

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Statutory Consultee Representations

Appendix 2 OPEN SPACE, PLAY SPACE, SPORT AND RECREATION

Q23. Do you think the Preferred Open Space, Play Space and Recreation is the right approach?						
SC_P1_00007_S Sport England	Sport England	No	<p>The preferred policy option is broadly supported as it seeks to safeguard sport and recreation facilities and makes provision for new residential development to provide for the sport and recreation provision that it generates. The policy is considered broadly to accord with Government policy in paragraphs 96 and 97 of the NPPF. Notwithstanding the general support for policy option 22, it is requested that the following amendments are made:</p> <p>Part 1(iv) of the policy should add 'it can be demonstrated that' at the start to make it clear that it is the applicant's responsibility to demonstrate that an open space/sport/recreation facility deficiency will not be created rather than the Council's;</p> <p>The criteria in part 8 of the policy should be broadened to cover indoor and outdoor sports facilities rather than just playing pitches as this part of the policy applies to all sports facilities not just outdoor playing pitches i.e. criteria 8a and 8c would equally apply to tennis/netball courts for instance.</p> <p>Part 8 should also not just require major development proposals to provide for sports facilities as all residential developments will generate a demand for additional sports facilities regardless of their size and the cumulative impact of several smaller developments would be the same as a single major development;</p> <p>Part 9 of the policy should require open spaces to be designed so that they are multifunctional as this will encourage the spaces to be used for physical activity by a range of groups within the community.</p>	<ul style="list-style-type: none"> Policy broadly supported and considered to accord with NPPF para 96 and 97. Notwithstanding the general support for policy option 22, it is requested that the following amendments are made: <ul style="list-style-type: none"> Part 1(iv) of the policy should add 'it can be demonstrated that' at the start to make it clear that it is the applicant's responsibility to demonstrate that an open space/sport/recreation facility deficiency will not be created rather than the Council's; The criteria in part 8 of the policy should be broadened to cover indoor and outdoor sports facilities rather than just playing pitches as this part of the policy applies to all sports facilities not just outdoor playing pitches i.e. criteria 8a and 8c would equally apply to tennis/netball courts for instance. Part 8 should also not just require major development proposals to provide for sports facilities as all residential developments will generate a demand for additional sports facilities regardless of their size and the cumulative impact of several smaller developments would be the same as a single major development; Part 9 of the policy should require open spaces to be designed so that they are multifunctional as this will encourage the spaces to be used for physical activity by a range of groups within the community. 	<p>Agree changes to policy part 1. Criteria 8 –Indoor sports facilities are now covered by Class E and therefore are permitted development.</p> <p>Agree amend policy to require all residential developments to provide for sports facilities. Agree amendments to Part 9 and require all spaces to be multifunctional.</p>	<p>Amend policy to incorporate Sport England Comments.</p>
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council		<p>Croxley Green Parish Council considers this policy requires more detail. In particular no recreation sites should be built on unless a locally acceptable alternative has been provided. Otherwise we support the approach in general.</p>	<ul style="list-style-type: none"> Supports general approach This policy requires more detail. In particular no recreation sites should be built on unless a locally acceptable alternative has been provided. 	<p>Noted.</p>	<p>Amended policy sets out criteria for loss of open space, play space, sport and recreation facilities.</p>
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Preferred Policy Option 22, Open Space, Play Space, Sport and Recreation</p> <p>HCC is expected to see reference to the ANGST standard and would like to refer you to the comments earlier on mapping areas of Green and Blue infrastructure deprivation on Preferred Policy Option 21.</p>	<ul style="list-style-type: none"> HCC is expected to see reference to the ANGST standard and would like to refer you to the comments earlier on mapping areas of Green and Blue infrastructure deprivation on Preferred Policy Option 21. 	<p>Agreed.</p>	<p>See policy option 21</p>
SC_00027_TFL Commercial Development	TFL Commercial Development		<p>Part 4 and 5 seems to repeat each other and they could be combined for clarity and succinctness. Part 7 notes that materials used should be sustainable, this element is more appropriately covered in Policy 13. Also, as currently worded it seems to imply that all materials must be sustainable which may not be possible.</p>	<ul style="list-style-type: none"> Parts 4 and 5 seem to repeat each other and could be combined for clarity and succinctness; As currently worded implies that all materials must be sustainable which may not be possible. 	<p>Noted</p>	<p>Policy amended for clarity.</p>
PL_00002			<p>1.40 Overall, it is considered that this is the right approach. However, some amends are required to ensure the Plan is sound.</p> <p>1.41 Specifically, it is suggested that variations be made, and the amenity and children's space play space requirements should be increased in flexibility with the 400m proximity distance specified to</p>	<ul style="list-style-type: none"> 400m is an arbitrary distance and policy should be amended to state that a 1200m distance (i.e. 17 minute walk) is an acceptable distance from a 	<ul style="list-style-type: none"> Noted. The Three Rivers Open Space Standards Paper (2019) provides information on the Fields in Trust guidelines for accessibility 	<p>No action</p>

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			<p>be increased "to within 400m a short walking distance, for example 0.75 miles / 1200m, particularly where footpaths and safe crossings are provided throughout this journey". Increasing the proximity by the suggested amount is justifiable as this remains a short walking distance for families (taking approximately 17 minutes) and would be safe by virtue of the footpaths and safe crossings which are provided.</p> <p>1.42 400m is considered to be an arbitrary figure and no substantive justification has been provided for this.</p>	<p>site to amenity and children's play space.</p>	<p>and these are recommended as the most appropriate form of benchmarking.</p>	
PL_00_014			<p>Overall, it is considered that this is the right approach. However, some amends are required to ensure the Plan is sound.</p> <p>Specifically, it is suggested that variations be made, and the amenity and children's space play space requirements should be increased in flexibility with the 400m proximity distance specified to be increased "to within 400m a short walking distance, for example 0.75 miles / 1200m, particularly where footpaths and safe crossings are provided throughout this journey". particularly where footpaths and safe crossings are provided. 400m is considered to be an arbitrary figure and no justification has been provided for this.</p>	<ul style="list-style-type: none"> 400m is an arbitrary distance and policy should be amended to state that a 1200m/0.75 distance is an acceptable distance from a site to amenity and children's play space. 	<ul style="list-style-type: none"> The Three Rivers Open Space Standards Paper (2019) provides information on the Fields in Trust guidelines for accessibility and these are recommended as the most appropriate form of benchmarking. 	No action
PL_00_021			<p>Flahive recognises the importance of, inter alia, recreation and sports facilities. However, Flahive considers that the preferred policy option as currently drafted is not consistent with the NPPF and therefore could result in the Local Plan being found 'unsound'. The NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless the 'tests' set out in Paragraph 97 are satisfied. This includes, inter alia, criterion a) which requires the undertaking of an assessment which clearly shows that the open space, buildings or land is surplus to requirements. Criterion iv) of the preferred policy option is loosely based on this requirement, although is more concerned with avoiding the creation of a deficiency in the local area, as opposed to potentially more broader matters which could constitute a facility being surplus to requirements. It in this context that Flahive suggests that criterion iv) is updated to reflect the requirements of criterion a) if NPPF Paragraph 97.</p>	<ul style="list-style-type: none"> Inconsistent with NPPF. NPPF (para. 99) criteria a) states that open space, sport and recreation facilities should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements. Criterion iv) refers to creation of deficiency in the area rather than matters of a facility being surplus to requirements. Criterion iv) should be updated to reflect the requirements of criterion a) in NPPF (paragraph 99). 	<ul style="list-style-type: none"> Noted. Amend criterion iv) to align with NPPF tests which requires the undertaking of an assessment which clearly shows that the open space, buildings or land is surplus to requirements. 	Policy updated to reflect NPPF.
PL_00_029			<p>The opportunity should be taken to incorporate areas of open space within allocated development sites. If allocated in full, the Site offers the potential to deliver significant provision to serve existing and future residents.</p>	<ul style="list-style-type: none"> Should incorporate areas of open space within allocated development sites 	<ul style="list-style-type: none"> Agreed. As stated in the Regulation 18 consultation, the location of new future provision of open space and play space depends on a District Council decision on housing site allocations and on planning permissions that may be granted both for windfall sites and future allocation sites (where such provision is required). As the designation of any new open and play spaces through future development proposals is uncertain, it is intended for any new open spaces and play spaces to be allocated as public open space and be included in the Policies Map at the nearest appropriate and possible time. 	To be considered at Regulation 19 local plan.
P1_00_002_	Yes	Agree this is the correct approach.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00_003	Yes	important to protect play areas and open space		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00_005	Yes	Nothing to add		<ul style="list-style-type: none"> No Comment 	Noted	No action
P1_00_006	Yes	Essential if we are to foster healthy living in the area. Again this approach is two-fold both facilitating mental and physical health and encouraging the fitness of children.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00_014	Yes	Sounds logical. Sad to see that the opening lines are about the loss of open space - it suggests it's more likely that open space is to be lost rather than new space being made available.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00_017	No	Specify and make mandatory		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00_019	Yes			<ul style="list-style-type: none"> No Comment 	Noted	No action

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P1_00 020	Yes	Must ensure that existing playgrounds, open recreational spaces and golf courses are not destroyed or built over. Preserve what we have.	<ul style="list-style-type: none"> Agree with approach. Ensure existing playgrounds, open recreational spaces and golf courses are preserved. 	Noted	No action
P1_00 021	Yes	Seems well planned	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 023	Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 024	Yes	These spaces are important for children. Equipment needs to be safe and well maintained.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 025	No	Reduction on open space	<ul style="list-style-type: none"> Disagree with approach and reduction on open space 	Noted	No action
P1_00 026	Yes	Clear Policy	<ul style="list-style-type: none"> Support 	Noted	No action
P1_00 028	Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 032	Yes	It's the right approach	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 033	Yes	Designs of outdoor recreation areas should be using materials that are recycled, and ideally using natural materials which is consistent of the character of the natural surrounding area. Also the sourcing of local materials would be highly advised.	<ul style="list-style-type: none"> Agree with approach; Outdoor recreational areas should use recycled materials. 	Noted	No action
P1_00 034	Yes	No Comment	<ul style="list-style-type: none"> No Objection 	Noted	No action
P1_00 038	Yes	Open spaces are so important for the young and old. They must be safe so people will feel secure using them, and local.	<ul style="list-style-type: none"> Support 	Noted	No action
P1_00 040	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"> Do not develop on Green spaces/ Only Develop Brownfield. 	Noted	No action
P1_00 041	No	I cannot understand why a council would ever agree to the loss of facilities unless the developer was forced to create improved, larger, better facilities for residents.	<ul style="list-style-type: none"> Council should not agree to loss of these facilities unless the developer is forced to create improved, larger facilities. 	Noted	No action
P1_00 046	Yes	Open space and play areas are very important, particularly during lockdowns	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 047	No	This policy should expressly prohibit the building of new homes in areas where building at scale would inevitably lead to an assault on green spaces and woodland – as without this the Draft Local Plan goes on to suggest the desecration of various green spaces.	<ul style="list-style-type: none"> Should not allow develop to take place which leads to loss of green spaces and woodland. 	Noted	No action
P1_00 048	Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	No action
P1_00 053	Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 054	Yes	These need protecting and preserving for the health and well-being of all	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 055	Yes	A benefit to the area.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 056	Yes	WITH RESERVATIONS: Para 10.40 (6.1) and 7. How is the play equipment referred to going to be maintained, and ultimately replaced, during the lifespan of the development? Para 10.4 (7). Seems to be a presumption that 'the elderly' do not need open space. This is wrong both in principle and in practice.	<ul style="list-style-type: none"> How is play equipment going to be maintained? Para 10.4 (7). Presumption 'elderly' do not need open space. This is wrong. 	Noted	No action
P1_00 058	Not Specified	Green spaces provides positive input in mental health and joy to those walking these green spaces. Removing these would put pressure on Three Rivers Council to find ways to provide increased mental health services.	<ul style="list-style-type: none"> Do not remove Green Spaces as they are positive for people's mental health. 	Noted	No action
P1_00 063	Yes	Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 064	Yes	xx	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 065	Yes	There is definite need for more sports facilities and enhancing current facilities. There are already too many sports clubs and in particular community football clubs that are short on pitches now. Add on to this the need for additional housing and that brings more children who all want and need local amenities and sports clubs.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 066	No	Any developments must make additional open space developments outside the development so all in the area can benefit, otherwise only the people in the development will get the use of this	<ul style="list-style-type: none"> Development must make additional open space developments outside development. 	Noted	No action
P1_00 068	No	I do not want to see rural land bulldozed to provide "play facilities" if they turn out to be the broken glass shrewn example we have in Maple Cross. Those play parks I know in the area, all seem to suffer the same kind of misuse and vandalism - caused by the lower grade inhabitants - this kind of thing doesn't occur at Rickmansworth Tennis Club – draw your own conclusions.	<ul style="list-style-type: none"> Do not develop rural land to provide 'play facilities' if not up to standard 	Noted	No action
P1_00 069	No		<ul style="list-style-type: none"> Do not agree with approach but no reason given 	Noted	No action

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P1_00 074_I Mercer			Its good that there is the “Open Space, Sport and Recreation Study (2019)” but not at all clear if the council plans to do anything about it or whether instead it is waiting for developers to submit plans.	<ul style="list-style-type: none"> Agree with approach but unclear how Council will implement. 	Noted	No action
P1_00 076	No		There isn't an excess of play space or amenities. We need plenty of it to give our children a enjoyable and safe childhood. Open green spaces are great - take a look at the swillet, an open green space with lovely views, it is always busy with different groups of children playing together across different age groups and schools. What an asset – an open grassy area. The policy saying there shouldn't be large grassy areas doesn't make sense, unless you mean there should also be a playpark? This policy is very unclear and unconvincing.	<ul style="list-style-type: none"> Need plenty of play space/ amenities; Policy saying shouldn't be large grassy areas doesn't make sense, unless you mean should also be a playpark? Policy is very unclear and unconvincing. 	Noted	No action
P1_00 078	Yes		Reasonably balanced.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 080_	Yes		N/A	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 084	Yes		We need to keep any green space for people young and old to breath in clear air especially after the pandemic of the last 18 months.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 086	No		I hate to be cynical but I don't believe all the protection, replacement of provision offered will actually happen	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 088	No		9. Why are large open spaces not considered? EG. Swannells Walk the fairly new housing development. I run though the footpath regularly and I have never seen a child in the young childrens play area. NEVER. But i regularly see children playing football in the car park! The council have let the grass grow high and encouraged the wild flowers, but to the detriment of the older children and to residents. Balls being kicked against fences all evening is driving me MAD, I am listening to it as I type this. You really must consider the needs of older children. 10. You are gradually removing the ability for people to grab a quick bite of nature and green space. Dog walkers and lots of other people like to have a daily walk maybe along the river chess/colne or jog around chorleywood common. But the instance of discouraging cars and not making new car parking spaces, whilst accepting more are more people are moving to the area, means people who work, or have busy lives with children can't take these experiences up. For example unless you live near to the Lakes, Bury, Inns, Stockers, Springwell, Aquadrome you can't take an evening stroll if you were a shift worker for example because there is nowhere to park. The gates are shut and the local roads heaving with cars.	<ul style="list-style-type: none"> Large open spaces need to be considered such as Swannells Walk; Need to consider needs of older children, playing football in a car park and hitting against objectors fence; Discouraging cars and not making new car parking spaces, whilst accepting more are more people are moving to the area, means people who work, makes no sense; Unless live near to the Lakes, Bury, Inns, Stockers, Springwell, Aquadrome can't take an evening stroll if you were a shift worker for example because there is nowhere to park. 	Noted	No action
P1_00 089	Yes		As mentioned play areas, recreation, sports areas should be kept with less houses built.	<ul style="list-style-type: none"> Agree with approach but less houses should be built 	Noted	No action
P1_00 091	No		There's nothing wrong with large areas of open grass, its more than enough for playing, open space, and recreation. It's even therapeutic	<ul style="list-style-type: none"> Nothing wrong with large areas of open grass, its more than enough for playing, open space, and recreation. 	Noted	No action
P1_00 096	Yes		Seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 097	Yes		Maintain existing facilities and only increase where essential. Important to protect Commons.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 098	Yes		All current public spaces must be protected in all cases.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 099	Yes		Commons and other public spaces should be protected at all costs if used by the community.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 102	Yes		Open space, sports and recreation facilities are critical for quality of life and must not be adversely affected by development. Developers should be forced to provide additional facilities as part of their development.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 106	No		Destructing of everything. People move into these family green areas because they like green areas, not because they want it filled with flats.	<ul style="list-style-type: none"> Will destroy everything. 	Noted	No action
P1_00 107	Yes		..as long as no loss of greenbelt is involved	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 108	No		Doesn't go far enough. Three Rivers is woefully unde-resourced with regard to parks etc	<ul style="list-style-type: none"> Policy does not go far enough 	Noted	No action
P1_00 110	Not Specified		PPO22 relates specifically to more formal open spaces rather than the provision of informal open space such as enhancing and extended the network of public rights of way and places where people can enjoy being outside, observe wildlife and experience tranquillity. The ambition in PPO22 (para 9) especially in respect of avoiding large expanses of 'open grass' should be more specific; closemown grass is less valuable than grassland managed as a wild-flower habitat which is being increasingly appreciated. Para 10.49 could be much more ambitious in scope, to ensure that informal recreation facilities, in particular public paths, especially in the more rural parts of the District, can be expanded. The importance of the two major pathways, the Hertfordshire Way and the Chiltern Way, should be recognised and the subject of policy to protect and enhance their contributions to health and wellbeing.	<ul style="list-style-type: none"> Para 10.49 could be more ambitious in scope to ensure informal recreation facilities in particular public paths, especially in the more rural parts of the District, can be expanded. Importance of two major pathways, the Hertfordshire Way and the Chiltern Way, should be recognised and subject of policy to protect and enhance their contributions to health and wellbeing. 	Noted	Policy on health and well-being deals with this comment.
P1_00 112	Yes		Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 113	Yes		no reason	<ul style="list-style-type: none"> Agree with approach 	Noted	No action

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P1_00 114	Yes	Concur		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 116	Yes	I agree with the policy as stated.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 117	Yes	Fine as is		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 119	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"> Land is sanctuary for wildlife 	Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	No action
P1_00 120	Yes	Seems sensible. But who is to monitor this?		<ul style="list-style-type: none"> Agree with approach 	Noted.	No action
P1_00 123	Yes	I like this, particularly sections 9 and 10. I like the emphasis on not having large areas of open grass and of resisting development on commons.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 127_	Yes	/		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 130	Yes	There are more than enough open spaces		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 131	No	Section 6 - badly worded. Are you really saying kids get 2% of the 10% (i.e. 0.2% of the total plot)? Or do you mean 20% of the overall 'open space' = 2% of the total plot? 'Council will seek to ensure the proper maintenance of the space' - this should be mandated. Otherwise, looks logical.		<ul style="list-style-type: none"> Confusing what % of a plot children will get. 	Noted	No action
P1_00 132	Yes	balanced approach is best		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 135	No	The policy option states that proposals for new or existing open space should be designed to a high standard and should not consist of large areas of open grass. This is a good start, but there should be a requirement for any major development with open space to submit an open space design and management plan. This would ensure the correct balance of leisure, recreation, and biodiversity and that the quality of the provision is not degraded over time. It is important that new open space meets a balance of needs to reduce over reliance motor vehicles for accessing larger sites such as the Aquadrome, which are extremely popular and sometimes congested.		<ul style="list-style-type: none"> Need major development with open space to submit an open space design and management plan; important that new open space meets a balance of needs to reduce over reliance motor vehicles for accessing larger sites such as the Aquadrome, 	Noted	No action
P1_00 137_	No	Yes I agree		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 140	No	There should not be development on any Greenbelt for housing. These open spaces should be developed into structured open areas for the public. Open areas for families are more important than ever.		<ul style="list-style-type: none"> Should not be development on Green Belt for housing; Open areas for families more important than ever 	Noted	No action
P1_00 142_	No	.		<ul style="list-style-type: none"> Do not agree with approach but no reason given 	Noted	No action
P1_00 144	Yes	We all value recreation space		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 147	Yes	Fine		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 148	Yes			<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 150	No	I think the PPO could be enhanced by including provisions for informal open space such as enhancing and extended the network of public rights of way and places where people can enjoy being outside, observe wildlife and experience peacefulness. Inclusion of assurances that informal recreation facilities, in particular public paths, especially in the more rural parts of the District, can be expanded would be welcome. The importance of the two major pathways, the Hertfordshire Way and the Chiltern Way, should be recognised and the subject of policy to protect and enhance their contributions to health and wellbeing.		<ul style="list-style-type: none"> Enhanced to include provisions for open space. Importance of two major pathways, the Hertfordshire Way and the Chiltern Way, should be recognised and subject of policy to protect and enhance their contributions to health and wellbeing 	Noted	Policy has been updated to reflect NPPF
P1_00 151	Yes	The provision of open spaces and play areas is very important for mental health, as has been demonstrated during the pandemic. This approach seems to prioritise that.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 155	Yes	It is important to encourage people of all ages to exercise, it is good for mental health and community building, also excellent to use this as an opportunity to create new habitats for wildlife alongside.		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 157	No	The policy could be improved by including public rights of way and open spaces for people to enjoy in an informal way to improve the populations general health and wellbeing.		<ul style="list-style-type: none"> Policy could be improved by including public rights of way and open spaces for people to enjoy in an informal way 	Noted	No action
P1_00 160	Not Stated	<p>1) Where residential housing is planned, it is unacceptable to allow a reduction in amenity space provision where there is children's play space within 400m of the development. The value of amenity space and outdoor play is recognised as important for the health and wellbeing of children. Play space should be adjacent to the property. This paragraph should be altered.</p> <p>2) Sub section ii allows for a reduction in the 10% of the site area for open space, where the development is specialised accommodation for the elderly. This again is discrimination against the elderly. They should be entitled to amenity space and a pleasant outlook as much if not more than the ordinary person or family. This paragraph should be amended.</p> <p>RESIDENTIAL AMENITY SPACE</p>		<ul style="list-style-type: none"> Where residential development is to take place, unacceptable to reduce children's play space within 400m of the development. Paragraph should be altered Sub section ii allows for reduction in 10% of the site area for open space, where the development is specialised accommodation for the elderly, discrimination against the elderly; 	Noted.	Policy to be updated to reflect NPPF.

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			<p>1) Guidelines are set out for residential amenity space for flats para b (space may be allocated specifically to each flat or provided communally) □ 1 bed flat - 15sqm; □ 2 or more bed flat – 25sqm. This appears to be in direct conflict with the earlier guideline on Amenity Space which allows for a reduction if a development is within 400m of a play area. These guidelines should not be allowed to be reduced.</p> <p>2) Para c) Specialist and Supported Housing for older people: The standard states that 15sqm per bedspace to be provided communally. Crucially it states that “ The minimum depth and width of balconies and other private external spaces should be 1500mm.” A balcony meeting this specification provides an amenity space of 2.25sqm. The standard set at para 1 above indicates an amenity space for a one bedroom flat at 15sqm. This is again discrimination against the elderly. Taking into account health and well-being, does the Council really think that an elderly person, perhaps with a Zimmer frame or wheelchair can manoeuvre in a space 1.5m by 1.5m? This discrimination should be rectified.</p> <p>INTERNAL AND EXTERNAL AMENITY SPACE STANDARDS The draft plan states that” All residential development should meet or exceed the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG) unless a different approach is robustly justified. Appropriate consideration should also be given to: 1) Providing sufficient space for the general and specific storage needs of residents (including those with disabilities)” 2) b) Floor layouts which provide for practical usable space and a good standard of amenity; and 3) c) The provision of rooms which are designed to function comfortably and efficiently for their intended purpose.</p> <p>It is clear from the recent development at South Oxhey Central, that the standards set for internal amenity space are insufficient, particularly where storage is concerned as many flats store items on the balconies. To have the whole living space – kitchen, lounge and dining area in one small room with insufficient space for storage is unacceptable. Many of these flats are occupied by families with children. Covid has taught us that amenity space and decent surroundings are crucial for our mental and physical well-being. The standards are inadequate and should be improved.</p>	<ul style="list-style-type: none"> Residential amenity space for flats in para b appears to be in direct conflict with earlier guidance on amenity space; Minimum depth and width of balconies and other private external spaces should be 1.5m. Discrimination against the elderly as this does not offer enough space to move around; At recent development at South Oxhey Central, standard set for internal amenity space insufficient, particularly where storage is concerned as many flats store items on the balconies. 		
P1_00 162	Yes	Open spaces are vital		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 163	Yes	Because of the importance of these areas		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 166_	Yes	Kids need open spaces to play		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 169	Yes	There should targets set for defining NEW open space particularly for organised sports. Sites across three rivers are at capacity - children are being turned away from clubs and travelling significant distance as there local clubs are at capacity or don't have a home (see recent news Croxley football club)		<ul style="list-style-type: none"> Need targets set for defining new open space, particularly for organised sports, as existing sites are at capacity. 	Noted. The TRDC open spaces, sport and recreation study sets out standards for all types of open spaces.	No action
P1_00 170	Yes	See other Comments ref lack of enforcement...		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 174	Yes	No Comment.		<ul style="list-style-type: none"> No Comment 	Noted	No action
P1_00 181	Not Specified	On page 74 Recreation item 9) needs to clarify what is “high standard” and who is going to evaluate this.		<ul style="list-style-type: none"> Page 74, item 9 – Clarify what is high standard and who will evaluate this. 	Noted. The TRDC open spaces, sport and recreation study sets out standards for all types of open spaces. Quality is assessed in terms of access, facilities on site and catchment area.	No action
P1_00 183_M Allum	Yes	As above		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 184	No	No recreation sites should be built on unless a locally acceptable alternative has been provided.		<ul style="list-style-type: none"> No recreation sites should be built on unless alternatives are provided. 	Noted	No action
P1_00 186	No	The local spaces for children to play are already severely overcrowded. Adding additional homes into the area will only increase the pressure on these facilities.		<ul style="list-style-type: none"> Local spaces for children are overcrowded. Adding homes will only increase pressure on facilities. 	Noted	No action
P1_00 187	No	No recreation sites should be built on unless a locally acceptable alternative has been provided.		<ul style="list-style-type: none"> No recreation sites should be built on unless alternatives are provided. 	Noted	No action
P1_00 190	Yes	Sensible		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 201	Yes	Children need their space to play - it's important for them to have outside space accessible		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 206	Yes	NA		<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 209	No	The proposed plans are the antithesis of this		<ul style="list-style-type: none"> Proposed plans are antithesis of this. 	Noted	No action

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P1_00 211	No	There should be a requirement for any major development with open space to submit an open space design and management plan. This would ensure the correct balance of leisure, recreation, and biodiversity and that the quality of the provision is not degraded over time. It is important that new open space meets a balance of needs to reduce over reliance motor vehicles for accessing larger sites such as the Aquadrome, which are extremely popular and sometimes congested.	<ul style="list-style-type: none"> Need major development with open space to submit an open space design and management plan; important that new open space meets a balance of needs to reduce over reliance motor vehicles for accessing larger sites such as the Aquadrome, 	Noted	No action
P1_00 215	No	Leave the open spaces we have as is and encourage the use of them for sports and outdoor clubs. Don't build on them and then build inside sports facilities	<ul style="list-style-type: none"> Leave existing open spaces alone and encourage use of them for sports/ outdoor clubs. 	Noted	No action
P1_00 218	Yes	Mention could be made here of the opportunities for local food production through community gardens and rural enterprises, as well as the re-wilding of our recreational spaces and fringes to the play and sporting greens.	<ul style="list-style-type: none"> Mention opportunities for local food production via community gardens; Re-wilding of recreational spaces and fringes to play and sporting greens 	Noted	No action
P1_00 219	No	There should be no reduction in existing leisure facilities at any cost. I suspect that the building of centres of fitness and leisure would incur cost to the individual and exclude 'fresh air' activity.	<ul style="list-style-type: none"> Do not reduce existing leisure facilities 	Noted	No action
P1_00 222		The policy option states that proposals for new or existing open space should be designed to a high standard and should not consist of large areas of open grass. This is a good start, but there should be a requirement for any major development with open space to submit an open space design and management plan. This would ensure the correct balance of leisure, recreation, and biodiversity and that the quality of the provision is not degraded over time. It is important that new open space meets a balance of needs to reduce over reliance motor vehicles for accessing larger sites such as the Aquadrome, which are extremely popular and sometimes congested. The supporting text mentions that consideration will be given to more diverse forms of provision such as community orchards. However, we believe that more importance should be placed on the allocation of open space for a range local food production which helps communities become more resilient to climate change. An objective in the Council's Climate Change Strategy is "to encourage local food production through the development of community gardens, allotments, and orchards, with co-benefits for mental health, and enable the creation of these sites in new developments and regeneration projects."	<ul style="list-style-type: none"> Need major development with open space to submit an open space design and management plan; Important that open space is allocated for local food production and helps communities become resilient to climate change 	Noted	No action
P1_00 223	Yes	It is difficult to have a one-size-fits-all approach to this. Maintaining existing levels and increasing them according to local population sounds acceptable. However, some areas need to be retained as they are as they add to the character (charm) of the place, eg the cricket field on Chorleywood Common.	<ul style="list-style-type: none"> Difficult to have one size fits all approach; Some areas such as Chorleywood Common need to be retained. 	Noted	No action
P1_00 224	Yes	yes... but again... nothing must be done to the detriment of the space. that will just contradict the benefits of open fields and walking etc	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 227	No	Recreation sites should be built on unless a locally acceptable alternative has been provided.	<ul style="list-style-type: none"> No recreation sites should be built on unless alternatives are provided. 	Noted	No action
P1_00 232	No	The policy option states that proposals for new or existing open space should be designed to a high standard and should not consist of large areas of open grass. This is a good start, but there should be a requirement for any major development with open space to submit an open space design and management plan. This would ensure the correct balance of leisure, recreation, and biodiversity and that the quality of the provision is not degraded over time. It is important that new open space meets a balance of needs to reduce over reliance motor vehicles for accessing larger sites such as the Aquadrome, which are extremely popular and sometimes congested. The supporting text mentions that consideration will be given to more diverse forms of provision such as community orchards. However, we believe that more importance should be placed on the allocation of open space for a range local food production which helps communities become more resilient to climate change. An objective in the Council's Climate Change Strategy is to encourage local food production through the development of community gardens, allotments, and orchards, with co-benefits for mental health, and enable the creation of these sites in new developments and regeneration projects	<ul style="list-style-type: none"> Need major development with open space to submit an open space design and management plan; Important that open space is allocated for local food production and helps communities become resilient to climate change 	Noted	No action
P1_00 233	No	I disagree that Preferred Policy Option for Open Space, Play Space, Sport and Recreation is the right approach. Why would we replace established quality greenbelt open space for synthetic token play "open" space, simply to justify mass development?	<ul style="list-style-type: none"> Do not agree with approach. Do not replace Green Belt with synthetic token open space. 	Noted	No action
P1_00 234	Yes	I disagree that Preferred Policy Option for Open Space, Play Space, Sport and Recreation is the right approach. Why would we replace established quality greenbelt open space for synthetic token play "open" space, simply to justify mass development?	<ul style="list-style-type: none"> Do not agree with approach. Do not replace Green Belt with synthetic token open space. 	Noted	No action
P1_00 236	Yes	Stipulations make sense	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 240	Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 244	Yes	Important	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 252	Yes	Obviously for wellbeing there has to be enough open space and areas dedicated to recreation catering to as many forms as possible so having policy option tailored to this is the right approach.	<ul style="list-style-type: none"> Agree with approach. For wellbeing has to be enough open space and areas dedicated to recreation and catering, policy is the right approach. 	Noted	No action
P1_00 256_	Yes	Seems reasonable	<ul style="list-style-type: none"> Agree with approach 	Noted	No action

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P1_00 262	Yes	new residential developments must not exacerbate deficiencies in open space	<ul style="list-style-type: none"> New residential development must not exacerbate deficiencies in open space. 	Noted	No action
P1_00 266	Not Stated	Should the insufficient level of allotments be addressed in this section – haven't found it elsewhere and it is an identified need with multiple benefits.	<ul style="list-style-type: none"> Should insufficient allotment levels be addressed in this section, as not found elsewhere in the Local Plan? 	Noted	No action
P1_00 282	Yes	See above.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 310	No	The need for outdoor spaces has never been more essential to our welfare. Many neighbours have become dog owners since the pandemic and safe places to walk are hard to find. The Aquadrome is extremely busy and to have this unique facility hosting further residents and visitors will make it intolerable.	<ul style="list-style-type: none"> Need open space more than ever. Aquadrome is extremely busy and to have this unique facility with more housing would make it intolerable. 	Noted	No action
Q23. Should we have considered alternative options?					
P1_00 014_	Yes	As before	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 017	Yes	As Above	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 023	Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	No action
P1_00 033	Yes	The construction process of recreation areas should also have impact assessments on the area, similar to those of housing plans, where it considers all types of impacts on the environment and local community.	<ul style="list-style-type: none"> Construction process of recreation areas should have impact assessments on the area. 	Noted	No action
P1_00 040	Yes	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"> Do not develop Green spaces. 	Noted	No action
P1_00 041	Yes	What alternatives are other councils adopting?	<ul style="list-style-type: none"> What alternatives are the Council considering. 	Noted. There are no alternatives to the protection of existing open spaces, sports and recreation and play facilities. The policy seeks to safeguard existing open spaces and sets out a criteria approach to the loss of open spaces.	No action
P1_00 047	Yes	The policy should expressly prohibit the building of new homes at scale in areas where this building would inevitably lead to an assault on green spaces and woodland, which is something that would be triggered by the Local Plan as it stands.	<ul style="list-style-type: none"> Do not allow building of new homes which will lead to overdevelopment of green spaces and woodland 	Noted	No action
P1_00 065	Yes	The allocation of sports facilities, in-particular, football where Croxley Green FC has c. 450 boys & girls but do not have their own club grounds. The club relies on council run facilities, schools and given the number of layers (and growing) there is pressure on training facilities let alone pitches to play at weekends. Add to that other local clubs (chorleywood & watford clubs) are chasing the same locations, putting up costs for hiring and ultimately that increases costs for the club subscriptions. There needs to be a central hub for the club & not allocating small areas of land by developers as "lip-service" to dealing with the lack of good quality community pitches for community sports clubs.	<ul style="list-style-type: none"> Need to allocate sports facilities, in particular Croxley Green FC which do not have their own sports club grounds; Other clubs such as Chorleywood and Watford are chasing the same locations and puts up costs 	Noted	No action
P1_00 066	Yes	See above	<ul style="list-style-type: none"> Development must make additional open space developments outside development. 	Noted	No action
P1_00 068	Yes	They are too many to list. How do you equate not advocating large open areas of grass and at the same time plumping for sports pitches? Open spaces that are left to "rewild" in the modern idiom - rapidly look a mess and attract more.	<ul style="list-style-type: none"> How does TRDC equate not advocating large open areas of grass but also plumping for sports pitches. 	Noted.	Policy has been updated to reflect NPPF.
P1_00 076	Yes	Leave the play and recreation spaces as they are.	<ul style="list-style-type: none"> Leave recreational spaces as they are 	Noted	No action
P1_00 078	Yes	Requiring more trees to be planted.	<ul style="list-style-type: none"> Require more trees to be planted 	Noted	No action
P1_00 088_	Yes	Larger spaces for older children and car parking spaces required.	<ul style="list-style-type: none"> Larger spaces for older children and car parking spaces required. 	Noted	No action
P1_00 106	Yes	Yes, just forget about it and stop ruining the area.	<ul style="list-style-type: none"> Stop ruining the area. 	Noted	No action
P1_00 107	Yes	Resisting building on common land or greenbelt isn't good enough. It mustn't happen!!!	<ul style="list-style-type: none"> Resist building on common land and Green Belt 	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	No action

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					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".	
P1_00 108		Yes	Give more people gardens. Encourage schools etc to open their facilities in the holidays to communities	<ul style="list-style-type: none"> Give more people gardens Encourage schools to open their facilities in the holidays; 	Noted	No action
P1_00 119		Yes	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"> Land is sanctuary for wildlife. 	Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	No action
P1_00 123		Yes	I would have liked to see something about rewilding or 'deparking' some of our open spaces - Croxley Green and, indeed, parts of Chorleywood Common are too much like municipal parks for me. A bit about encouraging wildflowers and diversity would be good.	<ul style="list-style-type: none"> Have info on rewilding or 'deparking' some of the spaces. Rewild Croxley Green and Chorleywood Common for example 	Noted	No action
P1_00 132		Yes	collaborate with neighbouring councils	<ul style="list-style-type: none"> Collaborate with neighbouring councils. 	Noted	No action
P1_00 135		Yes	Horticulture for Health Get with the programme pronto please. The supporting text mentions that consideration will be given to more diverse forms of provision such as community orchards. However, we believe that more importance should be placed on the allocation of open space for a range local food production which helps communities become more resilient to climate change. An objective in the Council's Climate Change Strategy is 'to encourage local food production through the development of community gardens, allotments, and orchards, with co-benefits for mental health, and enable the creation of these sites in new developments and regeneration projects'.	<ul style="list-style-type: none"> Supporting text mentions consideration will be given to more diverse forms of provision such as community orchards; Objective in Council's climate strategy is to encourage local food production, more importance should be placed on this. 	Noted	No action
P1_00 209		Yes	It is for councillors to consider sensible, alternative options and proposal a range of those options	<ul style="list-style-type: none"> For councillors to consider alternative options 	Noted	No action
P1_00 215		Yes	The world is warming. Encourage the use of our existing outside space. Don't build to create indoor.	<ul style="list-style-type: none"> Encourage use of existing outdoor space, don't build indoor spaces 	Noted	No action
P1_00 218		Yes	Mention could be made here of the opportunities for local food production through community gardens and rural enterprises, as well as the re-wilding of our recreational spaces and fringes to the play and sporting greens.	<ul style="list-style-type: none"> Mention local food production and helps communities become resilient to climate change, as well as rewilding of recreational spaces. 	Noted	No action
P1_00 219		Yes	As above	<ul style="list-style-type: none"> Do not reduce existing leisure facilities 	Noted	No action
P1_00 244		Yes	Throughout the Plan, there could be a much greater emphasis on private car ownership with all its consequences (pollution, carbon emissions, climate change, etc.) In particular the question of car parking seems understated. How much additional land is going to be lost to accommodate the extra vehicles that come with the increased population?	<ul style="list-style-type: none"> Much greater emphasis on damages of private car ownership, as well as car parking to accommodate extra vehicles with increased population. 	Noted	No action
P1_00 256		Yes	Compulsorily purchase inactive farmland for public amenity at prices that reflect there is no planning consent on the land Covid lockdowns have revealed exceptional circumstances that exist at all time - in that there is not enough public amenity open space in the district	<ul style="list-style-type: none"> Compulsory purchase inactive farmland for public amenity; covid has shown that there is not enough public spaces in the district. 	Noted.	No action
P1_00 262_L Mead		Yes	More local swimming pools	<ul style="list-style-type: none"> More local swimming pools 	Noted	No action
P1_00 282_A Jenkins		Yes	Agree with approach.	<ul style="list-style-type: none"> Agree with approach 	Noted	No action

