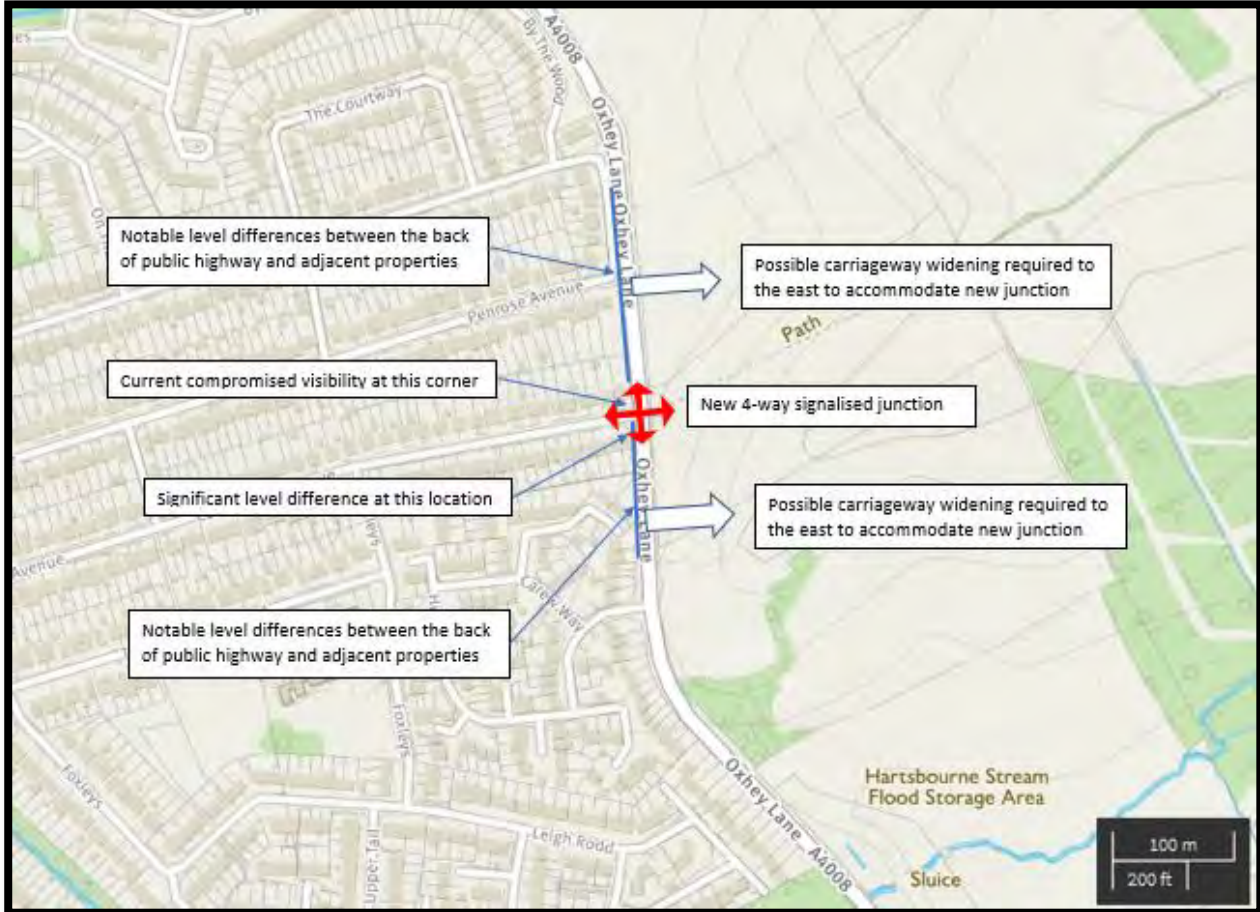
Proposed Development Access

It is considered feasible and desirable to create a single combined junction at the A4008 / Carpenders Avenue junction to accommodate both the school and residential access requirements. It is considered that a new 4-arm signalised junction, designed in accordance with DMRB: Volume 6 - TD 50/04, would be the most appropriate junction form in this location.

The new 4-arm signalised cross roads could be installed to accommodate all traffic movements, assigning priorities at key times of the day, and full integration of pedestrian crossing facilities. However careful

consideration should be given to the design of the junction and signal staging/phasing arrangements to mitigate any shortfall in inter-visibility at the junction.

Figure 4 Site Access Option



The junction layout would be subject to concept design and junction modelling however, it is assumed that a DMRB standard junction could be accommodated in both directions along the A4008. Pedestrian crossing facilities should be incorporated into the signal design, the optimum provision to be identified through junction modelling. Localised widening to the eastern side of the A4008 is likely to be needed to accommodate the new junction and associated footway / pedestrian access.

The new traffic signal installation should be supplemented by appropriately positioned advanced warning signs on all approaches to the junction. Further consideration should be given to a localised reduction in speed limit to further enhance safety. Any traffic calming proposals would to be discussed with the highway authority.

Additional consideration should be given to the creation of new bus stops in the vicinity of the development, along the northbound and southbound sections of the A4008 and Carpenders Avenue. Bus stops should be positioned in accordance with the highway authority's design standards.

Careful consideration should also be given to school parking provisions (staff and parents / visitors) as well as drop-off and pick-up locations accordingly. Traffic Regulation Orders (TROs) should be reviewed and amended along the A4008 and Carpenders Avenue, as necessary, to ensure that junction approaches and pedestrian areas remain clear of parked vehicles.

Access Concept Stage / Delivery Risks

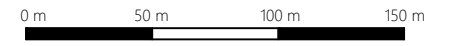
1. Northbound/Southbound A4008 forward visibility to signal heads cannot be achieved
Mitigation: Consider high mast poles and/or advance warning signage
2. Sunrise in the east may impair forward visibility to the Carpenders Lane traffic signal heads.
Mitigation: Adequate backing boards to the signal heads to be included within the signal design.
3. Significant level differences with adjacent land
Mitigation: The outer limit of works to be defined without impact on adjacent properties.
Carriageway/footway widening areas to be limited to the eastern corridor, within the development area footprint.
4. The existing public highway drainage network is unknown or may not be adequate to accommodate the new development and/or public highway works
Mitigation: Early planning of drainage, SUDS and attenuation measures to support scheme feasibility
5. Large trees /established hedgerows to be removed as part of the scheme proposals
Mitigation: It is not known if any Tree Preservation Orders (TPO's) are present along the route. Ensure a programme of tree replacement /planting is incorporated into the scheme and local area.
6. Existing statutory utility apparatus is affected within the works area.
Mitigation: Advance enquiries and discussions to take place with all utility companies. Mitigation measures to be incorporated into the developed scheme.
7. Public Rights of Way (PROW's) and existing footways across the existing site
Mitigation: Ensure PROW's and/or existing footway provisions are maintained, or appropriate alternative are accommodated within the scheme development.

End.

Appendix B Concept Masterplan Options and Constraints Plan



- Key
- Site Boundary (20.87ha)
 - 10FE Secondary School (14.45 ha)
 - Residential (6.42 ha)



Scale 1:3,000 @ A3
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Client

Hertfordshire

Carpenders Park Farm, South Oxhey


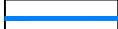

Concept Plan Option 1

June 2019

wood.



Key

-  Site Boundary (20.87ha)
-  10FE Secondary School (14.57 ha)
-  Residential (6.30 ha)

0 m 50 m 100 m 150 m

Scale 1:3,000 @ A3

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Client



Carpenders Park Farm, South Oxhey

Concept Plan Option 2

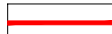









June 2019



wood.

H:\Projects\42019 South Oxhey Secondary School\Design\Technical\Drawings\Constraints Plan.dwg Originator: BETTINA.BERNARD



- Key
-  Site boundary
 -  Possible SUDS
 -  Flood zones
 -  Existing trees/hedges
 -  Low points
 -  High points
 -  Slopes
 -  Affinity water
 -  UK power networks
 -  Contours

0 m 500 m
 Scale 1:10,000 @ A3

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Client



Carpenders Park Farm

Site constraints plan

June 2019



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