

**Appendix 8 - REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Green and Blue Infrastructure**

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S / COUNCIL'S PROPOSED ACTION
<b>Q20. Do you think the Preferred Green and Blue Infrastructure Network is the right approach?</b>						
SC_P1_Sport England	Sport England	Yes	<p>The preferred policy option for Green and Blue Infrastructure is supported as it supports a net gain in the quality and quantity of Green and Blue Infrastructure which would include spaces suitable sport and physical activity.</p> <p>The proposals in parts 4 and 5 of the policy to improve connectivity between key assets in the Green Infrastructure network and to protect/enhance public rights of way are particularly supported as this would help safeguard and improve opportunities for physical activity. This policy would accord with Government policy in paragraphs 91 and 97 of the NPPF in this respect.</p>	<ul style="list-style-type: none"> <li>• Supports policy as it supports a net gain in the quality and quantity of Green and Blue Infrastructure which would include spaces suitable sport and physical activity.</li> <li>• The proposals in parts 4 and 5 of the policy to improve connectivity between key assets in the Green Infrastructure network and to protect/enhance public rights of way are particularly supported as this would help safeguard and improve opportunities for physical activity. This policy would accord with Government policy in paragraphs 91 and 97 of the NPPF in this respect.</li> </ul>	Noted	No action
P1_002 14_Natural England	Natural England	Yes	<p>Natural England wants to see the character of protected landscapes conserved and enhanced. Therefore, we welcome the criteria set out for appropriate development within or impacting on the Chilterns Area of Outstanding Natural Beauty (AONB), including encouraging enhancement of the AONB and presumption against major developments within the protected landscape. We would recommend a requirement for Landscape Visual Impact Assessments (LVIA) to be undertaken for developments within the protected landscape or its setting. Also, we would advise consultation with the Chilterns Conservation Board on developments relating to the AONB.</p>	<ul style="list-style-type: none"> <li>• Agree with approach;</li> <li>• Recommend a requirement for Landscape Visual Impact Assessments (LVIA) is undertaken for developments within protected landscape/ its setting.</li> <li>• Consult Chilterns Conservation Board on developments relating to AONB.</li> </ul>	Noted	No action
SC_00 020_Chorleywood Parish Council	Chorleywood Parish Council		<p>Green Infrastructure as defined is a welcome national policy and the commitment of the 'to conserve and enhance the District's Green and Blue Infrastructure, which will help to improve the District's Green and Blue Infrastructure network and ensure its multi-functional benefits are achieved' is to be applauded. However, this policy seems to be at odds with the specified approach to the protection of the Green Belt when often the areas defined are one and the same.</p> <p>19.2 lists a number of important sites as 'key assets' and it is recommended that this list should include and name Chorleywood Common and Chorleywood House Estate as both cover a significant amount of land.</p> <p>19.2 suggests that it is only the corridors between key assets will be improved. This approach is flawed and would be at odds with the declared policy of having 'the aim to improve the District's Green and Blue Infrastructure network. It is vital that links between all Green and all Blue sites are properly maintained as any site that becomes cut off from the wider Green Blue Network will automatically suffer</p>	<ul style="list-style-type: none"> <li>• Policy seems to be at odds with the specified approach to the protection of the Green Belt when often the areas defined are one and the same.</li> <li>• 9.2 lists a number of important sites as 'key assets' it is recommended that this list should include and name Chorleywood Common and Chorleywood House Estate as both cover a significant amount of land.</li> <li>• 19.2 suggests that it is only the corridors between key assets will be improved. This approach is flawed and would be at odds with the declared policy.</li> <li>• It is also vital that the corridors are of sufficient width and nature to enable wildlife to confidently move through them.</li> </ul>	Noted. Green belt is a policy designation with specific purposes for including land within it. Green infrastructure is a broad term to define a "network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities". The two are not the same.	No action

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			from a negative impact on the sustainability on flora and fauna (particularly those that are land based) and a reduction in its biodiversity. It is also vital that the corridors are of sufficient width and nature to enable wildlife to confidently move through them. The suggested 20m buffer around Rights of Way is an improvement over the current situation. However, when a footpath is currently through open green spaces this buffer should be increased to 30m or 40m.	<ul style="list-style-type: none"> <li>The suggested 20m buffer around Rights of Way is an improvement over the current situation. However, when a footpath is currently through open green spaces this buffer should be increased to 30m or 40m.</li> </ul>		
SC_00 023_Cr oxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council considers there should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity. We endorse the comments from Jed Griffiths' statement about the importance of the local chalk streams; the need to define "key assets"; the importance for preserving and enhancing connectivity between sites; and the need for wide buffer zones. Otherwise we support the approach in general.	<ul style="list-style-type: none"> <li>There should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity</li> </ul>	Noted. The policy will be amended to reflect the importance of, protection and enhancement of key assets.	Amend policy to reflect HCC comments.
SC_00 024_Ab bots Langley Parish Council	Abbots Langley Parish Council		This also relates to item 12, the amount of green and blue infrastructure needs to be enforced with all new development both on the site and on the borders, new site should also have to provide funding to the greening of interconnected spaces.	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	Noted and agreed.	No action
SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Preferred Policy Option 19, Green and Blue Infrastructure.</p> <p>The county council supports the direction and intent of this policy but have a few concerns regarding insufficient land allocation to ensure that the infrastructure is managed and maintained, and therefore the following additions have been proposed: It is suggested that the wording within paragraph 1) is also amended as follows:</p> <p>1) <u>The Council will seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces.</u>  <u>a. Where land is provided or identified for Green and Blue Infrastructure purposes as part of a development proposal, applicants will be required to provide appropriate land management and maintenance plans.</u>  <u>b. Stewardship plans and funding arrangements will also be required on major developments or ecologically sensitive sites."</u></p> <p>The district council should note that the Local Biodiversity Action Plan will shortly be updated and replaced by the Local Nature Recovery Strategy required under the Environment Bill. HCC also suggests referencing the Herts Green and Blue Infrastructure Strategy which is currently being prepared by the Spatial Planning team. The following updates are recommended in accordance to the suggested referencing.</p> <p><u>2) Priorities for Green and Blue Infrastructure focus on conserving and enhancing the following key assets and the linkages between them: ... d) the District's Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, key biodiversity habitats, species and areas identified in the Hertfordshire Biodiversity Action Plan and Local Nature Recovery Strategy and heritage assets and landscape character within areas of Green Infrastructure. ... 7). The</u></p>	<ul style="list-style-type: none"> <li>Supports policy and has proposed some additional wording to address concerns regarding insufficient land allocation to ensure that the infrastructure is managed and maintained (paragraph 1)</li> <li>HCC suggests referencing the Herts Green and Blue Infrastructure Strategy. HCC also recommends suggested wording in the supporting text (paragraph 2 d) and supporting text.</li> <li>Paragraph 10.0 -Amend definition of Green Infrastructure (GI).</li> <li>There is however concern with regard to the lack of reference to any evidence to underpin the strategic planning and delivery of GI within the district and its wider context, in line with NPPF paragraph 25, which confirms that authorities should collaborate to identify the relevant strategic matters (such as GI) which they need to address in their plans.</li> <li>There is no reference to a district level GI strategy within the policy or listed within the local plan evidence base. It is suggested that a district level strategy is critical to identify opportunities for the enhancement and creation of GI, especially where it can be given planning weight and endorsed as a material consideration in the planning process, and it can be embedded in the</li> </ul>	<ul style="list-style-type: none"> <li>Agreed amendments to wording.</li> <li>TRDC is undertaking evidence updates to inform the Regulation 19 Local Plan.</li> </ul>	<p>Suggested wording within paragraph 1)  <u>The Council will seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces.</u>  <u>a. Where land is provided or identified for Green and Blue Infrastructure purposes as part of a development proposal, applicants will be required to provide appropriate land management and maintenance plans.</u>  <u>b. Stewardship plans and funding arrangements will also be required on major developments or ecologically sensitive sites."</u></p> <ul style="list-style-type: none"> <li>suggested wording within paragraph 2) d)</li> </ul> <p><u>d) the District's Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, key biodiversity habitats, species and areas identified in the Hertfordshire</u></p>

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	<p><u>approach to Green Infrastructure will be consistent with the revised Hertfordshire Green Infrastructure Strategy.</u></p> <p>HCC would also recommend including the following in the supporting text: <u>“Green and Blue infrastructure enables natural flood control, and also to stress that enhancement of biodiversity requires land management and connectivity between sites. We have not seen reference to the importance of the rural economy and farming / grazing practices to maintain priority habitats and would like to see this mentioned in the commentary. It links to Biodiversity Net Gain as this requires a 30 year management strategy.”</u></p> <p>The Landscape Institute<sup>3</sup> confirms that GI functions are the roles that assets play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystem services.’ It is important to acknowledge functions that deliver a range of health and wellbeing benefits. With regard to paragraph 2), the priorities are supported in principle; however, they are very high level and there may be areas between them that are equally important, for example in supporting the function of natural systems. This could be evidenced within a district level GI strategy as discussed above. It is suggested that the wording within paragraph 2) d) is amended as follows:</p> <p><u>d) the District’s Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, key biodiversity habitats, species and areas identified in the Hertfordshire Biodiversity Action Plan<sup>15</sup>, Local Nature Recovery Strategies and heritage assets and landscape character within areas of Green Infrastructure.</u></p> <p>With regard to paragraph 3), it should be noted that not all GI is, or should be, accessible. Avoiding conflict between people and sensitive habits and wildlife, is critical in the planning and management of GI, and there needs to be balance of provision for to meet the needs of people or wildlife, or both. It is suggested that there could be a greater distinction between the provision of strategic GI networks and public open space and recreation networks – that should complement each other.</p> <p>At a site (planning application) level, it is understood that open space requirements are informed by objectively assessed needs. In relation to GI, it is suggested that agreed GI principles should be embedded within design guides and codes/development briefs or similar mechanisms. Given the progress of the Environment Bill, we advise it should now refer to Local Nature Recovery Strategies which will be a requirement of the Environment Act. The policy should ideally refer to the National Design Guide and a requirement for the preparation and agreement of Design Codes for major developments which are in or affect designated or sensitive rural and urban fringe landscapes.</p> <p>Appropriate technologies will be used to minimise the energy usage required and carbon generated. This may include the energy source, bulb, daylight or movement sensors, or timers. The definition in the NPPF of Green Infrastructure (GI) has been updated in July 2021 and the text within paragraph 10.0 should be amended as follows:</p>	<p>infrastructure delivery Plan, in line with NPPF paragraph 34, which states that plans should set out contributions expected from development to deliver green infrastructure.</p> <ul style="list-style-type: none"> <li>• Supports the provision of sustainable design and the requirement for development proposals to take opportunities to reduce waste within paragraph 17.</li> </ul>		<p><u>Biodiversity Action Plan<sup>15</sup>, Local Nature Recovery Strategies and heritage assets and landscape character within areas of Green Infrastructure.</u></p> <p>Supporting text: <u>“Green and Blue infrastructure enables natural flood control, and also to stress that enhancement of biodiversity requires land management and connectivity between sites. We have not seen reference to the importance of the rural economy and farming / grazing practices to maintain priority habitats and would like to see this mentioned in the commentary. It links to Biodiversity Net Gain as this requires a 30 year management strategy.”</u></p> <p><b>Need to undertake a GI Study.</b></p> <p>Paragraph 10.0 -Amend definition of Green Infrastructure (GI).</p> <p><u>Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.”</u></p> <p>New Paragraphs 10.1 amended to elaborate on green infrastructure in three rivers.</p> <p>New Paragraph 10.2 reference has been made to the importance of the rural economy and farming / grazing practices to maintain priority habitats,</p>
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		<p><u>“Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.”</u> The overall policy intention to conserve and enhance green and blue infrastructure (GI), is fully supported.</p> <p>Paragraph 10.6 It is considered that the wording in this paragraph should be amended as follows: <u>“Public Rights of Way of provide valuable footpath, cycle and bridleway routes within the urban area and out into the countryside. During the 2020 /21 coronavirus pandemic the value of Rights of Way became even more important have been prevalent, providing an extensive network for to access and recreation within the countryside...”</u></p> <p>There is however concern with regard to the lack of reference to any evidence to underpin the strategic planning and delivery of GI within the district and its wider context, in line with NPPF paragraph 25, which confirms that authorities should collaborate to identify the relevant strategic matters (such as GI) which they need to address in their plans. The ‘Hertfordshire Strategic Green Infrastructure Plan (Incorporating Green Arc area), Land Use Consultants, March 2011’ provides an overview of the proposed GI network at a County level. This document is currently under review with renewed emphasis on strategy, delivery an implementation, commissioned by Hertfordshire Infrastructure Planning Partnership (HIPP), and provides the framework within which more local strategies should sit. There is no reference to a district level GI strategy within the policy or listed within the local plan evidence base. It is suggested that a district level strategy is critical to identify opportunities for the enhancement and creation of GI, especially where it can be given planning weight and endorsed as a material consideration in the planning process, and it can be embedded in the infrastructure delivery Plan, in line with NPPF paragraph 34, which states that plans should set out contributions expected from development to deliver green infrastructure.</p> <p>A strategy would provide planning officers with an important tool and robust justification for the provision of GI in negotiations with developers. It can also inform masterplans, design guides and codes, under the recent and emerging planning reforms. The county council supports the provision of sustainable design and the requirement for development proposals to take opportunities to reduce waste within paragraph 17.</p>			<p>which links to Biodiversity Net Gain.</p> <p>Paragraph 10.6 It is considered that the wording in this paragraph should be amended as follows: <u>“Public Rights of Way of provide valuable footpath, cycle and bridleway routes within the urban area and out into the countryside. During the 2020 /21 coronavirus pandemic the value of Rights of Way became even more important have been prevalent, providing an extensive network for to access and recreation within the countryside...”</u></p>
SC_00 028_Ca nal & River Trust	Canal & River Trust	<p>The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The importance of canals as green infrastructure is well recognised, and Paragraph 175 of the National Planning Policy Framework is clear that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure should be undertaken. It is therefore encouraging to note that the canal corridor is acknowledged as a key green and blue infrastructure asset within the Local Plan area and overall, the policies are positive and</p>	<ul style="list-style-type: none"> <li>• Requirement for surveys to be conducted along the GU to identify water vole and other important wildlife habitat could be included as a priority.</li> <li>• The Council should consider the development and enhancement of floating habitat and other habitat enhancement projects</li> </ul>	Noted	<p>Policy to be amended to require developers to undertake surveys for wildlife habitat in regards to development within the vicinity of the GU canal.</p>

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			supportive. The requirement for surveys to be conducted along the GU to identify water vole and other important wildlife habitat could be included as a priority. In addition, the Council should consider the development and enhancement of floating habitat and other habitat enhancement projects.			
P1_000_02	Yes	Correct		<ul style="list-style-type: none"> <li>Noted</li> </ul>	Noted	No action
P1_000_05	No	Should this question be about Green & Blue Infrastructure rather than Waste Management and Recycling which has been covered before? That said, I agree with the proposals on Green & Blue Infrastructure		<ul style="list-style-type: none"> <li>Should this question be about Green &amp; Blue Infrastructure rather than Waste Management and Recycling which has been covered before?</li> </ul>	Noted	No action
P1_000_06	Yes	This area verges on the countryside of Hertfordshire, we are a suburban area which benefits from both nearby urban districts and Green Belt. Therefore, we must protect rivers, the canal, local wildlife areas and areas of outstanding beauty. That includes the existing Rights of way and footpaths. We owe it to future generations to protect it for them. Once more I point to the recent lock down during the pandemic when we have made even more use of the countryside on our doorsteps. Daily walks in this beautiful area must have assisted both physical and mental health and in such is an added amenity.		<ul style="list-style-type: none"> <li>Protect rivers, canals, wildlife and the AONB, including rights of way;</li> <li>Made even more use of the countryside since the pandemic.</li> </ul>	Noted	No action
P1_000_14	Yes	Makes logical sense		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000_17	No	Mandatory - use the word "MUST"		<ul style="list-style-type: none"> <li>Make mandatory/ use the word 'must'</li> </ul>	Noted	No action
P1_000_19	Yes	Agree with approach		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000_20	Yes	Agree with approach		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000_21	Yes	The areas outlined above have been so neglected and need protection and infrastructure to prevent floods		<ul style="list-style-type: none"> <li>Areas outlined in the policy have been so neglected and need protection and infrastructure to prevent floods.</li> </ul>	Noted	No action
P1_000_23	Yes	Extension of the Colne Valley park to boundary with Watford Borough to ensure consistent protection of upstream river quality and associated wildlife.		<ul style="list-style-type: none"> <li>Extend Colne Valley Park to boundary with Watford to ensure consistent protection of upstream river quality</li> </ul>	Noted	No action
P1_000_24	Yes	Green space is essential for physical and mental wellbeing.		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000_25	No	Won't improve connectivity		<ul style="list-style-type: none"> <li>Won't improve connectivity.</li> </ul>	Noted	No action
P1_000_26	Yes	Clear Policy		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000_27	Not Specified	This should include back and front gardens, street verges, roundabout, central reservations, etc. as part of green infrastructure.		<ul style="list-style-type: none"> <li>Should include back and front gardens, street verges roundabouts, central reservations etc as part of green infrastructure.</li> </ul>	Noted	No action
P1_000_28	Yes	AS LONG AS THIS MEANS THERE ARE NO 'SPECIAL CIRCUMSTANCES' that allow building on Numbers Farm.		<ul style="list-style-type: none"> <li>As long as this means there are no special circumstances to build on Numbers Farm</li> </ul>	Noted – See Part 2 responses in regards to sites.	No action
P1_000_32	Yes	We are fortunate to have so many important sites in our local Green Infrastructure and should take all measures possible to preserve and develop them.		<ul style="list-style-type: none"> <li>Agree with approach. Fortunate to have so many important Green Infrastructure sites.</li> </ul>	Noted	No action
P1_000_33	Yes	It protects Green Spaces		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000_34	Yes	No Comment		<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	No action

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P1_000 38	Yes	Developments must not impact on our local rivers and natural environment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 40	No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> <li>Do not develop Green Belt Land</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	No action
P1_000 41	Yes	Developers must contribute to maintaining, improving, creating green and blue infrastructure for residents to enjoy.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 43	No	Regular assessment & addition to locally important buildings list	<ul style="list-style-type: none"> <li>Regular assessment and addition to locally important buildings list.</li> </ul>	Noted	No action
P1_000 45	Yes	Point 1 should be given significant weight.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 46	Yes	TRDC is top of the scale with waste management and recycling	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 47	No	The policy sounds good but is too weak as it would not preserve the woodlands and wildlife habitats that are threatened by the Draft Local Plan.	<ul style="list-style-type: none"> <li>Policy needs to be strengthened to strengthen woodland and wildlife habitats from development.</li> </ul>	Noted	No action
P1_000 48	Yes	Question above relates to a different section?	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 49	Yes	Agree with approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 53	Yes	Yes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 54	Yes	The environment needs protecting	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 55	Yes	Preserving natural habitats etc important	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action

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P1_000 56	Yes	THIS QUESTION HEADING IS INCORRECT - SHOULD BE BLUE / GREEN INFRASTRUCTURE NETWORKS. Otherwise OK	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 63	Yes	Agree	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 64	Yes	Agree with approach	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 66	Yes	Agree	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 68	No	You talk the talk but fail to walk the walk! You cannot state that you wish to protect the Green Belt and then seek to concrete over it in the next breath! We don't really have a "Green Belt" as such - the idea was good - like Central Park in New York, a completely sacrosanct area free of development. In this country, most councils and developers conspire to subvert the good intentions of the few and constantly chew away at anything green. Building the proposed 1800 new houses on farmland around Maple Cross cannot be described as anything but an environmental disaster and completely fails article 6 = "Development will not compromise the integrity of the Green Infrastructure network, by causing fragmentation, damage to, or isolation of Green Infrastructure assets including natural habitats and species".	<ul style="list-style-type: none"> <li>• Cannot state that you want to protect the Green Belt then concrete over it;</li> <li>• Do not really have a Green Belt, developers are now chipping away at it.</li> <li>• Objects to proposed development at maple cross</li> </ul>	Noted	No action
P1_000 69	No	Do not agree with approach but no comments made.	<ul style="list-style-type: none"> <li>• Do not agree with approach but no comments made.</li> </ul>	Noted	No action
P1_000 74	Yes	Agree with approach	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 76	No	Not enough green areas have been cited as a priority for protection. Other areas should also be added – Philipshill Wood - Carpenters Wood -Bottom Hill Wood And in all case surrounding fields too. Look at housing policy to reduce housing inequality rather than building on the greenbelt what will probably be unaffordable homes to most average income families anyway.	<ul style="list-style-type: none"> <li>• Not enough areas sited for protection;</li> <li>• Other areas such as Philipshill Wood, Carpenters Wood, Bottom Hill Wood and surrounding fields should be added.</li> <li>• Look at housing policy to reduce housing inequality rather than building on the greenbelt</li> </ul>	Noted	No action
P1_000 77	Yes	Agree with approach	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 78	Yes	Good proposals but changes should bring improvements as in wider segregated pedestrian and cycling paths.	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 80	Yes	Only if you stick to your policy. Building of new houses in green belt / open land is not protecting our district	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 83		You need to specify minimum buffer widths to protect your blue and green infrastructure network. Without buffers they are vulnerable to erosion and disturbance, which results in an effective net loss of value. These buffers must be explicitly stated in the policy. Change to: 6) Development will not compromise the integrity of the Green Infrastructure network, by causing fragmentation, damage to, or isolation of Green Infrastructure assets including natural habitats and species. All watercourses and priority habitats must be buffered by a minimum of 10m of complimentary habitat to ensure their continued ecological functionality.	<ul style="list-style-type: none"> <li>• Specify blue and green infrastructure networks</li> <li>• Change policy should 6) Development will not compromise the integrity of the Green Infrastructure network, by causing fragmentation, damage to, or isolation of Green Infrastructure assets including natural habitats and species. All watercourses and priority habitats must be buffered by a minimum of 10m of complimentary habitat to ensure their continued ecological functionality.</li> </ul>	Noted	No action
P1_000 84	Yes	For safety of residents living in Chorleywood	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_000 88	Yes	Sensible	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action

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P1_000 89	Yes	We need to protect the environment and habitats that live within the green belt land and so wildlife and animals such as farmers' fields, cows etc locally (up Green Street) is protected from development so they can breed and continue and enhance their species naturally in non-polluted air and environment.	<ul style="list-style-type: none"> <li>Need to protect environment and habitats that live within the Green Belt and wildlife and animals</li> </ul>	Noted	No action
P1_000 91	Yes	Agree with approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 96	Yes	Seems sensible	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 97	Yes	Green belt and open spaces should be protected.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_000 98	Yes	How can you evidence this though? How can the homes you want to build be consistent with this?	<ul style="list-style-type: none"> <li>Do you have evidence for this? How can homes be compliant with this?</li> </ul>	Noted	No action
P1_000 99	Yes	This is not consistent with building thousands of homes.	<ul style="list-style-type: none"> <li>Not consistent with building thousands of homes.</li> </ul>	Noted	No action
P1_001 02	Yes	All green and blue infrastructure must, at the very least, be protected and preferably enhanced.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001 06	No	Strain on everything in the area.	<ul style="list-style-type: none"> <li>Strain on everything in area</li> </ul>	Noted	No action
P1_001 07	No	Not destroying greenbelt so that green spaces naturally connect would be better. It would help wildlife and diversity too!	<ul style="list-style-type: none"> <li>Not destroying Green Belt so that green spaces naturally connect would be better.</li> </ul>	Noted	No action
P1_001 08	Yes	standard procedure	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001 10	No	<p>No. The phrase 'Green Infrastructure' was originally proposed to describe the network of retained and new green space incorporated into new development. The definition has shifted to include all unbuilt-up green space, urban and rural. Recently 'Blue' has been added to incorporate water-based space.</p> <p>It is disturbing that the wider countryside, including protected landscapes, is not specified as green infrastructure in the list in para 10.0. There is no specific mention of hedgerows in the para 10.0 despite the important role they play as wildlife habitats, landscape features and carbon sinks, with many being significant historic assets as well.</p> <p>There is also no mention of roadside verges, which if carefully managed are an important biodiversity resource. Throughout the document the only four references to agriculture are connected to agricultural buildings. This is despite the fact that 76% of Three Rivers District is Green Belt, and the 546 hectares of the Chilterns Area of Outstanding Natural Beauty (AONB) are described as sparsely populated. The way in which land is managed is a significant element of climate change mitigation and adaptation For PPO19, key assets should include agricultural land and, separately, soils. Well-managed soil can be a significant carbon sink and conversely poorly-managed soil can be a major contributor to loss of carbon into the atmosphere. PPO 19 also lacks any indication of targets for additional assets, or any spatial planning intentions. The omissions noted above are repeated in paras 10.3 and 10.4. It is largely impossible for development on the scale proposed, especially in the Green Belt, to achieve the ambition in PPO19 para 6, although this is a laudable aim in the attempt to stop further loss of biodiversity. The same applies to the ambition in para 10.10, given that significant losses of Green Belt are proposed which are generally regarded as 'landscape'.</p>	<ul style="list-style-type: none"> <li>Concerns that wider countryside, including protected landscapes, not specified as Green Infrastructure in para 10.0;</li> <li>no mention of roadside verges, which if carefully managed are an important biodiversity resource;</li> <li>Key assets should include agricultural land;</li> <li>Clear and distinct policies are required for separate elements of green and blue infrastructure, especially the protected landscape of the Chilterns AONB;</li> <li>There should be much greater emphasis in this chapter on the role of natural habitats and other undeveloped land including farmland to contribute to achieving net zero carbon targets;</li> <li>The general assumption that species and habitats can be successfully relocated and recreated is not supportable in many cases.</li> <li>The role of agricultural land should be given much greater prominence, due to its existing value,</li> <li>There should be a District-wide spatial strategy for green and blue infrastructure enhancement, such as that being carried out by other LPAs (for example, Lancaster City Council).</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action



## Appendix 8 - REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Green and Blue Infrastructure

			<p>In the light of the significance of countryside issues, we would make the following further key recommendations with regard to Green and Blue Infrastructure:</p> <ul style="list-style-type: none"> <li>□ Clear and distinct policies are required for separate elements of green and blue infrastructure, especially the protected landscape of the Chilterns AONB, existing designated wildlife sites, habitats supporting protected and priority species, other existing areas of biodiversity value, and new sites. The policies set out in para 3 of PPO21 in particular present an open door for continuing loss of biodiversity across the District.</li> <li>□ There should be much greater emphasis in this chapter on the role of natural habitats and other undeveloped land including farmland to contribute to achieving net zero carbon targets and mitigating the effects of climate change, including reducing the impacts of extreme weather events.</li> <li>□ The general assumption that species and habitats can be successfully relocated and recreated is not supportable in many cases. A key element of the biodiversity value of many sites is the length of time that they have existed on a site and may reflect a long period of stability and lack of disturbance to soils and other physical characteristics.</li> <li>□ The role of agricultural land should be given much greater prominence, due to its existing value, and further potential to enhance landscapes, mitigate climate change, and support health and well-being.</li> </ul> <p>There should be a District-wide spatial strategy for green and blue infrastructure enhancement, such as that being carried out by other LPAs (for example, Lancaster City Council). This would enable the potential of the District to support biodiversity recovery to be better realised, and allocate sites for biodiversity net gain required to mitigate biodiversity losses resulting from new development. It could also set out how the existing network of informal recreational facilities, especially public rights of way, can be expanded where needed, in conjunction with new biodiversity provision.</p>			
P1_001_12	Yes	Agree		<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_001_13	Yes	No Reason		<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_001_14	Yes	Concur		<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_001_16	Yes	I agree with the policy as stated.		<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_001_17	No	Keep green, green		<ul style="list-style-type: none"> <li>• Keep it green</li> </ul>	Noted	No action
P1_001_19	No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.		<ul style="list-style-type: none"> <li>• Land is sanctuary for wildlife.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action
P1_001_20	Yes	The question is wrong. It should refer to the Preferred Policy Option for Green and Blue Infrastructure. The Buffer of at least 20m around rights of way must be included in all cases and not ignored when the sites are adjoining other local authorities i.e. Watford and Hertmere, and links to green infrastructure in adjoining authorities must be upheld.		<ul style="list-style-type: none"> <li>• Question is wrong and should refer to Preferred Policy Option for Green and Blue Infrastructure.</li> <li>• Buffer of 20m around rights of way.</li> </ul>	Noted	No action
P1_001_23	Yes	Excellent		<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action

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P1_001_27	Yes	Agree with approach	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	No action
P1_001_30	No	Yes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001_31	No	Somewhat at odds with the 'redraw Green Belt map' but otherwise looking hopeful. More emphasis on wildlife corridors in general would be good - not just in Three Rivers but linking with neighbouring authorities, please.	<ul style="list-style-type: none"> <li>More emphasis on wildlife corridors would be good;</li> <li>At odds with 'redraw Green Belt' map</li> </ul>	Noted	No action
P1_001_32	Yes	Balanced approach is best, Collaborate with neighbouring councils.	<ul style="list-style-type: none"> <li>Agree with approach</li> <li>collaborate with neighbouring councils.</li> </ul>	Noted	No action
P1_001_33	Not Stat ed	<p>The green and blue characteristics of the District require further enhancement with specific retention of rights of way. It is not sufficient to imply a ranking of these between those that connect known green/blue corridors and 'others'. An appropriate buffer, such as 20metres each side should be spelt out as a minimum to achieve and supported by landscape design guides to ensure green space. If you can guide on density you can guide on landscape. In addition there are Ancient Woodland in the District located outside of the AONB. Whilst Natural England recommend a 'no development' buffer around these. It would be logical to both make this compulsory and extent it - to align with the footpath argument.</p> <p>It would also make sense to look at Ancient Woodland within the context of supporting and adjoining areas not so designated. This would promote sustainable Ancient Woodland and support its value, rather than place it under pressure.</p>	<ul style="list-style-type: none"> <li>Green and Blue Infrastructure requires further enhancement with specific retention of public rights of way;</li> <li>Appropriate buffer of 20m should be a minimum;</li> <li>Ancient Woodland outside AONB should have a no development buffer around;</li> <li>Look at Ancient Woodland in context of supporting and adjoining areas not so designated. Would promote sustainable Ancient Woodland and support its value, rather than place under pressure</li> </ul>	Noted	No action
P1_001_35	No	You have already asked this question, what is going on	<ul style="list-style-type: none"> <li>Already asked this question and causing confusion.</li> </ul>	Noted	No action
P1_001_37	Yes	Yes I Agree	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001_40	Yes	Agree with points	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001_42	No	Do not agree with approach but no reason given	<ul style="list-style-type: none"> <li>Do not agree with approach but no reason given</li> </ul>	Noted	No action
P1_001_44	No	If we want more housing a compromise is needed. Use greenbelt or build higher. The visual impact of high rise must be balanced with loss of vital green belt land	<ul style="list-style-type: none"> <li>Build higher or use green belt if you want more housing.</li> </ul>	Noted	No action
P1_001_47	Yes	Seems fine	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001_48	Yes	Creating a healthy balanced environment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001_49	No	<p>I agree with the Chorleywood Residents Association position: Whilst there is much in this policy to be Commended some key changes are required to make it truly sustainable: The policy lists a number of important sites as key assets. We recommend that this list should include both Chorleywood Common and Chorleywood House Estate, as both cover a significant amount of land.</p> <p>Whilst the requirement to improve connectivity through Green and Blue corridors is positive, the limits on this policy to apply to "key assets" only should be removed. It is vital that links between all Green sites and Blue sites are properly maintained, because any Green site that becomes cut off from the wider Green Network will then suffer a reduction in the sustainability of flora and fauna and its biodiversity. It is also vital that the corridors are of sufficient width and nature to enable wildlife to confidently move through them. The</p>	<ul style="list-style-type: none"> <li>Policy lists assets, should include Chorleywood Common and Chorleywood House Estate;</li> <li>Links between Green sites and Blue sites are properly maintained; any Green site that becomes cut off from the wider Green Network will then suffer a reduction in the sustainability of flora and fauna and its biodiversity;</li> <li>Buffer around footpath should be 30m or 40m buffer</li> </ul>	Noted. Green belt is a policy designation with specific purposes for including land within it. Green infrastructure is a broad term to define a "network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities". The two are not the same.	No action

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			20m buffer around Rights of Way is an improvement in the Local Plan but this buffer is not large enough when considering rights of way that currently go through open green spaces. 20m equates to 10m or 30 foot each side of the right of way, which is little more than the shadow cast by a house. This will still leave the users and wildlife on the footpath feeling relatively enclosed. We therefore recommend that this buffer be increased where the rights of way currently go through open green spaces, to either 30m or 40m.			
P1_001 50	No	No, I do not agree with the approach. The phrase “Green Infrastructure” was originally proposed to describe the network of retained and new green space incorporated into new development. The definition has shifted to include all unbuilt-up green space, urban and rural. Recently “Blue” has been added to incorporate water-based space. It is very concerning that the wider countryside, including protected landscapes, is not specified as green infrastructure in the list in para 10.0. There is no specific mention of hedgerows despite the important role they play as wildlife habitats, landscape features and carbon sinks, with many being significant historic assets as well. There is also no mention of roadside verges, which if carefully managed are an important biodiversity resource. Throughout the document the only four references to agriculture are connected to agricultural buildings. This is despite the fact that 76% of Three Rivers District is Green Belt, and the 546 hectares of the Chilterns Area of Outstanding Natural Beauty (AONB) are described as sparsely populated. The way in which land is managed is a significant element of climate change mitigation and adaptation. It is impossible for development on the scale proposed in the plan, especially in the Green Belt, to achieve the ambition in PPO19 para 6, although this is a welcome aim in the attempt to stop further loss of biodiversity. The same applies to the ambition in para 10.10, given that significant losses of Green Belt are proposed which are generally regarded as “landscape”. There should be a District-wide spatial strategy for green and blue infrastructure enhancement, such as that being carried out by other LPAs (for example, Lancaster City Council). This would enable the potential of the District to support biodiversity recovery to be better realised, and allocate sites for biodiversity net gain required to mitigate biodiversity losses resulting from new development. It could also set out how the existing network of informal recreational facilities, especially public rights of way, can be expanded where needed, in conjunction with new biodiversity provision.	<ul style="list-style-type: none"> <li>Throughout the document the only four references to agriculture are connected to agricultural buildings;</li> <li>It is very concerning that the wider countryside, including protected landscapes, is not specified as green infrastructure in the list in para 10.0;</li> <li>There should be a District-wide spatial strategy for green and blue infrastructure enhancement, such as that being carried out by other LPAs (for example, Lancaster City Council).</li> </ul>	Noted. Policy has been amended in accordance with HCC representation	No action	
P1_001 51	Yes	Because the character of this area is enhanced by green areas and water (this is the answer to the question that should be here).	<ul style="list-style-type: none"> <li>Agree with approach as character of area is enhanced by green areas and water.</li> </ul>	Noted	No action	
P1_001 54	Not Stat ed	The Associations generally support this Preferred Policy Option and the proposals for protecting and enhancing existing green and blue infrastructure networks. It is critically important, as indicated in the supporting justification, to create new infrastructure wherever possible, and to improve the potential for public access and recreational provision. The policies are generally compliant with the NPPF 2021 and the Hertfordshire Biodiversity Plan. The Associations do have some detailed comments which are set out below. 35. Under sub-paragraph (2), it is suggested that the Landscape Character Areas could be added to the list. The identification of the blue water assets is welcomed, but it is suggested that some	<ul style="list-style-type: none"> <li>The Landscape Character Areas could be added to the list;</li> <li>Critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence;</li> <li>Proposed buffer around footpath should be 30m to 40m.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation	No action	

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			<p>reference must be made to the importance of protecting the District's rare chalk steams, which are a global priority habitat. Cross-reference should be made to Preferred Policy Options 15 Flood Risk and Water Resources and 21 Biodiversity.</p> <p>36. Whilst the requirement, in sub-paragraph (4), to improve connectivity between Green and Blue corridors is positive, the limits to apply to "key assets" should be removed, especially as there seems to be no definition of the term. It is vital that it apply to all green (and blue) sites, because any site that becomes cut off from the wider network will automatically suffer from a negative impact on its flora and fauna and a reduction in its biodiversity. It is also critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence.</p> <p>37. In sub-paragraph (5), the proposed 20m buffer around Rights of Way is a real improvement, but the Associations would query whether this is large enough when considering Rights of Way that pass through open green spaces. In those locations, it is recommended that the buffer be increased, to either 30m or 40m.</p>			
P1_001_55	Yes	The header of this says waste management but I agree that the protection of green and blue infrastructure is very important	<ul style="list-style-type: none"> <li>Agree with approach. Header says waste management.</li> </ul>	Noted	Will review the header from the Local Plan.	
P1_001_57	No	The wider countryside, including protected landscapes, is not mentioned as green infrastructure. There is no specific mention of hedgerows, even though they play an important role as wildlife habitats, as well as being significant historic assets and also taking into consideration that the UK has already lost a large percentage of them since WW2, thus impacting on wildlife. There should be a strategy for green and blue infrastructure enhancement. This would enable the district to support biodiversity recovery. It could also set how other recreational facilities such as public rights of way can be expanded if needed.	<ul style="list-style-type: none"> <li>Wider countryside, protected landscapes, not mentioned as green infrastructure;</li> <li>Should be a strategy for green and blue infrastructure enhancement;</li> <li>How recreational facilities such as rights of way can be expanded if needed.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action	
P1_001_62	Yes	This is vital work and will hopefully protect our dwindling wildlife and rivers	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action	
P1_001_66	Yes	Agree with approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action	
P1_001_67	Not Stated	Why is the Colne Valley Park not included on this list? This is an enormous oversight. And if TRDC states that it will protect nature reserves – why is it including development sites on this plan that will result in the destruction of the Maple Lodge reserve?	<ul style="list-style-type: none"> <li>Colne Valley needs to be included</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action	
P1_001_69	Yes	We need further blue environments and enhancing of our current blue environments (reducing contamination)	<ul style="list-style-type: none"> <li>Agree with approach. Need further and enhanced blue environments by reducing contamination</li> </ul>	Noted	No action	
P1_001_70	Yes	No Comment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action	
P1_001_72	Yes	Protect all parks and woodlands at all costs	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action	
P1_001_74	Yes	I agree with the approach in general, but: The key assets listed in Part 2 should include agricultural land and soils. These assets can be a significant carbon sink and repository of biodiversity. It would be beneficial to place much greater emphasis on the role of natural habitats and other undeveloped land like farmland in climate mitigation (contributing to achieving net zero carbon targets) and mitigating the effects of climate change, including reducing the impacts of extreme weather events. The assumption that species and habitats can be successfully relocated and recreated is not always true. A key element of the biodiversity value of many sites is	<ul style="list-style-type: none"> <li>The key assets listed in Part 2 should include agricultural land and soils;</li> <li>Key element of biodiversity value of many sites is length of time they have existed on site as stable/ undisturbed "havens" for wild animals and plants;</li> <li>Cannot assume that plants and animals will rapidly and easily adjust to those new Blue and Green infrastructure</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action	

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			the length of time that they have existed on a site as stable and undisturbed "havens" for wild animals and plants. So although compensating for habitat/biodiversity loss is vital, it cannot be assumed that plants and animals will rapidly and easily find and adjust to those new Blue and Green infrastructure locations, particularly if little has been done to "rewind" the sites.	locations, particularly if little has been done to "rewind" the sites.		
P1_001 81	Not Specified		The Society strongly supports this preferred Policy Option. However, this section could be further expanded to include a reference to addressing the current biodiversity crisis and the Government's focus on nature recovery up to 2030 and beyond. We would like to see the Council strongly commit to nature recovery as well as making reference to delivering Biodiversity Net Gain through new development. Whilst the Government is suggesting a 10% target, we would like to see a 20% target to recognise the intense development pressure in Three Rivers and therefore the increasing pressure on nature and the need for Local Nature Recovery Networks. The Society has developed its own 'Manifesto for Chilterns Wildlife' to focus attention on the urgent need for nature recovery in the area. <a href="https://chilternsociety.org.uk/chiltern-manifesto/">https://chilternsociety.org.uk/chiltern-manifesto/</a> This should be read in conjunction with the Chilterns AONB Management Plan.	<ul style="list-style-type: none"> <li>Like to see the Council strongly commit to nature recovery as well as making reference to delivering Biodiversity Net Gain through new development. Whilst the Government is suggesting a 10% target, we would like to see a 20% target to recognise the intense development pressure in Three Rivers.</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action
P1_001 83	Yes		Agree with approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001 84	No		There should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity.	<ul style="list-style-type: none"> <li>Specific reference to maintaining smaller scale features, such as road verges, street trees, front and back gardens etc to support biodiversity.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action
P1_001 86	No		Do not agree with approach	<ul style="list-style-type: none"> <li>Do not agree with approach</li> </ul>	Noted	No action
P1_001 87	No		There should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity.	<ul style="list-style-type: none"> <li>Specific reference to maintaining smaller scale features, such as road verges, street trees, front and back gardens etc to support biodiversity.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action
P1_001 90	Yes		Sensible	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_001 92	No		I presume the website has malfunctioned and the question should actually read: Do you think the Preferred Policy Option for Green and Blue Infrastructure is the right approach? If not please identify how the option could be changed. My response to this is as follows: - The policy lists a number of important sites as "key assets". This list should include both Chorleywood Common and Chorleywood House Estate, as both cover a significant amount of land. - Whilst the requirement to improve connectivity through Green and Blue corridors is positive, the limits on this policy to apply to "key assets" only should be removed. It is vital that links between all Green sites and Blue sites are properly maintained, because any Green site that becomes cut off from the wider green Network will then suffer a reduction in the sustainability of flora and fauna and its biodiversity. It is also vital that the corridors are of sufficient width and nature to enable wildlife to confidently move through them. - The 20m buffer around Rights of Way is an improvement in the Local Plan but this buffer is woefully inadequate when considering rights of way that currently go through open green spaces. 20m equates to	<ul style="list-style-type: none"> <li>The Landscape Character Areas could be added to the list;</li> <li>Critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence;</li> <li>Proposed buffer around footpath should be 30m to 40m.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action

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			10m each side of the right of way, which is little more than the shadow cast by a house. This will leave the users and wildlife on the footpath feeling enclosed and such close proximity of human activity is likely to impact on wildlife usage. This buffer should be significantly increased where the rights of way currently go through open green spaces, to at least 100 m on either side in order to maintain open views where they currently exist, to minimize impact of human activity on wildlife and to maintain the 'wild' character of the site.			
P1_001_93	Yes	<p><b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming Environment Bill will make this mandatory for all new developments, and that development will “not be at the expense of vital biodiversity”. It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net gain requirement, I urge TRDC to take the lead on this issue and do the same.</p> <p>In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.</p>	<ul style="list-style-type: none"> <li>• Policy needs to be strengthened;</li> <li>• Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill;</li> <li>• Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> <li>• Swift Bricks or Boxes should be built in all new developments;</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action	
P1_001_94	Yes	<p><b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming Environment Bill will make this mandatory for all new developments, and that development will “not be at the expense of vital biodiversity”. It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net gain requirement, I urge TRDC to take the lead on this issue and do the same.</p> <p>In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.</p>	<ul style="list-style-type: none"> <li>• Policy needs to be strengthened;</li> <li>• Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill;</li> <li>• Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> <li>• Swift Bricks or Boxes should be built in all new developments;</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action	
P1_001_95	Yes	<p><b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming Environment Bill will make this mandatory for all new developments, and that development will “not be at the expense of vital biodiversity”. It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net</p>	<ul style="list-style-type: none"> <li>• Policy needs to be strengthened;</li> <li>• Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill;</li> <li>• Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> <li>• Swift Bricks or Boxes should be built in all new developments;</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action	

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			gain requirement, I urge TRDC to take the lead on this issue and do the same. In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.			
P1_001_98	Not Specified		We need to protect our green and blue infrastructure.	<ul style="list-style-type: none"> <li>Need to protect Green and Blue Infrastructure areas.</li> </ul>	Noted	No action
P1_002_01	Yes		Right to improve this but biodiversity should be protected in the process	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_002_03	Not specified		Excessive development will provide more houses. Many of these will be snapped up by rich investors who will either do bulk, off plan deals with volume builders or will simply outbid first time, local buyers. The houses will then be let at exorbitant rents to our young people who will risk being locked out of home ownership forever as they will be unable to save for a deposit. The houses which are built will add hugely to damage to the environment and to pressure on infrastructure. This in turn will increase damage to our green areas and services - such as we have seen at the River Chess. In Sarratt the watercress beds have become polluted and have closed. In Chesham the local river is often completely dry because of over-extraction by water companies. Other rivers have been damaged by flooding including untreated sewage. All threatened to worsen by over development.	<ul style="list-style-type: none"> <li>The houses which are built will add hugely to damage to the environment and to pressure on infrastructure;</li> <li>Chesham the local river is often completely dry because of over-extraction by water companies.</li> </ul>	Noted	No action
P1_002_06	Yes		Agree with approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_002_07	Yes		<b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming Environment Bill will make this mandatory for all new developments, and that development will “not be at the expense of vital biodiversity”. It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net gain requirement, I urge TRDC to take the lead on this issue and do the same. In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.	<ul style="list-style-type: none"> <li>Policy needs to be strengthened;</li> <li>Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill;</li> <li>Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> <li>Swift Bricks or Boxes should be built in all new developments;</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action
P1_002_08	Yes		<b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming Environment Bill will make this mandatory for all new developments, and that development will “not be at the expense of vital biodiversity”.  It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and	<ul style="list-style-type: none"> <li>Policy needs to be strengthened;</li> <li>Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill;</li> <li>Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action

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			<p>compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net gain requirement, I urge TRDC to take the lead on this issue and do the same.</p> <p>In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.</p>	<ul style="list-style-type: none"> <li>Swift Bricks or Boxes should be built in all new developments;</li> </ul>		
P1_002_09	No	<p>The proposal just simple does not meet this statement 'The Council will seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces'. It is removing hectares of land from recreational purposes.</p>	<ul style="list-style-type: none"> <li>Proposal does not meet statement of net gain in Green/ Blue Infrastructure when it is removing hectares of land for recreational purposes.</li> </ul>	Noted	No action	
P1_002_10	Not stated	<ul style="list-style-type: none"> <li>The policy lists a number of important sites as 'key assets'. I think that this list should include both Chorleywood Common and Chorleywood House Estate, as both cover a significant amount of land.</li> <li>Regarding the requirement to improve connectivity through Green and Blue corridors, it is vital that links between all Green sites and Blue sites are properly maintained and that the corridors are of sufficient width and nature to enable wildlife to confidently move through them.</li> <li>The 20m buffer around Rights of Way should be increased where the rights of way currently go through open green spaces, to either 30m or 40m</li> </ul>	<ul style="list-style-type: none"> <li>The Landscape Character Areas could be added to the list;</li> <li>Critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence;</li> <li>Proposed buffer around footpath should be 30m to 40m.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action	
P1_002_11	Yes	No Comment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action	
P1_002_15	Yes	<p>Not sure this is the right question as this section is about green and blue spaces and open air spaces. On that question. I think you say the right things. But don't follow up on it. How can destroying land for housing preserve this.</p>	<ul style="list-style-type: none"> <li>Destroying land for housing does not preserve it.</li> </ul>	Noted	No action	
P1_002_16	Yes	<p><b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming Environment Bill will make this mandatory for all new developments, and that development will "not be at the expense of vital biodiversity".</p> <p>It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net gain requirement, I urge TRDC to take the lead on this issue and do the same.</p> <p>In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.</p>	<ul style="list-style-type: none"> <li>Policy needs to be strengthened;</li> <li>Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill;</li> <li>Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> <li>Swift Bricks or Boxes should be built in all new developments;</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action	
P1_002_17	Yes	<p><b>Yes, but this should be strengthened.</b> Government policy is for a net gain of 10% biodiversity should be required on new developments. Ministers have pledged that the upcoming</p>	<ul style="list-style-type: none"> <li>Policy needs to be strengthened;</li> <li>Needs to be a net gain of 10% biodiversity for all new developments, as</li> </ul>	Noted. Work with neighbouring Hertfordshire is underway to support the biodiversity net gain target.	No action	



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			<p>Environment Bill will make this mandatory for all new developments, and that development will “not be at the expense of vital biodiversity”. It is increasingly recognised that developments, and proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity. Mitigation and compensation are often not satisfactory options, as detailed in the CPRE response to this consultation, and a Times article dated 27th July (attached). Many councils have reportedly adopted the 10% net gain requirement, I urge TRDC to take the lead on this issue and do the same.</p> <p>In addition, I urge TRDC to specify that swift bricks or boxes should be built in to all new developments and house extensions in the District. These are cheap bricks and the cost is negligible, while swift numbers in the District have dropped dramatically due to the lack of suitable nesting sites in modern houses and office blocks.</p>	<p>will be made mandatory by national government as part of Environment Bill;</p> <ul style="list-style-type: none"> <li>• Other Councils have adopted the 10% net gain in Biodiversity, need to do the same;</li> <li>• Swift Bricks or Boxes should be built in all new developments;</li> </ul>		
P1_002 18	No	<p>No - because the assets are written as formal designations of landscape protection, but the open space and agricultural nature of Three Rivers District Council are assets too. The quantity of building proposed on the green belt will undermine this policy option. In other words “there are the specific green places”, but it is the “spaces” between the “places” that matter too. As your opening line in 10.3 says ‘they [green and blue infrastructure] are essential to the success of the district’.</p>	<ul style="list-style-type: none"> <li>• quantity of building proposed on the green belt will undermine this policy option;</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action	
P1_002 19	No	<p>The Council should insist upon not "seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces".</p>	<ul style="list-style-type: none"> <li>• Council should insist upon not "seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces".</li> </ul>	Noted	No action	
P1_002 20	Not Stat ed	<ol style="list-style-type: none"> <li>1. The Associations generally support this Preferred Policy Option and the proposals for protecting and enhancing existing green and blue infrastructure networks. It is critically important, as indicated in the supporting justification, to create new infrastructure wherever possible, and to improve the potential for public access and recreational provision. The policies are generally compliant with the NPPF 2021 and the Hertfordshire Biodiversity Plan. The Associations do have some detailed comments which are set out below.</li> <li>2. Under sub-paragraph (2), it is suggested that the Landscape Character Areas could be added to the list. The identification of the blue water assets is welcomed, but it is suggested that some reference must be made to the importance of protecting the District’s rare chalk steams, which are a global priority habitat. Cross-reference should be made to Preferred Policy Options 15 Flood Risk and Water Resources and 21 Biodiversity.</li> <li>3. Whilst the requirement, in sub-paragraph (4), to improve connectivity between Green and Blue corridors is positive, the limits to apply to “key assets” should be removed, especially as there seems to be no definition of the term. It is vital that it apply to all green (and blue) sites, because any site that becomes cut off from the wider network will automatically suffer from a negative impact on its flora and fauna and a reduction in its</li> </ol>	<ul style="list-style-type: none"> <li>• The Landscape Character Areas could be added to the list;</li> <li>• Critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence;</li> <li>• Proposed buffer around footpath should be 30m to 40m.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action	

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			<p>biodiversity. It is also critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence.</p> <p>4. In sub-paragraph (5), the proposed 20m buffer around Rights of Way is a real improvement, but the Associations would query whether this is large enough when considering Rights of Way that pass through open green spaces. In those locations, it is recommended that the buffer be increased, to either 30m or 40m.</p>			
P1_002 23	Yes	If it means a gain in green spaces.		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	No action
P1_002 24	No	Too much green belt is being destroyed in the plan.		<ul style="list-style-type: none"> <li>Too much Green will be lost push back at govt targets</li> </ul>	<p>Noted. The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".</p>	No action
P1_002 27	No	There should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green areas and corridors to encourage and support biodiversity.		<ul style="list-style-type: none"> <li>Specific reference to maintaining smaller scale features, such as road verges, street trees, front and back gardens etc to support biodiversity.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action
P1_002 30	Not Stat ed	<p>1. The Landscape Character Areas should be added to the list under sub-paragraph 2,</p> <p>2. Wildlife corridors must be wide enough for wildlife to use them safely and freely.</p> <p>3. A buffer zone of 30m or 40m for footpaths would be better for rights of way which pass through open green spaces.</p>		<ul style="list-style-type: none"> <li>Add Landscape Character area to list under sub-paragraph 2;</li> <li>Wildlife corridors must be wide enough to be safely used by wildlife;</li> <li>Buffer Zone of 30m/ 40m for footpaths which pass through open green spaces.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action

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P1_002 33	Yes	I agree that the Preferred Policy Option for Green and Blue Infrastructure is the right approach. However, points 10 to 10.6 are all reasons applicable to our greenbelt sites currently in the proposed development areas CFS11/CSF69A/PCS47. It seems contradictory to have a policy on green and blue infrastructure, whilst then proposing mass development on greenbelt sites that are currently delivering the requirements of green and blue infrastructure areas.	<ul style="list-style-type: none"> <li>• General Agreement with approach;</li> <li>• Contradictory to have a policy on green and blue infrastructure whilst proposing mass development on Green Belt sites.</li> </ul>	Noted. The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	No action
P1_002 34	Yes	I agree that the Preferred Policy Option for Green and Blue Infrastructure is the right approach. However, points 10 to 10.6 are all reasons applicable to our greenbelt sites currently in the proposed development areas CFS11/CSF69A/PCS47. It seems contradictory to have a policy on green and blue infrastructure, whilst then proposing mass development on greenbelt sites that are currently delivering the requirements of green and blue infrastructure areas.	<ul style="list-style-type: none"> <li>• General Agreement with approach;</li> <li>• Contradictory to have a policy on green and blue infrastructure whilst proposing mass development on Green Belt sites.</li> </ul>	Noted. The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent	No action

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					approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release”.	
P1_002 36		Yes	Stipulations make sense	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_002 40		Yes	Yes	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_002 41		Yes	It is not sufficient to mention the corridors of the main rivers without also being clear about the width of these corridors and the importance of tributaries, such as the Mill Stream in Kings Langley. The Mill Stream, which splits from the River Gade for a short distance in Kings Langley, is also an asset and important wildlife corridor. <b>Further development on the banks of all rivers and streams should be avoided.</b>	<ul style="list-style-type: none"> <li>• Further development on the banks of all rivers and streams should be avoided.</li> </ul>	Noted	No action
P1_002 43		No	<ul style="list-style-type: none"> <li>• The policy lists a number of important sites as ‘key assets’. I think that this list should include both Chorleywood Common and Chorleywood House Estate, as both cover a significant amount of land.</li> <li>• Regarding the requirement to improve connectivity through Green and Blue corridors, it is vital that links between all Green sites and Blue sites are properly maintained and that the corridors are of sufficient width and nature to enable wildlife to confidently move through them.</li> <li>• The 20m buffer around Rights of Way should be increased where the rights of way currently go through open green spaces, to either 30m or 40m.</li> </ul>	<ul style="list-style-type: none"> <li>• Add Chorleywood Common and Chorleywood House Estate</li> <li>• Wildlife corridors must be wide enough to be safely used by wildlife;</li> <li>• Buffer Zone of 30m/ 40m for footpaths which pass through open green spaces.</li> </ul>	Noted. Policy has been amended in accordance with HCC representation.	No action
P1_002 44		Yes	Fine, but additional points of emphasis needed. There must be something specific about the sewage going down our three rivers, especially the Chess. Here would be a good place to promote the policy of re-wilding verges, hedgerows, etc and cutting grass less often.	<ul style="list-style-type: none"> <li>• Additional points of emphasis not stated.</li> </ul>	Noted	No action
P1_002 56		Yes	Seems reasonable	<ul style="list-style-type: none"> <li>• Agree with approach</li> </ul>	Noted	No action
P1_002 59		No	It is very important that Chorleywood Common and Chorleywood House Estate are included in the list of 'key assets'. It is imperative that the links between Green & Blue sites are secured and that these are wide enough to sustain the bio-diversity and allow wildlife to move easily between areas. The proposed 20m buffer needs to be increased to 20m either side of the Right of Way to enable passage of people and wildlife	<ul style="list-style-type: none"> <li>• Add Chorleywood Common and Chorleywood House Estate</li> <li>• Wildlife corridors must be wide enough to be safely used by wildlife;</li> <li>• Buffer Zone of 30m/ 40m for footpaths which pass through open green spaces.</li> </ul>	Noted. Green belt is a policy designation with specific purposes for including land within it. Green infrastructure is a broad term to define a “network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. The two are not the same	No action
P1_002 62		Yes	rights of way must be protected. Ensure less development of canal banks as residential land by way of permanent moorings	<ul style="list-style-type: none"> <li>• Protect rights of way.</li> <li>• Less development of canal ways</li> </ul>	Noted	No action
P1_002 66		Not Stat ed	Priorities for Green and Blue Infrastructure focus on conserving ..... Unless this is going to be adhered to it is simply giving a cursory nod to the included key assets and at both the planning and local plan stage is clearly ignored giving preference to any form of development.	<ul style="list-style-type: none"> <li>• Give cursory nod to included key assets at both planning and local plan stage is clearly ignored giving preference to any form of development.</li> </ul>	Noted	No action

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P1_002 71	Yes	This question is wrong, refers to previous section. I agree that green and blue infrastructure should be kept, and believe this is at odds with redefining green belt.	<ul style="list-style-type: none"> <li>Agree with approach but refers to previous section</li> </ul>	Noted	No action
P1_002 82	No	Do not agree with approach but no reason given.	<ul style="list-style-type: none"> <li>Do not agree with approach but no reason given.</li> </ul>	Noted	No action
P1_002 94		Key assets should include Chorleywood House Estate and also Chorleywood Common, wildlife corridors (green and blue) should be maintained between ALL sites to avoid biodiversity loss through sites being cut off. ALL rights of way should have wider buffers on either side than currently proposed to give light and space to flora and fauna and those using the rights of way. Using such rights of way should not feel like walking down an urban alleyway.	<ul style="list-style-type: none"> <li>Key assets should include Chorleywood House Estate and also Chorleywood Common;</li> <li>ALL rights of way need wider buffers on either side than currently proposed</li> </ul>	Noted. Green belt is a policy designation with specific purposes for including land within it. Green infrastructure is a broad term to define a “network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. The two are not the same	No action
P1_002 96	No	<p>Whilst there is much in this policy to be commended some key changes are required to make it truly sustainable:</p> <ul style="list-style-type: none"> <li>The policy lists a number of important sites as ‘key assets’. We recommend that this list should include both Chorleywood Common and Chorleywood House Estate, as both cover a significant amount of land.</li> <li>Whilst the requirement to improve connectivity through Green and Blue corridors is positive, the limits on this policy to apply to “key assets” only should be removed. It is vital that links between all Green sites and Blue sites are properly maintained, because any Green site that becomes cut off from the wider Green Network will then suffer a reduction in the sustainability of flora and fauna and its biodiversity. It is also vital that the corridors are of sufficient width and nature to enable wildlife to confidently move through them.</li> <li>The 20m buffer around Rights of Way is an improvement in the Local Plan but this buffer is not large enough when considering rights of way that currently go through open green spaces. 20m equates to 10m or 30 foot each side of the right of way, which is little more than the shadow cast by a house. This will still leave the users and wildlife on the footpath feeling relatively enclosed. We therefore recommend that this buffer be increased where the rights of way currently go through open green spaces, to either 30m or 40m.</li> </ul>	<ul style="list-style-type: none"> <li>Add Chorleywood Common and Chorleywood House Estate</li> <li>Wildlife corridors must be wide enough to be safely used by wildlife;</li> <li>Buffer Zone of 30m/ 40m for footpaths which pass through open green spaces.</li> </ul>	Noted. Green belt is a policy designation with specific purposes for including land within it. Green infrastructure is a broad term to define a “network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. The two are not the same	No action
P1_002 98	No	No, the Plan as it stands means hugely negative impact on our green and blue infrastructure.	<ul style="list-style-type: none"> <li>Will have a negative impact on Blue and Green Infrastructure</li> </ul>	Noted	No action
P1_003 00	Not Stated	Chorleywood Common and Chorleywood House Estate should be included on the list of “key assets”. Links between all Green sites and Blue sites should be maintained, not just “key assets”.	<ul style="list-style-type: none"> <li>Chorleywood Common and Chorleywood House should be on list of key assets.</li> </ul>	Noted. Noted. Green belt is a policy designation with specific purposes for including land within it. Green infrastructure is a broad term to define a “network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. The two are not the same	No action
P1_003 01	Not Stated	The Chilterns Conservation Board broadly supports this policy, and in particular commends the focus on the connections between the different elements of green and blue infrastructure under paragraph (2) and the treatment of the whole as a network which includes cultural heritage and scenic beauty as well as biodiversity and	<ul style="list-style-type: none"> <li>Welcome recognition in this policy of the particular status of the Chilterns AONB as benefitting from the “highest status of protection” under the NPPF, and not</li> </ul>	Noted. Note to be added referencing the possible expansion of the AONB boundary	Consult with Natural England to ascertain boundary change to the AONB.

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		<p>natural capital. We would welcome recognition in this policy of the particular status of the Chilterns AONB as benefitting from the “highest status of protection” under the NPPF, and not simply another piece of green infrastructure. We would recommend including a note in the supporting text to the policy explaining the potential for the boundary of the AONB to be extended during the plan period, in line with Natural England’s announcement on 24 July this year.</p> <p>We note the overlap between this PPO and criterion (n) of PPO15. Our suggestion for enhancing PPO15 with regard to the protection and enhancement of the area’s chalk streams and other watercourses could alternatively be placed alongside this PPO, or the watercourse element of the two PPOs be rationalised in some other way. We would be delighted to assist with appropriate wording. Consideration might be given in paragraph (3) to contributions being made to the enhancement or restoration of existing green and blue infrastructure (including making it safe and accessible) as well as the provision of new infrastructure. The long-term protection provided by AONB designation makes enhancements here particularly good investments. Note that the council is subject to a duty under section 85 of the Countryside and Rights of Way Act 2000 to have regard to enhancement as much as to protection of the AONB and developer contributions present an excellent opportunity to pursue that duty.</p>	<p>simply another piece of green infrastructure;</p> <ul style="list-style-type: none"> <li>• Consideration might be given in paragraph (3) to contributions being made to the enhancement or restoration of existing green and blue infrastructure (including making it safe and accessible) as well as the provision of new infrastructure.</li> </ul>		
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Q20. Should we have considered alternative options?						
P1_0041		Yes	What alternatives are they?	<ul style="list-style-type: none"> <li>• What alternatives are they?</li> </ul>	Noted. There are no viable alternatives to the protection of the green and blue Infrastructure.	No action
P1_0091		Yes	No alternatives suggested	<ul style="list-style-type: none"> <li>• No alternatives suggested</li> </ul>	Noted. There are no viable alternatives to the protection of the green and blue Infrastructure.	No action
P1_0209		Yes	It is for councillors to consider sensible, alternative options and proposal a range of those options	<ul style="list-style-type: none"> <li>• It is for councillors to consider sensible, alternative options</li> </ul>	Noted. There are no viable alternatives to the protection of the green and blue Infrastructure.	No action