

Ryan Bennett
Clerk to the Council



The Council Offices
Community Way
Croxley Green, Rickmansworth
Hertfordshire WD3 3SU

Claire Westwood
Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Hertfordshire
WD3 1RL

Dear Claire,

Croxley Green Parish Council objection to 20/1881/FUL | Demolition of existing buildings for residential development comprising two-storey houses and three-storey blocks of flats (160 dwellings in total), together with car parking, landscaping, and other associated works | Killingdown Farm Little Green Lane Croxley Green Rickmansworth Hertfordshire WD3 3JJ

Croxley Green Parish Council objects to the above application with concerns over site access, the detrimental effect on the Conservation Area, the proposal not meeting policies CA1 and PR01 of the Croxley Green Neighbourhood Plan, a lack of infrastructure contained in the plans and the further strain on existing resources and further issues around the environment, climate change and sustainability

Croxley Green Parish Council has studied the many documents provided by the applicant and some of the responses from other consultees.

The site was removed from the Green Belt and included in the site allocations document despite objections from the Parish Council and many residents. The Parish Council continues in the view that it would prefer this site not to be developed, to preserve the rural character of the area, protect the Conservation Area and the setting of the listed buildings.

Nevertheless, the Parish Council accepts that the decision to allocate this site for development was approved by the Inspector and part of the proposed site for development is included in the Local Plan Site Allocations. The part required for environmental mitigation was NOT included in the Local Plan Site Allocations and the Parish Council has reservations about the proposed development on this part of the site, which is adjacent to but outside the Parish Area and is on Green Belt land.

Access

The proposed development of 160 dwellings will create a great deal of additional traffic and we note the correspondence with Hertfordshire County Council about vehicle access.

We believe that the analysis by TPA is deficient in a number of ways.

Firstly, by considering the site as being in a walkable neighbourhood. Whilst people are likely to walk locally for exercise, most of the local facilities in Croxley Green are some distance from the site – for example the underground railway station – and we anticipate that residents are likely to use cars for many of their local trips, for employment, education, shopping and to access medical services. We consider that TPA has significantly underestimated the likely number of vehicles to and from the site, particularly in the peak periods. The consequence is more traffic on Little

Green Lane and at the junction with Baldwins Lane, and more vehicles parked within the development site.

We are also concerned that the traffic analysis at the junction seems to treat the staggered junction at Baldwins lane as two separate junctions. It is in fact an offset crossroads and much of the traffic to and from the site is likely to cross Baldwins Lane to the Green. We believe that the trip generation model should be rerun on the basis of a car dependent development and that the capacity of this junction should be analysed with background traffic growth as this can be a tricky junction at the best of times and it will become very difficult with increased traffic from Little Green Lane.

Little Green Lane has no proper sight lines down Baldwins Lane and is dangerous to exit. The large increase in volume of traffic at this junction would be a major traffic hazard. To create a safe junction, it would either require an encroachment onto The Green to widen the road or the installation of traffic lights and neither of those options are acceptable in a Conservation Area.

We also note that there has been no swept vehicle analysis for access to the rest of Little Green Lane, which will be required for service and emergency vehicles, and for farm vehicles to access adjoining farm land along the rest of Little Green Lane. We consider that access to Little Green Lane from the Sarratt Road or at the Lincoln Drive junction is not adequate to meet the needs of the houses at Little Green or the adjacent farmland.

CGPC request that alternative access to the site be made from Grove Crescent to alleviate these concerns.

Environment & Biodiversity

CGPC believe that the development of the Killingdown Farm site will have a detrimental impact on existing wildlife in the area. CGPC request that a Nature Conservation Management Plan must be carried out prior to any works being started to identify impacted wildlife and arrange for relocation of wildlife. The plans also state that the development will result in a net-gain of biodiversity, but we feel this will be too hard to prove and should not be used as an advantage for the development. We note the proposal to retain some of the trees and hedges within the site and to supplement them by gardens. However we doubt that small semi-urban gardens can compensate for the well-established pastures on the site and consider additional mitigation is needed

Climate Change & Sustainability

The Croxley Green Neighbourhood Plan Aim 5 states that “all new buildings...in the parish should be designed and constructed to the highest standards of energy efficiency and to be carbon neutral”. In 2019 TRDC recognised the climate emergency and committed to making its own operations carbon neutral by 2030, and to helping the district achieve the government target of net zero carbon by 2050. The proposed development falls well short of attempting to meet these aspirations. The outdated energy methods proposed by the developer would be in place for centuries and it will be more costly for future owners of the homes to retrofit sustainable energy sources.

We are very concerned that the developers are proposing a development that is NOT to the highest environmental standards. We accept that the Government has set a minimum standard for new dwellings but we believe that TRDC should seek a much higher standard for this development, as a showcase of what can be achieved in terms of reducing carbon emissions from new buildings, and as a benchmark for the future development we anticipate will be required within the district over the next decade.

Parish councillors have spoken to the developers about achieving a higher standard and the developers have confirmed that they have designed the shell of the buildings to a higher

standard. However, they are not planning to install low energy systems (such as heat pumps) or energy capture systems (such as solar panels) and claim that the cost would be prohibitive. We understand from the BRE that the cost of retrofitting such systems (which will be needed to meet the Government's zero emissions targets) is several times higher than the cost of designing and fitting them in new buildings. This seems a golden opportunity to modify the design of the buildings to accept such systems without modification and offering them as an additional option for forward looking purchasers.

For example, by having an illustrative design for a system that could be fitted immediately and then providing the necessary spaces, cavities and ducting to make installation cheap and straightforward.

We note that no consideration has been given to the need for electric vehicle charging points (which will be required within a few years) or to provision for the storage of bicycles (which are likely to become more popular for local journeys, particularly electric bicycles and bicycles towing attachments for luggage or small children)

Conservation Area & Design

The developer has made little or no distinction between the part within the Conservation Area and the part outside the Conservation Area, with a detrimental impact on the Conservation Area and the setting of the listed buildings. We share the Conservation Officer's concern about the impact on the Area and the heritage buildings and the findings in the report from Tetrick Planning regarding the scale of housing contained within the Conservation Area.

We have concerns that the developer has attempted to increase the capacity of the site by removing part of the site area allocated for development from this proposal (the listed buildings and the farm curtilage) and by placing environmental mitigation measures off site (on adjoining land in the Green Belt).

In our view this leads to an overly dense development of the site with the potential for additional development on the farm building area which includes listed buildings. For these reasons we feel the development does not meet either Policy CA1 or PR01 of the Croxley Green Neighbourhood Plan.

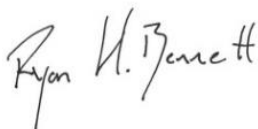
Infrastructure

The development of the Killingdown Farm site equates to around a 3% increase in both housing stock and population size. CGPC is disappointed that there has been no provision made for healthcare, retail, or recreation space. The area of north Croxley Green suffers from intermittent water shortages, and regular burst water piping, and the development will increase the strain on already stretched resources.

The Green

Any attempt to reduce the size of the Green will be strongly resisted by the Parish Council.

Yours sincerely,



Clerk to the Council