

Appendix 2 - REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation

ADAPTING TO CLIMATE CHANGE AND SUSTAINABLE CONSTRUCTION

REPRESENTATION REFERENCE	REPRESENTOR	SITE REF / POLICY / PART OF DOCUMENT	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
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Q14. Do you think the Preferred Policy Option Adapting to Climate Change and Sustainable Construction is the right approach?						
SC_00 009_S arratt Parish Council	Sarratt Parish Council		We support the inclusion of sustainable flood management, but we are concerned that this is open to wide interpretation. So if there are any standards or frameworks that can be referenced, we believe that would help ensure the desired outcomes We support the inclusion of water consumption targets. While the target is still too high, we note the limitations of scope of authority We support the inclusion of BREEAM standard. We question the reason to limit application of this standard to major non-residential development and why to include a very broad escape clause “unless this is demonstrated to be unviable”. We urge that this very good requirement is revised and strengthened to cover all developments. If BREEAM is not deemed usable for smaller developments there are other appropriate standards which could be used to aid desired outcomes.	<ul style="list-style-type: none">Support inclusion of sustainable flood management but concerned that they are open to interpretation and suggests use of standards or frameworksSupports the inclusion of water consumption targets – would like higher but understands limitations of scope of the authoritySupport BREEAM standards but questions why only applied to major non-residential development and the inclusion of ‘unless this is demonstrated to be unviable’ and requests BREEAm applies to all developments or other standard used	<ul style="list-style-type: none">Noted. Hertfordshire County Council are the Lead Local Flood Authority (LLFA) and set the requirements for the sustainable drainage systems that the policy relates to. The LFA sets guidance and standards which are available at https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/water/surface-water-drainage/guidance-for-developers.pdfNoted. Reference to the water efficiency standards set out within Building Regulations.BREEAM sets the standard for best practice in sustainable building design, construction and operation. These standards can only be applied to major non-residential development and cannot be adapted for residential development. The Code for Sustainable Homes which was used for residential developments has now been withdrawn and has been replaced by new national technical standards which comprise new additional optional Building Regulations regarding water and access as well as a new national space standard (this is in addition to the existing mandatory Building Regulations). These additional options (which are comparable with the requirements for the former Code for Sustainable Homes Level 4) can be required by a planning permission and are included in the Draft Local Plan.	Revise policy to address concerns.
SC_00 019_W atford Boroug h Council	Watford Borough Council	yes	The approach to reducing carbon emissions when new development comes forward is supported. This will contribute towards addressing the climate change emergency	<ul style="list-style-type: none">support	Noted	No action
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		The policy only mentions major developments. All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated. There should be a preference for using low embodied carbon materials. Also attention should be paid to the need to mitigate extreme weather, including excessive heat. Buildings should be designed to be kept cool by low carbon means such as shading and ventilation. We support the approach in general.	<ul style="list-style-type: none">All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, not just major schemes.	Noted.	No action
SC_00 024_A bbots	Abbots Langley Parish Council		The statement appears woolly and unenforceable, we need a list of bullet point requirements in our policy. We should set a limitation of the carbon footprint of materials to ensure that	<ul style="list-style-type: none">Want a bullet point list of requirements in the policy as current policy unenforceable.	Noted.	No action

Langley Parish Council			we can bolster local economies and create communities of local character. Sustainability Statements are generally a ‘copy and paste’, exercise and generally rarely complied to. How do we monitor its compliance? Also maybe we should have a policy that all new sites have to utilise rainwater and sewage is dealt with on site, or if not, could the new housing be forced to have sewage holding tanks to operate in times of heavy rain to avoid overloading the sewers? We have to tackle this at the point of planning and construction. I do not think the policy really takes into account the housing we are getting, and the effect on the already overburdened infrastructure.			
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Sustainable Hertfordshire The county council declared a climate emergency in July 2019, as a response to the need to act locally, having observed the global impacts of climate change including those from within Hertfordshire: dry riverbeds, reduced water supply, intense weather events, localised flooding and Hertfordshire specific loss of habitat and species. The county council has since published the Sustainable Hertfordshire Strategy which outlines HCC’s nine ambitions as to how the authority will lead as an organisation and enable and inspire a sustainable county.</p> <p>The county council is very aware that action cannot be taken alone. In parallel to the work of HCC, all ten Hertfordshire authorities have unanimously agreed that a countywide approach to tackling climate change and ensuring sustainable development principles are at the forefront of the growth agenda. The Hertfordshire Climate Change and Sustainability Partnership was created in early 2020, which consists of all LPAs and the Local Enterprise Partnership (LEP). Four priority areas for action were identified which are Water, Carbon, Biodiversity and Transport. The county council has an officer working group to support the partnership and four subgroups to undertake the work on each theme. The primary purpose of the four subgroups is to prepare action plans for each of the priority areas and these action plans will cover which are resilience, mitigation and adaptation. Planning has a significant role to play in the development and implementation of suitable policies and this too will be reflected in action plans.</p> <p>The following national and international policies, plans and initiatives should also be considered:</p> <ul style="list-style-type: none"> • The government’s 25 Year Environment Plan; • Paris Agreement 2015; • SDGs – recognising that improving health, education, reducing inequality, and spurring economic growth go hand in hand with tackling climate change. <p>The co-benefits of the proposed natural climate solutions highlighted in the plan should be considered; for example, how planting trees not only captures carbon but also absorbs pollutant gases, prevents flooding, improves soil quality, improves the health of residents etc.</p> <p><u>Adapting to climate change</u></p> <p><u>2) The built and natural environment needs to be able to adapt to climate change. This requires the careful design of buildings, public realm, infrastructure and ecological services. Development proposals will be required to include a written adaptation strategy and clear design drawings to demonstrate (a) risk assessment of climate change impacts to the proposed development and the surrounding context (b) a masterplan indicating where protective and adaptive measures are to be taken, for example through layout, massing, public realm, green and blue infrastructure. (c) more detailed information at the building design level, for example massing, facades, materials, finishes, ground floor uses and design, minimising single aspect dwellings (d) building services measures (a reliance on powered cooling without appropriate design measures will not generally be acceptable).</u></p>	<ul style="list-style-type: none"> • Adapting to Climate change- new wording suggested • Sustainable design and construction-It is considered that the section Sustainable design and construction in the policy is a prescriptive approach with an emphasis on current legislation (which will be changed during the lifetime of the plan) and current priorities. It is suggested some changes for an outcome focused policy 	Agreed.	<p><u>Adapting to climate change</u></p> <p><u>2) The built and natural environment needs to be able to adapt to climate change. This requires the careful design of buildings, public realm, infrastructure and ecological services. Development proposals will be required to include a written adaptation strategy and clear design drawings to demonstrate (a) risk assessment of climate change impacts to the proposed development and the surrounding context (b) a masterplan indicating where protective and adaptive measures are to be taken, for example through layout, massing, public realm, green and blue infrastructure. (c) more detailed information at the building design level, for example massing, facades, materials, finishes, ground floor uses and design, minimising single aspect dwellings (d) building services measures (a reliance on powered cooling without appropriate design measures will not generally be acceptable).</u></p> <p><u>Suggested wording for policy “Sustainable Design and Construction</u></p> <p><u>3) All major developments will be required to submit a Sustainability Statement. This should show how the development is be designed and will be constructed to: a) Make efficient use of materials and minerals and minimising waste b) Take a Fabric First approach to reduce energy requirements and carbon emissions c) Embody circular economy principles to reduce the need for virgin materials d) Balance demolition and excavation with fill and onsite construction e) Conserve top soil for future use either on or offsite, f) Minimise water use in construction and operation, g) Manage water courses, surface and drainage water to avoid flood risk on and</u></p>

			<p>It is considered that the section Sustainable design and construction in the policy is a prescriptive approach with an emphasis on current legislation (which will be changed during the lifetime of the plan) and current priorities. It is suggested some changes for an outcome focused policy below:</p> <p><u>"Sustainable Design and Construction</u></p> <p><u>3) All major developments will be required to submit a Sustainability Statement. This should show how the development is be designed and will be constructed to: a) Make efficient use of materials and minerals and minimising waste b) Take a Fabric First approach to reduce energy requirements and carbon emissions c) Embody circular economy principles to reduce the need for virgin materials d) Balance demolition and excavation with fill and onsite construction e) Conserve top soil for future use either on or offsite, f) Minimise water use in construction and operation, g) Manage water courses, surface and drainage water to avoid flood risk on and offsite h) Provide at least 10% of biodiversity net gain, following the biodiversity hierarchy (avoid damage, minimise damage, on site BNG, local offset BNG) i) Be flexible and adaptable to the needs of future occupiers 4) Major developments will be expected to treat regulatory standards as a minimum target."</u></p>			<p><u>offsite h) Provide at least 10% of biodiversity net gain, following the biodiversity hierarchy (avoid damage, minimise damage, on site BNG, local offset BNG) i) Be flexible and adaptable to the needs of future occupiers 4) Major developments will be expected to treat regulatory standards as a minimum target."</u></p>
SC_00 020_C horley wood Parish Council	Chorleywood Parish Council	No	<p>TRDC declared a Climate Emergency in May 2019 and have stated in this document they will 'continue to tackle climate change and reduce the impacts on the environment by encouraging reductions in carbon emissions, waste, pollution, energy and water consumption and promoting the use of renewable energy and sustainable building materials'. However, Policy 13 fails to meet this declaration. Only major developments have to submit a Sustainability Statement but any development should be required to demonstrate 'how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime'. The Policy specifies that any development must demonstrate the management of the impacts of climate change and greater resilience to extreme weather events but contains no targets or minimum requirements. In addition, any development design and construction has to make efficient use of mineral resources and incorporate a proportion of recycled materials but apart from water there are no targets or minimum requirements specified. The Policy makes reference to 'the Building and Research Establishment Environmental Assessment Method (BREEAM) that provides market recognition for low environmental impact non-residential buildings' and specifies that major non-residential development proposals to aim to achieve BREEAM 'Excellent' Standard'. However, no standard is defined for residential development, and this is considered a material omission.</p>	<ul style="list-style-type: none"> Policy fails to meet the declaration Sustainability Statement should be required for all development to demonstrate 'how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime'. The Policy specifies that any development must demonstrate the management of the impacts of climate change and greater resilience to extreme weather events but contains no targets or minimum requirements apart from water; No standard specified for residential development and that is a material omission. 	<ul style="list-style-type: none"> Noted. It is considered that sustainability statement on smaller schemes would be far too onerous and may lead to schemes being unviable. A number of targets and minimum requirements are addressed by other policies in the Plan including water and bio-diversity etc. The policy is broadly-placed to address diverse issues relating to climate change. Revised policy addresses some of the concerns raised. BREAM can only be applied to non-residential development. 	Draft policy to be strengthened.

Q14. Should we have considered alternative options?						
SC_00 017_C halfont St Peter Parish Council	Chalfont St Peter Parish Council		<p>The M25 and HS2 are highlighted as sources of noise, pollution and light pollution. The large number of homes being suggested for these areas will add to this blight with the additional cars on the lanes and surrounding roads. Page 19 – 9 states "Air pollutants (including dust and odour) have been shown to have an adverse effect on both health and the environment and it will be important to consider emissions arising from development including indirect emissions such as those attributable to associated traffic generation"</p> <p>Residents on these sites would already be dealing with pollutants from the M25 and HS2 which your SA acknowledges to be an issue and risk.</p>	<ul style="list-style-type: none"> Large number of homes will add to noise, pollution and light pollution from the M25 	Draft policies in the Local Plan set out the requirements in relation to pollution (air, noise, light etc.) that development proposals will have to consider	No action
				<ul style="list-style-type: none"> 		
				<ul style="list-style-type: none"> 		

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

REPRESENTATION REFERENCE	REPRESENTOR	YES/ NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Q14. Do you think the Preferred Policy Option Adapting to Climate Change and Sustainable Construction is the right approach?						
P1_00 002_N Lucey		Yes	Design guidance as set out does not enhance use of daylighting and sun lighting. Needs greater clarity and enhanced documentation.	<ul style="list-style-type: none"> Design guidance needs to set out enhanced use of daylighting/ sunlighting 	Noted	None
P1_00 003_S Cassidy		Yes	N/A	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 005_T Foulkes		No	New developments should also plan on using non-gas and non-oil heating. Ideally they should use heat pumps or district heating. Also every parking place should be equipped with facilities to charge an electric vehicle.	<ul style="list-style-type: none"> New developments should use heat pumps and/ or district heating 	Noted	None
P1_00 006_J Humphrey		Yes	Environmental importance	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 014_A Samson		Yes	Makes logical sense. It will be interesting to see if this is adhered to in future decision making as past record does not inspire confidence.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 017_M McGuirk		No	You are doing such a god job in Carpenders park so I can't really take your proposals seriously	<ul style="list-style-type: none"> Have no faith in policy given poor development of Carpenders Park 	Noted	None
P1_00 019_G Houghton		Yes		<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00 020_T Grewal			Also include water saving and reuse requirements.	<ul style="list-style-type: none"> Include Water Saving measures 	Noted	None
P1_00 021_R Pawa		Yes	Does not go far enough There is no infrastructure for electric cars it is woefully lacking	<ul style="list-style-type: none"> Does not go far enough and no infrastructure for electric cars. 	Noted	None
P1_00 023_D r K Macleod		Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 024_C Holmes		Yes	Yes definitely. Consideration given to sustainable drainage systems is a priority as the area in which we live is prone to flooding. We also have a moral responsibility to protect our environment.	<ul style="list-style-type: none"> Agree with approach especially in relation to SUD's 	Noted	None
P1_00 025_M Beaujeux		No	Plan isn't avoiding flood risk	<ul style="list-style-type: none"> Does not avoid flood risk areas 	Where any development proposal is located with a Flood Risk Area, a Strategic Flood Risk Assessment would need to accompany any planning application to ensure that the development proposal does not worsen flood risk.	None
P1_00 026_P McCaffrey		Yes	Clear Policy	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 027_N Murtagh & C		Not Specified	All the words are there on climate change impact but the implications are not considered. Protection against overheating is not addressed. The wider impact of extreme weather events is not considered. While there is a need for improvements in construction of individual buildings, there is also a need for a holistic view of the challenges for the places within Three Rivers.	<ul style="list-style-type: none"> Other aspects such as implications of climate change, overheating, wider impact of weather events, 	Noted.	None

Gregor y				improvement in construction of buildings are not considered.		
P1_00028_J Pochettino		Yes	no knowledge of this but seems ok	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00032_T Smith		Yes	It's the right approach in respect of climate change	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00033_K Li		Yes	It considers the way new dwellings are created and their effects on the environment.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00034_M Richards		Yes	We all have responsibility to future generations	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00038_P Gibbs		Yes	Essential to avoid the loss of local chalk streams and to minimise climate change.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00040_N Brew		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"> No development of Green Belt or Greenfield. 	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".	None
P1_00041_D James-Saunders		Yes	Makes sense	<ul style="list-style-type: none"> Support 	Noted	None
P1_00046_S Singer		Yes	Climate change is maximum importance	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00047_P Rees		Yes	The policy is correct. (However, the policy's stated desire to ensure the 'Protecting of the natural environment, and conserving and enhancing biodiversity' is massively undermined by the Draft Local Plan's wrong-headed desire to build hundreds of new homes on green field sites and in Green Belt areas.)	<ul style="list-style-type: none"> Agree with approach, but section on 'Protecting the Natural Environment is undermined by Plan to build housing on Green Belt Land 	Noted	None
P1_00048_R Symmons		Yes		<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00049_S Haralambou		Yes	BREEAM Standard for non-residential is an excellent way forward.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00053_C Anderson Bergdahl		No	How come developments of flower house is suggested as this is against this policy with local flood risks and pollution from the M25	<ul style="list-style-type: none"> Development of Flower House would go against this policy with Local Flood Risk and pollution from M25 	Noted	None
P1_00054_A		Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None

Wrangl es						
P1_00 055_B Pegg		Yes	Important for the future	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 058_K Huisa men		Not Specifi ed	Global warming is greatly attributed to development of green space as the emitted temperature of developed space is higher than green space. By removing green space, not only do you remove the ability of the environment to absorb carbon, but also to provide our oxygen. Once these spaces are gone, you can't get them back.	<ul style="list-style-type: none"> Developing on Green space will lead to more Global Warming, Global Warming is attributed to loss of Green Space. 	Noted	None
P1_00 063_J Putcha		Yes	Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 064_B Patel		Yes	Agree with approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 066_R Franks		Yes	Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 068_A Clark		No	There is such a thing as "climate change" but it's debatable if the few random events often quoted are down to humans or any changes we enact will have much effect. Between 12 and 7,000 years ago - a mere blink of an eye in geological time- there was a mile of ice sitting over much of Great Britain - we had nothing to do with it forming or its subsequent melting - Three Rivers valley was created by the flood waters. The sea rose 150ft. Now THAT IS GLOBAL WARMING!	<ul style="list-style-type: none"> Debate whether Global Warming is a result of human activity 	Noted	None
P1_00 069_F Esma		No		<ul style="list-style-type: none"> Do not agree with approach but no comment 	Noted	None
P1_00 071_D King		Yes	I agree with this objective	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 074_I Mercer		Not stated	Again this does not cover conversions or demolish/ rebuilds, nor does it cover the whole of the 3 Rivers area e.g. for flooding and water usage. If this is not set out in the Local Plan, where is it set out?	<ul style="list-style-type: none"> Does not cover conversion/ rebuilds etc and does not cover whole of Three Rivers area 	Noted	None
P1_00 076_L Hull		Yes	This sounds sensible.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 078_A Prior		Yes	Yes these requirements are overdue.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 080_J Brooks -Martin		No	You talk about keeping the green belt and keeping the emissions low and then building houses in the same sentence, can't understand that	<ul style="list-style-type: none"> Section on 'Protecting the Natural Environment' is undermined by Plan to build housing on Green Belt Land 	Noted	None
P1_00 084_M Hampt on		Yes	To understand where it is building and areas on AONB or green belt land.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 088_C Green		Yes	Makes sense	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 089_S Pettifer		Yes	Natural sources and promoting Green infrastructure networking is good for all.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 091_B Cownle y		Yes	It's the goal of the modern world to fight climate change	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 094_L Farma n		No	We (Sarratt Parish Council) generally support this policy but ask for the following enhancements to be considered to make this policy effective: o We support the inclusion of sustainable flood management, but we are concerned that this is open to wide interpretation. So if there are any standards or frameworks that can be referenced, we believe that would help ensure the desired outcomes o We support the inclusion of water consumption targets. While the target is still too high, we note the limitations of scope of authority o We support the inclusion of BREEAM standard. We question the reason to limit application of this standard to major non-residential development and why to include a very broad escape clause unless this is demonstrated to be unviable. We urge that this very good requirement is revised and strengthened to cover all developments. If BREEAM is not deemed usable for smaller developments there are other appropriate standards which could be used to aid desired outcomes.	<ul style="list-style-type: none"> General agreement with approach Sustainable flood management is open to interpretation; Question reason to limit application of BREEAM standard to major non-residential development and why to include a very broad escape clause unless this is demonstrated to be unviable. Should cover all developments. 	Noted	None
P1_00 096_S		Yes	Seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None

Carpen ter						
P1_00 097_N Ross		Yes	Important to do all possible to reduce climate change.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 098_A Michae Is		No	This is non-empirical and easy to side step. There is no accountability nor enforcement. This only furthers the climate crisis and has no impact.	<ul style="list-style-type: none"> Policy has no accountability 	Noted	None
P1_00 099_A Michae Is (counci llor)		No	There are almost no targets in here- 'making efficient use' doesn't mean anything, we must specify with numbers. 'Incorporate measures to enhance biodiversity value' is useless- it cannot be enforced. It is incompetent that TRDC can't come up with tighter wording. The word 'unviable' should never be used.	<ul style="list-style-type: none"> No clear targets in the policy, must specify figures 	Noted	None
P1_00 102_K Allen		Yes	Sustainable construction is critical to reduce the impact on Climate Change.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 103_S Cartag ena		Yes	Yes but I'd like to see flood risk assessment taken seriously and assessed properly. We've already seen in the area a development being built and creating additional flood risk due to poor planning and lack of consideration on how increased urbanisation would impact the area	<ul style="list-style-type: none"> Agree with approach but Flood Risk assessments needs to be taken more seriously 	Noted	None
P1_00 107_R Webst er		Yes	All those aims are largely good, but you can't 'protect the natural environment, and conserve and enhance biodiversity' when you're at the same time planning to get rid of greenbelt. It's nonsense!!	<ul style="list-style-type: none"> Section on 'Protecting the Natural Environment' is undermined by Plan to build housing on Green Belt Land 	Noted	None
P1_00 108_J Cahill		Yes	You have no choice	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00 110_C PRE Herts		No	No. There are no targets identified by PPO13 and these should be set and made mandatory to achieve the required net zero targets as well as biodiversity enhancement. Specific guidance is likely to be needed and further detail is required with regard to the role of viability in influencing the meeting of targets. The same applies to the distinction between major and minor developments in paras 7.10 and 7.11.	<ul style="list-style-type: none"> No targets are identified in the policy 	Noted	None
P1_00 112_L Head		Yes	Essential	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 113_T Foley		No	This does not really sound like a crisis document. The chess will flood many times in the next few years. You need a crisis mentality, not a box ticking risk assessment.	<ul style="list-style-type: none"> Policy needs to be taken more seriously in the plan 	Noted	None
P1_00 114_D Twinbe rrow		No	no comment on improving existing residential and retail units carbon footprint - insulation, solar power, electric vehicle charging provision	<ul style="list-style-type: none"> No commentary on improving residential/ retail carbon footprint 	Noted	None
P1_00 115_B Thoms on		Yes	Resilience to climate change should be a requirement.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 116_P Newin g		Yes	I agree with the policy as stated.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 117_A Hamilt on		Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 119_J Lovear d		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"> No development of Green Belt or Greenfield. 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00 120_G Nunn		Yes	Clear need for these considerations to be integral to new developments with no 'get out ' clauses.	<ul style="list-style-type: none"> Agree with approach but need to ensure there are no 'get out' clauses 	Noted	None
P1_00 123_D		Yes	I think that you need to think about this a lot more - use of shading, better insulation, but also have plans in place to deal with extreme heat, severe windstorms etc. You say you have a declared a climate emergency - where is the evidence you are doing anything about it?	<ul style="list-style-type: none"> Need to think not only more into what methods to prevent climate change but 	Noted	None

Thoma s				the impacts such as dry weather and flooding		
P1_00 127_M Clarke	Yes	/.		• Agree with approach	Noted	None
P1_00 130_E Ad	Yes	The approach is what the times require		• Agree with approach	Noted	None
P1_00 131_P Harris	No	'Incorporate a proportion of recycled materials' too woolly. What proportion? The local water supplier must have an 'upper limit' on how much water they can supply into the future, particularly given our changing climate. NO new developments should go ahead unless they are within that limit. No specific mention of use of 'grey water' why not? Floating buildings / buildings on stilts where there is any risk of future flooding due to climate change.		• No new developments to go ahead as water supply must have upper limit.	Noted	None
P1_00 132_H Sahota	Yes	balanced approach is best		• Agree with approach	Noted	None
P1_00 135_W Stephe ns	No	Policy 1 only mentions major developments. All development, including extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated. A preference for developments with low embodied carbon should be stated which would discourage the overuse of materials such as concrete. The required Sustainability Statement submitted by applicants should also cover associated landscaping works.		• All development, including extensions and alterations, should be included within the policy; • Preference for developments with low embodied carbon should be included.	Noted	None
P1_00 137_S Hall	Yes	As we are all becoming more aware climate change and sustainable construction are here to stay but running alongside this is maintaining and sustaining the unique characters of Chorleywood and its attractiveness.		• Agree with approach. Maintain attractiveness and character of Chorleywood.	Noted	None
P1_00 140_M Mavadi a	No	Area ACFS13b already has existing flooding issues. So this particular policy option cannot be addressed if existing flooding caused by a build-up of waste etc has not been addressed.		• Area ACFS13b has flood issues. Cannot proceed if existing flooding but waste build up is not addressed.	Noted – See Part 2 Responses for further details.	None
P1_00 142_Y Lloyd	No	.		• Do not agree with approach but no reason given	Noted	None
P1_00 144_D Thorpe	Yes	Climate is changing		• Agree with approach	Noted	None
P1_00 147_N Hoad	No	It need to be far more targeted and specific to delivering positive energy buildings		• Agree with approach but needs to be targeted to delivering positive energy buildings.	Noted	None
P1_00 148_S Dilwort h	Yes	It is obvious		• Agree with approach	Noted	None
P1_00 150_G Ansell	No	No, I do not agree with the approach. There are no targets identified by PPO13 and these should be set and made mandatory to achieve the required net zero targets as well as biodiversity enhancement.		• Do not agree with approach. No targets identified and make mandatory to achieve net zero targets.	Noted	None
P1_00 151_A Peat	Yes	We are at crisis point with regard to climate change.		• Agree with approach	Noted	None
P1_00 155_C Sears	Yes	It is good to include future proofing. Similar to my answer to the last question could go further by thinking about how the animals, birds, plants will also use the new environment - e.g. having gaps in fencing for the hedgehogs to use or planting hedges as part of the landscaping, installation of water butts for collection of rain water to use for watering garden, installation of swift/house martin/swallow nesting boxes, the lack of eaves on new housing has meant a lack of nesting sites Basically thinking about how we can encourage nature when designing new homes		• Agree with approach. Could go further with thinking about how wildlife and plants will use new environment.	Noted	None
P1_00 157_A Ansell	No	There needs to be targets identified by PPO13. These should be made mandatory to achieve the net zero targets required, as well as biodiversity improvement		• Need targets identified by this option and make it mandatory.	Noted	None
P1_00 162_E Foulke s	Yes	Protection of the environment and consideration of sunlight levels and heat are increasingly important		• Agree with approach	Noted	None
P1_00 163_J Dickins	Yes	For the reasons you give		• Agree with approach	Noted	None
P1_00 164_S Morrill	Yes	This is the way society needs to progress		• Agree with approach	Noted	None
P1_00 166_T Turner	No	Need to stop building so many houses on green belt land to minimise risk of flooding not put flood managements in place. They are there naturally!!!		• Do not develop on Green Belt Land	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of	None

					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".	
P1_00 167_J Passin gham		Not Stated	I see nothing in here about actions to reduce flood risk (for example the River Colne has not been dredged for many years, the roads are not being swept properly on the Uxbridge Road leading to blocked drains and so on.) I find this section to be very sparse and unambitious. If TRDC wants to claim that it is addressing climate change then it needs to be far far more ambitious in this section. As just one example, what about trying to reduce food miles by promoting local farms to sell directly? (Wood oaks and Lynsters farm). Point 7.38/page 56– water stress. Given this known issue, I find the site choices in this plan astonishing. Point 7.39/page 56 – sewerage overload. Given this known issue, in Maple Cross I find the site choices in this plan astonishing.	<ul style="list-style-type: none"> No info about actions reducing flood risk; Very sparse and unambitious; Roads are not swept and lead to blocked drains (such as Uxbridge); Given known water stress/ sewerage overload issues in Maple cross and other areas, find choice astonishing. 	Noted	None
P1_00 169_M Drum mond		Yes	I think this is the right approach however perhaps rather than protecting the natural environment it should be a requisite to enhance the natural environment	<ul style="list-style-type: none"> Agree with approach but should be enhancing natural environment not just protecting. 	Noted	None
P1_00 170_N Hutchi nson		No	Not Radical enough.	<ul style="list-style-type: none"> Not radical enough 	Noted	None
P1_00 174_E Nathan		No	I agree with the Policy in principal, but: 1. A Sustainability Statement should be required for ALL new developments (not just major ones) and should cover associated landscaping works with an emphasis on using materials with low embodied carbon. 2. It would be good to specify here that developers must design sites with an assumption of a minimum 2 degrees global temperature increase.	<ul style="list-style-type: none"> Agree in principle. A sustainability statement is required of all development and specify that developers 	Noted	None
P1_00 181_C hiltern Societ y		Not Specifi ed	The Society supports the preferred Policy Option both in relation to addressing climate change and biodiversity loss. The policy should also include a reference to conserving and enhancing the landscape of the District, and particularly the part that is located within the Chilterns AONB and its setting.	<ul style="list-style-type: none"> Support the policy. Should also include a reference to conserving and enhancing landscape of the district located within the Chiltern AONB and its setting. 	Noted	None
P1_00 182_M Jones		No	Point 2 will not ensure that this happens. 'Should' will be ignored by developers who generally build to the lowest and cheapest options unless compelled to do otherwise. I realise that TRDC do not set Building Control regulations but why aren't new homes or large conversions mandated to use grey water for flushing and other non-drinking uses? Some homes in Rickmansworth have been 'converted' into 5 bedrooms all having their own en-suite!	<ul style="list-style-type: none"> 'Should' will be ignored by developers who will build lowest/ cheapest option; Developers should be mandated to use grey water for non-drinking uses 	Noted	None
P1_00 183_M Allum		Yes	as above but, some roads such as South Way & Bedmond Road flood in times of heavy rain, better drainage & better maintenance needed	<ul style="list-style-type: none"> Agree with approach, better drainage and maintenance needed, particularly South Way and Bedmond Road 	Noted	None
P1_00 184_M Mitchel I		No	All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated. There should be a preference for using low embodied carbon materials. Also, attention should be paid to the need to mitigate extreme weather, including excessive heat. Buildings should be designed to be kept cool by low carbon means such as shading and ventilation.	<ul style="list-style-type: none"> All development should be required to submit a Sustainability Assessment; Preference for low embodied carbon materials; Need to mitigate extreme weather including extreme heat. 	Noted	None
P1_00 186_J Parkhu rst		No	This development will have a significant impact on the environment	<ul style="list-style-type: none"> Development will impact the environment. 	Noted	None
P1_00 187_C Mitchel I		No	All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated.	<ul style="list-style-type: none"> All development should be required to submit a Sustainability Assessment; Preference for low embodied carbon materials; 	Noted	None

			There should be a preference for using low embodied carbon materials. Also, attention should be paid to the need to mitigate extreme weather, including excessive heat. Buildings should be designed to be kept cool by low carbon means such as shading and ventilation.	<ul style="list-style-type: none"> Need to mitigate extreme weather including extreme heat. 		
P1_00 189_M Rayme nt		No	Not sufficiently. The policy covers new development fairly well however low carbon building materials should be further encouraged and the Sustainability Statements submitted by applicants should cover associated landscaping works. Energy reduction measures must be required in the development of existing buildings.	<ul style="list-style-type: none"> Encourage Low carbon materials and Sustainability Statements submitted by applicants should cover associated landscaping works; Energy reduction for existing buildings. 	Noted	None
P1_00 190_I Starr		Yes	Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 191_J Shindl er		Yes	I agree with the above but see below	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 201_A Green		Yes	No building on flood plains	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 206_D Worrell		Yes	NA	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 209_G Bown		No	If you are serious about reducing the flood risk it would be more believable if you were not building on / concreting over green belt land which absorbs water and creates oxygen through the trees (that will be ripped up). Also building right up next to the overflow/floor reservoir on Oxhey Lane really show that this is not a series consideration of this plan. Carpenters Park is known to flood and reducing the available absorption capacity of the fields will only increase the risk to existing residents 'below' the green belt fields.	<ul style="list-style-type: none"> Concrete over green belt results in greater flood risk/ climate change; Building up next to the overflow/floor reservoir on Oxhey Lane really show that this is not a series consideration of this plan. 	Noted	None
P1_00 211_J Pumm ell		No	Policy 1 only mentions major developments. All development, including extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used. As there are many historic buildings in the district, a policy should be included encouraging the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.	<ul style="list-style-type: none"> All development should be required to submit a Sustainability Assessment; Preference for low embodied carbon materials; Need to mitigate extreme weather including extreme heat. 	Noted	None
P1_00 213_K Bright well		No	All I can see is gross over expansion of paperwork making more and more Mickey Mouse jobs at the cost of the resident - like energy performance certificates	<ul style="list-style-type: none"> Whole approach is irrelevant, such as energy performance certificates. 	Noted	None
P1_00 215_L Horne		No	We should be addressing climate change not adapting to it. The more you build the worse it gets.	<ul style="list-style-type: none"> Address climate change not adapt to it. More you build the worse it gets. 	Noted	None
P1_00 218_M Chabre l		Yes	Yes great ideas well done! But will it work? What is voluntary and what could / should be mandated?	<ul style="list-style-type: none"> Agree with approach. Should this not be mandated? 	Noted	None
P1_00 219_S Talbott		Yes	Appropriate	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 222_T hree Rivers Green Party		No	Policy 1 only mentions major developments. All development, including extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated. A preference for developments with low embodied carbon should be stated which would discourage the overuse of materials such as concrete. The required Sustainability Statement submitted by applicants should also cover associated landscaping works. As there are many historic buildings in the district, a policy should be included encouraging the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.	<ul style="list-style-type: none"> All developments should be subject to this policy, including extensions and alterations; Preference for developments with low embodied carbon should be stated; Sustainability Statement should also cover landscaping works; A policy should be included encouraging sensitive retrofitting of renewable energy to historic buildings whilst safeguarding the special characteristics of the buildings. 	Noted	None
P1_00 223_D Green		Yes	It covers the important issues.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 224_J Ford		Yes	climate change is a key issue	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 226_N Hutton		Yes	I think that it is high priority to protect the local environment and to ensure that new development is as environmentally friendly and conserving of energy as possible. The environment and its preservation of green space is of utmost priority and in the light of climate change is essential for our current and future well-being. We need to take action now.	<ul style="list-style-type: none"> Agree with approach 	Noted	None

P1_00 227_K Gallagher		No	The policy only mentions major developments. All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated. There should be a preference for using low embodied carbon materials. Also attention should be paid to the need to mitigate extreme weather, including excessive heat. Buildings should be designed to be kept cool by low carbon means such as shading and ventilation.	<ul style="list-style-type: none"> All developments should be subject to this policy, including extensions and alterations; 	Noted	None
P1_00 229_A Grant		No	<p>Climate Change emergency. TRDC have announced a Climate Change Emergency but what does this mean in real terms? If 80% plus of our districts' Green Belt gets destroyed by development, the damage to our environment will be irreversible and our precious chalk streams will have even more sewage flowing down them. This is not 'planning', this is environmental suicide. If we lose large portions of the natural world, human quality of life will be severely reduced and the lives of future generations will be threatened.</p> <p>Over the last 50 years, nature's capacity to support us has plummeted. In Three Rivers (as elsewhere) Air quality and water supply are reducing, soils are depleting and our crops are short of pollinators. Building houses on our farms and natural areas is so short sighted.</p> <p>Our lives will undoubtedly change, and not for the better. Yes, there will be more homes, but at what cost to nature and our existing communities and there is little chance my children will be able to afford these new homes with the average price in Croxley already around £500,000.</p> <p>What makes Three Rivers a district that people aspire to live and work in? In the past a major reason has been because of easy access to London, whilst offering a quality escape to a green and pleasant land. The Covid Pandemic, working from home and the need for millions of us to enjoy limited open space may have an impact on why people choose (or don't choose) Croxley Green in the future. Three Rivers is the archetypal Metropolitan Green Belt county. Should it be concreted over whatever the cost to the climate and existing residents' quality of life? No, and here are the main reasons why not.</p>	<ul style="list-style-type: none"> Green Belt gets destroyed by development damage to environment and chalk streams; Air quality and water supply have plummeted in past 50 years; Homes are not affordable; 	Noted	None
P1_00 232_A Britton		No	Developing a renewable energy project can be an expensive business, so policy can provide certainty and reduce risk will increase the likelihood of renewable energy projects coming forward. As part of its commitment to tackling the Climate Emergency, TRDC commits to "assess options for decentralised renewable energy generation within council operations and the wider district, working either independently or in partnership". More interrogation and explanation are needed as to what renewable energy developments would be acceptable and where (for example, solar farms and water power). The Council should be designating sites for renewable energy projects in the Local Plan.	<ul style="list-style-type: none"> More information needed as to what renewable energy developments would be acceptable and where (for example, solar farms and water power). Council should be designating sites for renewable energy projects in the Local Plan. 	Noted	None
P1_00 233_A Limerick		No	I disagree that Preferred Policy Option for Adapting to Climate Change and Sustainable Construction is the right approach. As you should be seeking to maintain and safeguard existing green spaces to help mitigate climate change and not just simple seek more efficient new developments. We have the ability now to help our local environment and building on greenbelt is not the way to avoid the impact of climate change.	<ul style="list-style-type: none"> Building on Green Belt Land does not avoid impacts of Climate Change 	Noted	None
P1_00 234_A O'Sullivan		No	I disagree that Preferred Policy Option for Adapting to Climate Change and Sustainable Construction is the right approach. As you should be seeking to maintain and safeguard existing green spaces to help mitigate climate change and not just simple seek more efficient new developments. We have the ability now to help our local environment and building on greenbelt is not the way to avoid the impact of climate change.	<ul style="list-style-type: none"> Building on Green Belt Land does not avoid impacts of Climate Change 	Noted	None
P1_00 235_C Maclea		Yes	Very Good	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 236_E Talbot		Yes	Stipulations make sense	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 240_K Butler		Yes	Yes ðŸ'ðŸ'»	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 244_P Phillips		No	Not enough specific focus on WATER SUPPLIES. S.W, Herts is in a potentially perilous situation - in terms of both water supply and sewage treatment.	<ul style="list-style-type: none"> Needs to be more focus on water supplies 	Noted	None
P1_00 250_I Jones		Yes	Local Plan Regulation 18 (Part 1) Preferred Policy Options Consultation June 2021 These representations are submitted by Iwan Jones, Managing Director of JIG Planning & Development Ltd, on behalf of the landowner of the land to the north of Chalfont Lane, Maple Cross (identified as site EOS12.3 within Part 2 of the Local Plan Regulation 18 Sites for Potential Allocation. The implications of reducing carbon emissions under Preferred Option Policy 12 would be enhanced if sustainable construction also became a pre-requisite of granting planning permission. The creation of adaptable buildings which are resilient to the effects of climate change and which also minimise the use of non-renewable natural resources should be encouraged and planning policy should be reflective of this requirement. Ensuring that development is constructed in the most sustainable way to reduce impacts on the environment also requires consideration for the inclusion of measures to reduce energy and water consumption, to reduce waste and to use sustainable building materials. We therefore endorse Preferred Policy Option 13 which seeks to ensure that "all major developments are	<ul style="list-style-type: none"> Agree with approach; The implications of reducing carbon emissions under Preferred Option Policy 12 would be enhanced if sustainable construction also became a pre-requisite of granting planning permission. 	Noted	None

			required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime". Mitigating and adapting to climate change should be intrinsic to the Local Plan and a key priority to the Council.			
P1_00 256_M Within gton		Yes	Seems reasonable	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 262_L Mead		Yes	Quantifiable standard such as passivhaus and CSH should be prescribed. Standard should be rigorously checked during and after construction. Unviability should not be an option.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 263_E Sutton		Yes	TRDC should also mention the role that nature and the natural environment can contribute more specifically. For example using existing trees or tree planting to provide shade and shelter from extreme weather. Avoidance of hard impermeable surfacing and retention of the natural surface of the land where possible to support surface drainage to deal with increased extreme rainfall events and storms, etc.	<ul style="list-style-type: none"> Agree with approach; Should also mention the role that nature and the natural environment can contribute more specifically 	Noted	None
P1_00 265_D Parry		Yes	This a must	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 266_C Westo n		Not Stated	This solely reflects new developments and sadly does not set out any strategies for the solving of problems that exist in the District already that will be further increased by climate changes. No dig organic farmland doesn't even get a mention why? It solves a local food problem, increases biodiversity, improves soils, traps heat in the soil during the day thereby reducing surrounding temperature, etc.	<ul style="list-style-type: none"> Only focuses on new developments and does not address existing issues in the area 	Noted	None
P1_00 267_D Lewis		No	These are all laudable measures as far as they go - in any alternative policy I would include them. However, the measures are rather weak. See for example, 'Be flexible and adaptable to the needs of future occupiers'. What on earth does this mean? It fails to cover fundamental measures e.g. that the construction should guarantee new houses a transformation to zero carbon and long-term sustainability, e.g. extensive use of ground-source heat pumps, solar panels, rainwater collection systems, etc.	<ul style="list-style-type: none"> Measures are somewhat weak; fails to cover fundamental measures e.g. that the construction should guarantee new houses a transformation to zero carbon and long-term sustainability 	Noted	None
P1_00 270_J Bishop		Not Stated	<p>Bearing in mind the Climate Emergency declared by the district council recently and the clear urgent need to reduce carbon emissions, the principle of sustainable transport should underpin all policies and site selections. As part of this, the real world potential for residents on new developments to walk, cycle or use public transport to safely access local facilities and services should be considered. As part of this consideration, the existence (or potential for providing) pavements, roads wide enough to allow vehicles & cyclists to safely co-exist and the topology of any walking / cycling route should be taken into account. For public transport, the timing, frequency, financial stability and realistic ability of expansion of the route should be considered.</p> <p>I do understand the need to put a new Local Plan in place and how difficult this is but, unless it is properly considered and it truly sustainable the plan will quickly fail to deliver.</p>	<ul style="list-style-type: none"> Principle of sustainable transport should underpin all policies; Real world potential for residents on new developments to walk, cycle or use public transport to safely access local facilities and services should be considered. 	Noted	None
P1_00 271_S Wallac e		Yes	Seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 275_R Kotech a		No	we needs green sustainable development without green space being lost	<ul style="list-style-type: none"> Need sustainable development without green spaces being lost 	Noted	
P1_00 276_L ondon Green Belt Council		No	<p>There is little consideration given to the climate emergency, in spite of the Local Authority claiming that "the Council has committed to use all practical means to reduce the impact of Council services on the environment, to cut carbon emissions and to reduce impacts on the environment". However, the LP has not properly considered the effect on the countryside of the loss of Green Belt (GB). Covering a large area of open countryside with housing is going to increase carbon emissions and not reduce them. The loss of important land that fulfils a role of carbon sequestration is also an important factor.</p> <p>London's GB has an important role to play in the future of the climate emergency in that it will absorb and retain water, provide lower temperatures when the urban area overheats, provide recreation opportunities, provide important fresh food production and give health and welfare benefits especially for those suffering mental illness. The importance of countryside close to urban areas has been particularly appreciated during the covid pandemic when many residents have taken advantage of countryside close to their homes and considerably increased their use of GB especially. None of these important "quality of life aspects" appears to have been considered in the overall strategy of this LP.</p> <p>The opportunity to take advantage of the countryside for the climate emergency is particularly relevant to the development planned for the Bedmond area. This land which is closest to the inner London, is to be sacrificed in order to achieve an over estimated housing figure, so denying both those living in the area and those who can more easily access it from London an opportunity order take advantage of the health and welfare beneficial effects.</p>	<ul style="list-style-type: none"> Little consideration of climate emergency; Development of Green Belt goes against principles of climate change; Regarding planned development for the Bedmond area, land which is closest to the inner London, is to be sacrificed in order to achieve an over estimated housing figure, so denying both those living in the area and those who can more easily access it from London an opportunity order take advantage of the health and welfare beneficial effects. 	Noted	None
P1_00 282_A		No	Enough. Too many questions not enough time before the deadline!!	<ul style="list-style-type: none"> No comment 	Noted	None

Jenkins						
P1_00283_Woodland Trust		Not Stated	Turning to Preferred Option 13 on Adapting to Climate Change, you could refer to the benefits of wood (grown from trees certified as managed sustainably) in being a sustainable construction material, which can be used in appropriate circumstances in place of other more carbon intensive materials such as plastic or concrete. You could also mention the proven role of trees in urban areas in providing shading to protect people from the sun and reduce urban temperatures and also the role of trees in prevention of surface water flooding by slowing the rate at which rainwater reaches the drainage system. It is good to see this policy in the plan but many of the benefits mentioned can be achieved by ensuring high levels of tree canopy cover.	<ul style="list-style-type: none"> • Could refer to benefits of wood in being a sustainable material; • Good to see the policy in the plan but more can be achieved; 	Noted	None
P1_00309_M Allum		No	<p>It is with utter dismay I read the Government plan for new housing in Three Rivers Area & that the Lib Dem Council have put forward open (Green Belt) land for proposed development. The amount of land required to meet Government requirements of 665 new homes every year going forward is simply not available in this area without causing huge environmental damage and loss of habitat for native species in addition to loss of outdoor recreational land for the existing local population. The reasons for being totally against further development in this area are numerous, I have summarised below as succinctly as possible a few of the main reasons why I do not agree with any of the plans for areas identified for new development.</p> <ul style="list-style-type: none"> • Carbon Emissions that the new builds would generate both during construction & once inhabited: The world is probably heading for 1.5C of heating early next decade, and temperatures will push onwards to 2C and above unless policies radically change. • Greenhouse gases are changing the environment of our planet in damaging and dangerous ways; new building in these areas will generate yet more Greenhouse gases. • There is only one planet and I want future generations to enjoy it, surviving wildlife of all kind to avoid extinction. • Recent Epic weather events – extreme heat/extreme drought /extreme flooding due to torrential rain are all related to Climate Change therefore it is more important than ever we protect our Green Spaces • Building more housing will destroy these open spaces that even though intensively farmed these spaces are habitats for wildlife such as birds – e.g. Skylarks & migrating birds, Butterflies & invertebrates, mammals – badger, fox, deer 	<ul style="list-style-type: none"> • Housing target is too high; • Will have an unacceptable impact on the local environment. 	Noted. Aim of the policy is to minimise the impact of development on the environment.	None
P1_00311_R Krystof iak		No	<p>The government's proposal to build such an excessive amount of houses is unsustainable and critically damaging to our environment. Our once green and pleasant land is being covered in concrete at an exponential rate. Additional houses need supporting infrastructure and therefore yet more concrete for power/gas, fresh water/waste water plants, rubbish disposal, additional hospitals, schools, roads etc. With all this additional concrete less water will percolate into the ground and therefore increase the potential for flooding.</p> <p>This will be the final nail in the coffin for wildlife and nature's way of absorbing CO2.</p>	<ul style="list-style-type: none"> • Housing targets are too high and will have an unacceptable impact on the environment. 	Noted. Aim of the policy is to minimise the impact of development on the environment.	None
Q14. Should we have considered alternative options?						
P1_00002_N Lucey			Section 2(d). Standards exist but are not adhered to. Needs to be more rigorous.	<ul style="list-style-type: none"> • Needs to be more rigorous 	Noted	None
P1_00005_T Foulkes		Yes	See Comments Above	<ul style="list-style-type: none"> • New developments should use heat pumps and/ or district heating 	Noted	None
P1_00014_A Samsom		Yes	As above and before.	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00017_M McGuirk		Yes	I would like to see specifics regarding biodiversity and flood management	<ul style="list-style-type: none"> • See specifics regarding biodiversity and flood management. 	Noted	None
P1_00019_G Houghton		Yes		<ul style="list-style-type: none"> • No alternatives suggested 	Noted	None
P1_00020_T Grewal		Yes	Also include water saving and reuse requirements.	<ul style="list-style-type: none"> • Include water saving and reuse requirements 	Noted	None
P1_00025_M Beaujeux		No	Yes not on green belt land.	<ul style="list-style-type: none"> • No development of Green Belt or Greenfield. 	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	None

					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_00 033_K Li		Yes	Can the options on new dwellings be further improved with new building technology, providing new dwellings to be even more friendly to the climate and the environment?	<ul style="list-style-type: none"> Options on new dwellings need to be improved with new building technology. 	Noted	None
P1_00 040_N Brew		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"> No development of Green Belt or Greenfield. 	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".	None
P1_00 053_C Anders on Bergda hl		Yes	Above	<ul style="list-style-type: none"> Development of Flower House would go against this policy with Local Flood Risk and pollution from M25 	Noted	None
P1_00 055_B Pegg		Yes	Opposing over building of new homes will also reduce emissions	<ul style="list-style-type: none"> Over building of new homes will not reduce emissions. 	Noted	None
P1_00 068_A Clark		Yes	Obviously some of the items listed such as not allowing building on flood plains is common sense - but the Council has had a history of ignoring such good sense - I can't see that changing!	<ul style="list-style-type: none"> Some items listed not allowing building on flood plains, but council has a history of ignoring common sense. 	Noted	None
P1_00 076_L Hull		Yes	Looking at the newest methods for building properties that are naturally air conditioned, perhaps building part into the ground to insulate against extreme temperatures.	<ul style="list-style-type: none"> Need to build part into the ground to insulate against extreme temperatures. 	Noted	None
P1_00 078_A Prior		Yes	Transports needs and reducing emissions.	<ul style="list-style-type: none"> Address transport needs and reduce emissions. 	Noted	None
P1_00 080_J Brooks -Martin		Yes	Do not build more houses	<ul style="list-style-type: none"> No more housing development 	Noted	None
P1_00 098_A Michae ls		Yes	Consult with an expert on climate change and sustainability, what has been written is useless. Invest the money in getting actual factual advice on how to write this as this will have no impact.	<ul style="list-style-type: none"> Consult with an expert on climate change/ sustainability. Invest in factual advice. 	Noted	None
P1_00 099_A Michae ls		Yes	Consult with an expert on climate change and sustainability, whoever wrote this in house obviously isn't one.	<ul style="list-style-type: none"> Consult with an expert on climate change/ sustainability. 	Noted	None

(councilor)						
P1_00103_SCartagena		Yes	More flood risk assessment	<ul style="list-style-type: none"> Need more flood risk assessments. 	Noted	None
P1_00107_RWebster		Yes	Yes, mitigate for climate change, but get rid of the idea you can have your green cake and eat it. You need to keep the greenbelt, or there will be no biodiversity to enhance!	<ul style="list-style-type: none"> Need to keep Green Belt otherwise no biodiversity to enhance. 	Noted	None
P1_00113_TFoley		Yes	No idea	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00114_DTwinberrrow		Yes	See Above Comment	<ul style="list-style-type: none"> No commentary on improving residential/ retail carbon footprint 	Noted	None
P1_00119_JLoveard		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"> Is a sanctuary for wildlife. 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00131_PHarris		Yes	See above	<ul style="list-style-type: none"> No new developments to go ahead as water supply must have upper limit. 	Noted	None
P1_00132_HSahota		Yes	get/borrow expert advise	<ul style="list-style-type: none"> Consult with an expert on climate change/ sustainability. 	Noted	None
P1_00135_WStephens		Yes	As there are many historic buildings in the district, a policy should be included encouraging the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.	<ul style="list-style-type: none"> A policy should be included encouraging sensitive retrofitting of renewable energy to historic buildings whilst safeguarding the special characteristics of the buildings. 	Noted	None
P1_00137_SHall		Yes	For these important factors to be viable within the area of Chorleywood, its infrastructure needs to be considered before any of the above are implemented.	<ul style="list-style-type: none"> Infrastructure in Chorleywood needs to be considered before any of above implemented. 	Noted	None
P1_00142_YLloyd		Yes	.	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00144_DThorpe		Yes	Communal energy schemes are coming. See Hebrides Island and forthcoming Government, or at least majority of all MP proposals. Provision for local energy generation and sharing	<ul style="list-style-type: none"> Need provision for communal/ local energy generation and sharing. 	Noted	None
P1_00147_NHoad		Yes	Council needs to adopt great use of solar to support local grids	<ul style="list-style-type: none"> Council needs to adopt greater use to support local grids. 	Noted	None
P1_00155_CSears		Yes	See above, not alternatives exactly, more additions	<ul style="list-style-type: none"> Agree with approach. Could go further with thinking about how wildlife and plants will use new environment. 	Noted	None
P1_00166_TTurner		Yes	Don't build on green belt	<ul style="list-style-type: none"> No development of Green Belt or Greenfield. 	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	None

					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_00 170_N Hutchinson		Yes	In this section the plan states that "Household water consumption in the District is significantly higher than in the rest of Hertfordshire or nationally", yet there is no inclusion of Integrated Rain Water storage as a feature of new homes, for use when flushing toilets and watering plants, which should have been part of this policy section, as it would reduce treated water consumption and consequently the energy required to produce it.	<ul style="list-style-type: none"> No inclination of Integrated Rain Water storage for new homes given in a water stress area. 	Noted	None
P1_00 191_J Shindler		Yes	It is farcical to mandate limiting water consumption to 110l pppd given the vast amount of water wasted on cooling HS2 drilling equipment. TRDC should represent its residents in pointing out this travesty.	<ul style="list-style-type: none"> Object to limiting water consumption given vast amount of water wasted on cooling HS2 drilling equipment. 	Noted	None
P1_00 209_G Bown		Yes	It is for councillors to consider sensible, alternative options and propose a range of those options	<ul style="list-style-type: none"> For councillors to consider alternative options. 	Noted	None
P1_00 215_L Horne		Yes	Look at reusing what we already have. Don't destroy more of our green spaces to create more havoc.	<ul style="list-style-type: none"> Reuse existing buildings/ brownfield land rather than develop Green Belt. 	Noted	None
P1_00 244_P Phillips		Yes	Any reference to housing development needs to be within a holistic approach with water / sewage as a crucially important consideration.	<ul style="list-style-type: none"> Housing development needs to be within a holistic approach with water / sewage. 	Noted	None
P1_00 256_M Within gton		Yes	Seems reasonable	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 256_M Within gton		Yes	Presumption towards allowing low carbon development. fines applied if these standards are not adhered to	<ul style="list-style-type: none"> Apply fines if development is not low carbon. 	Noted	None
P1_00 265_D Parry		Yes	I could not see an analysis of the increase in released carbon resulting from the entire construction supply chain in the document. It is not acceptable to build properties without reference to the impact both within TRD and globally.	<ul style="list-style-type: none"> No analysis in carbon footprint from construction supply chain. 	Noted	None
P1_00 267_D Lewis		Yes	See above. There seems to be no provision for transformation of houses over the next 50 years to become carbon zero. There is essentially no mention of solar panels in the policy document. And what about development of existing residential states to meet zero carbon standards? This would be what I call sustainable adaptation.	<ul style="list-style-type: none"> No reference to transformation of houses over next 50 years; No mention of solar panels; No reference to converting existing residential units to zero carbon. 	Noted	None
P1_00 275_R Kotecha		Yes	we needs green sustainable development without green space being post	<ul style="list-style-type: none"> No development of Green Belt or Greenfield. 	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".	None
P1_00 282_A Jenkins		Yes	See above.	<ul style="list-style-type: none"> No comment 	Noted	None

