

Appendix 4 - REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation

CARBON DIOXIDE EMISSIONS & ON-SITE RENEWABLE ENERGY

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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Q13. Do you think the Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach?						
SC_P1_00008_Home Builders Federation	Home Builders Federation		The Council will need to consider the necessity of this policy should the Government bring forward its proposed amendments to building regulations. The housebuilding industry, through the HBF, recognises that there is a need to improve the environmental performance of new residential development. However, rather than have a variety of standards in every local plan, the HBF, and our members, consider a national and standardised approach to improving such issues as the energy efficiency of buildings, the provision of renewable energy and the delivery of electric vehicle charging points to be the most effective approach that balances improvements with the continued delivery of housing and infrastructure. The HBF considers a universal standard is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. As such we would recommend that the policy is deleted.	<ul style="list-style-type: none"><li>• Council will need to consider the necessity of this policy should the government bring forward its proposed amendments. HBF and members prefer a nationalised standard approach.</li><li>• Policy should be deleted</li></ul>	NPPF and Building Regulations allow for a higher target. Anticipated changes to the Building Regulations will be accounted for in draft policy. 20% reduction to Pat L 2013 will be required until such a time building regulations are implemented.	Draft policy to reflect new 2021 Part L.  On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.  As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.
SC_00009_Sarratt Parish Council	Sarratt Parish Council	support s	We support this policy but strongly believe that this policy does not go far enough. With various future net zero targets, including TRDC goal for the District to achieve net-zero by 2045, and the County wide target set by Herts CC of net-zero by 2050, we strongly believe the policy target “20% less carbon dioxide emissions than Building Regulations Part L requirements (2013)” is inadequate and will not support achievement of any net zero targets. We believe the target should require for all new buildings to be zero carbon ready and have carbon dioxide emissions 75% lower than Building Regulations Part L requirements (2013) (in line with the proposed Future Homes Standard). With the knowledge and technology available today, along with the agreed net zero targets, it would be counterproductive for the District not to take this opportunity to set these kind of targets in this plan  •Policy Option 12 on Renewable Energy – New developments must produce 20% less CO2 emissions than directed in the 2013 regs. SPC is committed to creating a more sustainable environment and therefore welcomes this new and tangible measure, but would also prefer the target is raised to align with TRDC’s goal for the District to achieve net-zero by 2045 and the County wide target set by Herts CC of net-zero by 2050;	<ul style="list-style-type: none"><li>• Support the policy</li><li>• Doesn't think it goes far enough and that target should require for all new buildings to be zero carbon ready and have carbon dioxide emissions 75% lower than Building Regulations Part L requirements (2013) (in line with the proposed Future Homes Standard).</li></ul>	Support noted Noted. National policy and guidance does not allow us to seek higher carbon reductions than the 20% proposed in the draft policy at the moment. It is anticipated that the government will introduce a two-stage approach to implement the Future Homes Standard with the first due in June 2022 requiring a 31% uplift in energy efficiency requirements compared to the current standard (Part 2013) with the second due when the Future Homes Standard regulations come into force – anticipated in 2025- at which point development proposals would have to demonstrate 75-80 per cent lower than those built to current Building Regulations standards. Considering the government’s track record of setting out proposed changes to the Building Regulations and not doing so and the likelihood of the Future Homes standard being implemented during the first 5 years of the Local Plan a change to the draft policy is required to address both scenarios.	Draft policy to reflect new 2021 Part L.  On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.  As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	No	It is inadequate in the face of the challenges of climate change. TRDC should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out. Croxley Green Parish Council considers that all new build should be required to meet zero carbon targets. Adequate ventilation is required alongside energy efficiency. There is an existing and growing risk of older people and young children overheating in poorly designed and poorly ventilated homes.	<ul style="list-style-type: none"><li>• A higher standard should be set to face challenges of climate change.</li></ul>	Noted.	Draft policy to reflect new 2021 Part L.  On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.

						As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.
SC_00 024_A bbots Langley	Abbots Langley Parish Council	No	I believe we should be aiming higher, however I am aware that National Policy drives this. We are not beyond the realms of creating all new homes zero Carbon	<ul style="list-style-type: none"> <li>Understands that national policy drives the targets but suggests we aim higher.</li> </ul>	NPPF and Building Regulations allow for a higher target. Anticipated changes to the Building Regulations will be accounted for in draft policy. 20% reduction to Pat L 2013 will be required until such a time building regulations are implemented.	<p>Draft policy to reflect new 2021 Part L.</p> <p>On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.</p> <p>As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.</p>
SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure		<p>The county council does not agree with this policy wording as it currently stands. Building Regs part L is being reviewed and will likely be reviewed again during the lifetime of this local plan, and it is not the only Building Regs standard to affect energy efficiency.</p> <p>The Future Homes Standard is a set of standards that will complement the Building Regulations to ensure new homes are subject to higher energy standards. The standard will comprise a series of amendments to Part F (ventilation) and Part L (conservation of fuel and power) of the Building Regulations for new homes, and will be introduced in 2023. Further information can be found on the Government's website. Therefore, it is suggested that an approach requiring the submission of an Energy and Carbon strategy setting out how the building design, fabric and construction methods will reduce energy demand, the anticipated carbon dioxide emissions and the carbon emissions savings they achieve in excess of current building regulation requirements. Whilst local authorities are currently still permitted to set targets above building regulations, we note that this may not remain the case. We have not seen the evidence for a 20% saving over the current or new building regs, but if TRDC is confident that this is feasible and viable (especially given the future tightening of standards) then we have no objection to this target.</p> <p>It is to recommend that the policy could usefully require developers to publish their aspirations for in-use regulated energy performance using the metric kWh/m2/year (which is understandable to non-experts as it is directly comparable with domestic meter readings) to inform potential buyers and future buyers of the comparative cost of running the dwelling. This helps purchasers to directly consider energy performance as part of their purchasing choices. (Regulated energy covers space heating and cooling, hot water, ventilation, fans, pumps and lighting).</p>	<ul style="list-style-type: none"> <li>Object. The county council does not agree with this policy wording as it currently stands. Reference should be made to Part L building Regs and the Future Homes Standard.</li> <li>We have not seen the evidence for a 20% saving over the current or new building regs, but if TRDC is confident that this is feasible and viable (especially given the future tightening of standards) then we have no objection to this target.</li> </ul>	Agreed. TRDC will continue through DTC discussions our approach to zero carbon targets.	Draft policy to reflect new 2021 Part L.
SC_00 029_H ertsme re Borough Council	Hertsmere Borough Council		Preferred Policy Options 12 and 13 seek to reduce the carbon emissions of new development, which we welcome. However, the plan could perhaps be future-proofed through the inclusion of a more ambitious zero-carbon target for new development.	<ul style="list-style-type: none"> <li>Welcome the policy options to reduce carbon emissions</li> <li>Could perhaps future proof through the inclusion of more ambitious targets</li> </ul>	Noted. TRDC will continue through DTC discussions our approach to zero carbon targets.	Draft policy to reflect new 2021 Part L.
SC_00 020_C horley wood Parish Council	Chorleywood Parish Council	No	The Policy as stated is totally inadequate for 2021 and the next ten years and makes reference to the requirements set in 2013. Hertfordshire County Council have a published target of 50% reduction by 2030 and an aim to be carbon neutral by 2050. No reference is made about the need to heat homes by electricity, renewable sources like heat pumps or carbon neutral fuels such as hydrogen. Nor is there any policy covering the encouragement of walking and cycling over the use of cars. The provision of car charging points for each new home being created should be mandatory. The requirement for developers to produce an Energy Statement is to be applauded but leaving them to decide what 'combination of energy efficiency measures; incorporation of onsite low carbon and renewable technologies; connection to a local, decentralized, renewable or low carbon energy supply' is a missed opportunity	<ul style="list-style-type: none"> <li>The Policy is inadequate for 2021 and the next ten years and makes reference to the requirements set in 2013.</li> <li>Lacks reference to HCC targets and need to heat homes by electricity, renewable sources like heat pumps or carbon neutral fuels such as hydrogen.</li> <li>No policy encouragement of walking and cycling over the use of cars.</li> <li>Electric charging points should be mandatory.</li> <li>The requirement for developers to produce an Energy Statement is to be applauded but leaving them to decide what 'combination of energy efficiency measures; incorporation of onsite low carbon and renewable technologies; connection to a local, decentralized,</li> </ul>	<p>On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021. This requires higher standards to be achieved.</p> <ul style="list-style-type: none"> <li>Noted. This issues are addressed by other policies in the Plan</li> <li>Walking/cycling and EV charging points are covered elsewhere in the Plan</li> <li>Noted.</li> </ul>	Draft policy to reflect new 2021 Part L.

				renewable or low carbon energy supply' is a missed opportunity		
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<b>Q13. Should we have considered alternative options?</b>						
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**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
<b>Q13. Do you think the Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach?</b>						
P1_00 002_N Lucey			Reference to Building Regulations is fine but whole system is becoming unworkable. Is this plan future proofed as it is likely changes will be made.	<ul style="list-style-type: none"> <li>Is the plan future proof as it is likely will be changes</li> </ul>	Noted	None
P1_00 003_S Cassidy		Yes	N/A	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 005_T Foulkes		No	Please see my earlier comments on the use of non-gas and non-oil heating.	<ul style="list-style-type: none"> <li>Use non-gas and non-oil heating</li> </ul>	Noted	None
P1_00 006_J Humphrey		Yes	Environmental factors must always be considered	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 014_A Samson		Yes	It makes logical sense to do what we can to protect the environment.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 017_M McGuirk		No	Higher demands as the developers will negotiate these down and then perhaps you will reach your requirements	<ul style="list-style-type: none"> <li>Need higher demands as developers will negotiate them down then perhaps reach requirements.</li> </ul>	Noted	None
P1_00 019_G Houghton		Yes		<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 020_T Grewal		Yes	N/A	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 021_R Pawa		No	There is not enough emphasis on renewable energy for example all new houses and buildings could have solar panels are standard Also all new car parks housing developments you could mandate that they have recharging car points and lots of them	<ul style="list-style-type: none"> <li>Not enough emphasis on renewable energy for example all new housing could have solar panels as standard.</li> </ul>	Noted	None
P1_00 023_D r K Macleod		Yes	Ok	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 024_C Holmes		Yes	Incorporating energy efficient measures are definitely the way forward in helping protect the climate and environment.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 025_M		No	Disagree CO emissions will be kept a minimum	<ul style="list-style-type: none"> <li>CO2 emissions will not be kept to a minimum</li> </ul>	Noted	None

Beaujeux						
P1_00026_P McCaffrey		Yes	Policy clearly stated	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00027_N Murtagh & C Gregory		Not Specified	Adequate ventilation needs to be required alongside low energy-efficiency. See comments above on the existing and growing risk of overheating in homes.	<ul style="list-style-type: none"> <li>Need adequate ventilation alongside low energy efficiency</li> </ul>	Noted	None
P1_00028_J Pochettino		Yes	Don't know enough about this to comment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00032_T Smith		Yes	It's the right approach in respect to Climate Change	<ul style="list-style-type: none"> <li>Support</li> </ul>	Noted	None
P1_00033_K Li		No	I think all new residential development should not have any gas supplied to them, and use solar panels, as a minimum	<ul style="list-style-type: none"> <li>New residential development should not have gas supplied to properties.</li> </ul>	Noted	None
P1_00034_M Richards		Yes	No strong feelings	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00038_P Gibbs		Yes	Reduce the need for traffic and make homes as eco friendly as possible	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	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"> <li>Do not develop Green Belt Land</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00041_D James-Saunders		Yes	Of course, a complete no brainer	<ul style="list-style-type: none"> <li>Support</li> </ul>	Noted	None
P1_00043_P Rowbottom		yes	Shared energy & heating sources for all development. Deep-bore heat source pumps as standard	<ul style="list-style-type: none"> <li>Have shared energy and heating sources for all developments. Deep-bore heat source pumps for all.</li> </ul>	Noted	None
P1_00045_L Fitzpatrick		Yes	This is an excellent requirement	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00046_S Singer		Yes	Energy efficient measures are important to reduce climate change	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None

P1_00 047_P Rees		Yes	The policy is correct. (However, the proposal to build thousands of new homes will lead to greater pollution and more carbon emissions. That is an inconvenient truth. Thus, it is vital that Three Rivers District Council stands up to the Government and says it won't build to these overstated and ridiculous targets that are being imposed on local communities.)	<ul style="list-style-type: none"> <li>Agree with approach. Policy to build thousands more homes will lead to more pollution and carbon emissions. Housing targets are overestimated</li> </ul>	Noted	None
P1_00 048_R Symm ons		Yes	No Comment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 049_S Harala mbou		No	20% less is not high enough!	<ul style="list-style-type: none"> <li>20% less is not a high enough target</li> </ul>	Noted	None
P1_00 053_C Anders on Bergda hl		Yes	It's the right approach but no thoughts or plans for surrounding roads etc has been published as part of the plan (especially in regards to Toms Lane) which will result in huge amount of traffic and congestion.	<ul style="list-style-type: none"> <li>Agree with approach. No thoughts or plans for surrounding roads has been published, will result in huge traffic jams and regards to Toms Lane</li> </ul>	Noted	None
P1_00 054_A Wrangl es		Yes	No Comment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 055_B Pegg		Yes	A greener environment benefits all	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 056_D Luddin gton		Yes	Reflects the essential priority to address Climate Change at a local level.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 063_J Putcha		Yes	Agree	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 064_B Patel		No	New building development should meet a 60% target.	<ul style="list-style-type: none"> <li>New Buildings should meet 60% target</li> </ul>	Noted	None
P1_00 066_R Franks		No	Forget about the developments what about the extra 3000+ cars these will produce!!	<ul style="list-style-type: none"> <li>What about the extra 3,000+ cars</li> </ul>	Noted	None
P1_00 068_A Clark		No	It's utterly RIDICULOUS! You are proposing a Local Plan – it outlines massive construction and environmental upheaval - it will release untold amounts of carbon emissions far in excessive of any miniscule savings you can promote. Most so called "sustainable" energy merely pollutes somewhere else, hidden from view so don't waste you time and my Council Tax churning out this nonsense.	<ul style="list-style-type: none"> <li>Plan involves massive construction and environmental upheaval, will release untold amounts of carbon, sustainable energy just pollutes elsewhere.</li> </ul>	Noted	None
P1_00 069_F Esma		No		<ul style="list-style-type: none"> <li>Do not agree with approach but no reason given.</li> </ul>	Noted	None
P1_00 071_D King		Yes	I Agree with this objective.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 074_I Mercer			This does not cover conversions or demolish / rebuilds but surely it should. It can also include a clause that allows the 20% reduction to be increased in line with national planning policy.	<ul style="list-style-type: none"> <li>Plan does not cover conversions or rebuilds but should;</li> <li>Include a clause that 20% reduction be increased in line with national policy.</li> </ul>	Noted	None
P1_00 075_B Gibbs		No	Insufficient account is taken of the huge environment impact from the demolition is existing buildings, the CO2 emissions tied up in concrete construction. There is a climate emergency and we must act decisively and aggressively to limit its devastating effects on health, weather patterns, loss of species, etc, etc.	<ul style="list-style-type: none"> <li>No account of environment impact from demolition is existing buildings.</li> <li>Is a climate emergency and need to act more decisively and aggressively.</li> </ul>	Noted	None
P1_00 076_L Hull		No	The targets should be far more ambitious.	<ul style="list-style-type: none"> <li>Targets should be more ambitious.</li> </ul>	Noted	None
P1_00 077_G Lean		Yes	Y	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 078_A Prior		No	Carbon emissions reduction needs to be increased.	<ul style="list-style-type: none"> <li>Targets should be more ambitious.</li> </ul>	Noted	None
P1_00 080_J Brooks -Martin		Yes	More support is required in these difficult times	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 084_M		Yes	To keep the environment free of carbons and radical changes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None

Hampt on						
P1_00 094_L Farma n		No	We (Sarratt Parish Council) support the policy to reduce carbon dioxide emissions, but strongly believe that this policy does not go far enough. With various future net zero targets, including TRDC goal for the District to achieve net zero by 2045, and the County wide target set by Herts CC of net-zero by 2050, we strongly believe the policy target's less carbon dioxide emissions than Building Regulations Part L requirements (2013) is inadequate and will not support achievement of any net zero targets. We believe the target should require for all new buildings to be zero carbon ready and have carbon dioxide emissions 75% lower than Building Regulations Part L requirements (2013) (in line with the proposed Future Homes Standard). With the knowledge and technology available today, along with the agreed net zero targets, it would be counterproductive for the District not to take this opportunity to set these kind of targets in this plan.	<ul style="list-style-type: none"> <li>Agree with approach. Targets do not go far enough.</li> </ul>	Noted	None
P1_00 086_E Kirkma n		Yes	we all have to do our bit and this is vital	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 088_C Green		Yes	Makes sense	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 089_S Pettifer		Yes	Since the pandemic Covid 19 there has been a great reduction in carbon dioxide which has been beneficial to the environment and habitats alike, this must continue and not go back to pre Covid figures so any help to cut carbon emissions is a good step for future generations.	<ul style="list-style-type: none"> <li>Agree with approach. Must not go back to pre-covid figures of emissions.</li> </ul>	Noted	None
P1_00 091_B Cownle y		Yes	Fight Climate Change	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 096_S Carpen ter		Yes	Seems appropriate	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 097_N Ross		Yes	In line with targets to limit climate change.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 098_A Michae ls		No	This is not nearly enough - this is not in line with the Paris Agreement and does not reduce carbon emissions in any meaningful way. We should be beacon of hope and an example for other communities and there are ways to do this. Its sad that this has the least amount of text (thus attention). Green initiatives should be compulsory.	<ul style="list-style-type: none"> <li>Targets are not ambitious enough.</li> </ul>	Noted	None
P1_00 099_A Michae ls (counci llor)		No	TRDC should be going much further. Carbon neutral dwellings should be required in large developments and low carbon solutions to lighting and heating should be enforced to a much higher standard, around the 30-40% mark. Rain water recycling and other green initiatives should not be optional.	<ul style="list-style-type: none"> <li>Targets are not ambitious enough</li> </ul>	Noted	None
P1_00 102_K Allen		Yes	Reducing CO2 emissions is critical.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 103_S Cartag ena		No	Renewables should be a priority	<ul style="list-style-type: none"> <li>Renewables should be priority</li> </ul>	Noted	None
P1_00 107_R Webst er		No	20% improvement is a woefully low target. The design of any new properties should be researched in detail to maximise their comfort levels given climate change is already happening. For example having too much insulation, may result in properties become impossible to cool in summer.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 108_J Cahill		Yes	no idea	<ul style="list-style-type: none"> <li>No comment.</li> </ul>	Noted	None
P1_00 110_C PRE Herts		No	No. As recommended by the Committee for Climate Change (op cit), essential preparation for the Local Plan should be the production of net zero or climate action plans with delivery projects that prepare the District for attaining net zero carbon by 2050. This should be for all sectors across the District and not just local authority activity. Key areas to address are emissions from buildings, transport, waste, power and land use, including land use change and decisions on the scale, location and design of new development should be informed by these plans. This will require, for example, new homes to be built to net zero standards as soon as possible to avoid the need for retrofitting and there should be greater clarity in Chapter 7 on the need to reach net zero carbon and other issues as it relates to wider environmental issues.	<ul style="list-style-type: none"> <li>Essential preparation for the local plan should be the production of net zero or climate action plans;</li> <li>Address emissions from all sources.</li> <li>Buildings need to be net zero to avoid retro-fitting.</li> </ul>	Noted	None
P1_00 112_L Head		Yes	Good Idea	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 113_T Foley		Yes	No Reason	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None

P1_00 114_D Twinbe rrow		Yes	Concur	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 115_B Thoms on		No	The proposal is not ambitious enough.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 116_P Newin g		Yes	I agree with the policy as stated.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 117_A Hamilt on		Yes	No Comment	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	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"> <li>Land is sanctuary for wildlife</li> </ul>	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	A hopeful approach but likely to be costly and where is the extra funding to come from?	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 123_D Thoma s		Yes	ok but only applies to new build	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 127_M Clarke		Yes	No	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 130_E Ad		Yes	Renewable energy is always the right approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 131_P Harris		No	20%! Far too little. And no mention of carbon offset, where CO2 production is totally unavoidable?	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 132_H Sahota		Yes	balance approach for future	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 135_W Stephe ns		No	It is inadequate in the face of the challenges of Climate Change. The Council should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 140_M Mavadi a		No	By proposing homes on the Greenbelt and creating concrete jungles I do not see how any topic of CDE or renewable energy can be discussed. By closing in open areas the damage is already being put in place.	<ul style="list-style-type: none"> <li>Developing green belt land and open areas goes against this policy</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken	None

					into account when identifying which potential areas of Green Belt Land to release".	
P1_00 142_Y Lloyd		No	.	<ul style="list-style-type: none"> <li>Do not agree with approach</li> </ul>	Noted	None
P1_00 144_D Thorpe		Yes	But the target is too low	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 145_C Bessant			<p>If the Council are serious about tackling climate change, then <b>this policy option should be right at the top, number 3 at least, not hidden after everything else</b>, where it currently is, at <b>Preferred Policy Option Number 13</b>. In that way it sends out the <b>correct message</b> to planners and developers that <b>you are truly serious about climate change</b>, that <b>this is top of your agenda</b> and <b>not to be ignored!</b></p> <p>It is of the right approach but what is missing is:  <b>Planting of trees to mitigate the carbon release which will occur as a result of the building process ie concrete production.</b>  <b>Also, to help deflect high temperatures trees should be planted around most of the buildings.</b>  <b>Also, green roofs should be used when any flat rooves are suggested.</b></p> 	<ul style="list-style-type: none"> <li>Policy needs to be given more priority;</li> <li>Planting of trees to mitigate the carbon release which will occur as a result of the building process ie concrete production.</li> </ul>	Noted	None
P1_00 147_N Hoad		No	This does not go far enough and does not encourage the level of change we are committed to. The council should be looking to a standard of positive energy buildings. It is possible and at the right price you just have to push people	<ul style="list-style-type: none"> <li>Targets not ambitious enough</li> </ul>	Noted	None
P1_00 148_S Dilworth		Yes	Everyone should be involved in lowering the overall carbon footprint for humanities survival.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 150_G Ansell		No	No, this is not the right approach. As recommended by the Committee for Climate Change, essential preparation for the Local Plan should be the production of net zero or climate action plans with delivery projects that prepare the District for attaining net zero carbon by 2050. This should be for all sectors across the District and not just local authority activity. Key areas to address are emissions from buildings, transport, waste, power and land use, including land use change and decisions on the scale, location and design of new development should be informed by these plans. This will require, for example, new homes to be built to net zero standards as soon as possible to avoid the need for retrofitting and there should be greater clarity on the need to reach net zero carbon and other issues as it relates to wider environmental issues.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 151_A Peat		Yes	We are at crisis point with climate change. Everything to slow down climate change is good.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 155_C Sears		Yes	It is good to have this as a consideration	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 156_O xhey Hall		Not Specified	Any properties built from now onwards can be expected to still be in use in 2050 when it is planned that our society be 'carbon neutral' i.e. no longer emitting any carbon dioxide from the burning of fossil fuels. Retrofitting buildings with the appropriate technology will be far more difficult and expensive than building the technologies in from the planning stage. The phased approach by	<ul style="list-style-type: none"> <li>Need a policy that no development can take place unless it can be demonstrated that they could be carbon neutral</li> </ul>	Noted. Some of the issues raised have been addressed in the revised policy	None



Residents Association			central government towards meeting this final target is understandable for retrofitting existing properties but if this approach is still used for properties built now, then it will add to the number of properties which will have to be retrofitted in the future. Since the technologies exist for this to be a realistic target from now, it would be sensible for there to be a policy statement that no new build will gain approval if it cannot demonstrate that it is carbon neutral.			
P1_00157_A Ansell			The Committee for climate change has recommended that the production of net zero or climate action plans should be essential in preparing the Local Plan and this should be for all of the district, not just any local authority activity. Areas to address include emissions from buildings, transport, power and land use. The design of any new development should take these plans into consideration; for example new homes would be required to be built to net zero standards as soon as possible. There should also be greater clarity on why we need to reach net zero carbon and how it relates to wider environmental issues.	<ul style="list-style-type: none"> <li>Design of any new development should take these plans into consideration; for example new homes would be required to be built to net zero standards as soon as possible.</li> </ul>	Noted	None
P1_00162_E Foulkes		No	I think on street electric car charging points should be required in all new build houses as well as reduction of CO2 emissions	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00163_J Dickins		Yes	We need to cut the greenhouse gases urgently	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00164_S Morrill		Yes	I have lived all my life in pre WW2 houses which are difficult to insulate well; I have been involved in building new houses from scratch - so much easier to make them thermally efficient. Same goes for almost all buildings.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00166_T Turner		Yes	Should be more than 20%	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00167_J Passingham		Not Stated	As a resident living on the Uxbridge Road – who has written to my councillor Roger Seabourne on this topic several times with no satisfactory answer – I conclude that the Council intends to take no action to protect my health and reduce the pollution to which I am exposed. Nothing in this plan leads me to conclude otherwise.	<ul style="list-style-type: none"> <li>Council intends to do nothing to improve health of residents and reduce climate change impacts</li> </ul>	Noted	None
P1_00169_M Drummond		No	The target should be tougher. Although the global effect of CO2 from the world's largest emitters dwarfs anything we could ever affect at a local level - we should set the toughest standard that don't affect the delivery of a local plan	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00170_N Hutchinson		No	The UK government has officially adopted a 2050 target to reach net zero carbon emissions, therefore this should be the target for ALL new developments NOW. Unless you are admitting that new build housing will not last 30 years.	<ul style="list-style-type: none"> <li>Zero emissions should be the target for all new developments</li> </ul>	Noted	None
P1_00174_E Nathan		Yes	Strongly support the requirement for new developments to demonstrate lower carbon emissions. Ideally, this requirement would be strengthened continually as Government policy supports this, so that we have a chance of getting to net-zero. Just a note: in 7.1, where it references the Climate Change Act 2008, the legislation cited is actually out of date and needs amending: The Government committed to achieving net-zero emissions by 2050 in June 2019. Parliament passed legislation requiring the government to reduce the UK's net emissions of greenhouse gases by 100% relative to 1990 levels by 2050.	<ul style="list-style-type: none"> <li>Agree with approach. Target should be strengthened in line with government's net zero policy.</li> </ul>	Noted	None
P1_00181_C Hiltnor Society		Not Specified	We agree that the plan needs to take a positive approach to addressing climate change. We support changes to more sustainable technologies such as homes being required not to have conventional gas boilers and to have air/ground source heat pumps instead for electric heating. Also, provision needs to be made for electric car charging, both at private properties and at public locations.	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Should make provision for electric vehicle charging at private/ public properties</li> </ul>	Noted	None
P1_00182_M Jones		No	Climate change is such a threat that we need much higher targets for reducing emissions. Our area is already highly car dependent and new housing developments will push car ownership and usage much higher. There is no integrated plan to address this!	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00183_M Allum		Yes	As above	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00184_M Mitchell		No	It is inadequate in the face of the challenges of climate change. TRDC should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out. I feel very strongly that all new build should be required to meet zero carbon targets. Adequate ventilation is required alongside energy efficiency. There is an existing and growing risk of people overheating in poorly designed and poorly ventilated homes.	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> <li>All new developments should have zero carbon emission target.</li> </ul>	Noted	None
P1_00187_C Mitchell		No	It is inadequate in the face of the challenges of climate change. TRDC should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out. I feel very strongly that all new build should be required to meet zero carbon targets. Adequate ventilation is required alongside energy efficiency. There is an existing and growing risk of people overheating in poorly designed and poorly ventilated homes.	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> <li>All new developments should have zero carbon emission target.</li> </ul>	Noted	None
P1_00190_I Starr		Yes	Sensible	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None

P1_00 191_J Shindler		No	All new developments should be designed for a carbon neutral footprint, plus mandatory mitigation of solar gain to protect from likely future extreme summer heat crises	<ul style="list-style-type: none"> <li>All new developments should have zero carbon emission target;</li> <li>mandatory mitigation of solar gain to protect from future extreme summer heat crises</li> </ul>	Noted	None
P1_00 201_A Green		Yes	The council needs to do its bit to tackle emissions	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 206_D Worrell		Yes	NA	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 209_G Bown		No	How can you be reducing CO2 emissions in the area by proposing to increase the housing stock by c1,500 houses with the associated heating/power requirements and car journeys?	<ul style="list-style-type: none"> <li>Cannot reduce CO2 emissions with so much development</li> </ul>	Noted	None
P1_00 211_J Pummell		No	It is inadequate in the face of the challenges of Climate Change.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 215_L Horne		Yes	I do. But how do you believe you can achieve this when the message is that you will just keep building more buildings on greenfield sites which require cars and additional transportation.	<ul style="list-style-type: none"> <li>Agree with approach but query how target can be met with all of the development.</li> </ul>	Noted	None
P1_00 218_M Chabreil		No	No it is far too relaxed. We need to be installing new homes with zero-carbon capabilities and retro-fitting existing housing stock. The national targets for 2030 and 2050 will not be met with anything less radical if York can do it, so can other towns and cities in the UK. Admittedly this is partly a failure of national guidance, but we can be seen to be leaders on this locally. Lots of people will want to win these housing contracts in SW Hertfordshire, so we can demand the planetary best!	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> </ul>	Noted	None
P1_00 219_S Talbot		Yes	Appropriate	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 222_T hree Rivers Green Party		No	It is inadequate in the face of the challenges of Climate Change. The Council should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out. All new builds should meet achieve net zero carbon.	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> </ul>	Noted	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 223_D Green		No	20% less is not enough.	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> </ul>	Noted	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 224_J Ford		Yes	climate change is at the forefront	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 227_K Gallagher		No	It is TOTALLY INADEQUATE in the face of the challenges of climate change.	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> </ul>	Noted	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 232_A Britton		No	It is inadequate in the face of the challenges of Climate Crisis. The Council should set a much higher target for reducing carbon emissions than currently allowed under National Policy. All new builds should meet achieve net zero carbon.	<ul style="list-style-type: none"> <li>Target is not ambitious enough.</li> </ul>	Noted	None
P1_00 233_A Limerick		Yes	I agree Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 234_A O'Sullivan		Yes	I agree Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 235_C Maclean		Yes	vg	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 236_E Talbot		Yes	Stipulations make sense	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 240_K Butler		Yes	ðŸ’ŒðŸ’Œ»	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None

P1_00 244_P Phillips		No	Nothing on road transport as a major source of pollution / carbon emissions.	<ul style="list-style-type: none"> <li>Nothing on transport being major source of emissions.</li> </ul>	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. Minimising our contribution to climate change by continuing to reduce greenhouse gas emissions should be a key consideration for the new Local Plan. It is pleasing to note that in May 2019, the Council declared a climate emergency and is committed to use all practical means to cut carbon emission. To this effect, we support the Council's preferred policy approach which seeks for all new applications for residential development of one unit and above to be required to submit an Energy Statement demonstrating that development proposals will produce 20% less carbon dioxide emissions than Building Regulation Part L requirements (2013). We would also recommend that mechanisms are put in place whereby this preferred policy option is refreshed and updated to reflect any improvement in Building Regulations up to 2038 which is more than likely as building materials and techniques are continuously evolving and improving and made more efficient.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 254_Pl anning Bureau Ltd		Not Stated	<p>The Council's commitment to meeting both its, and the UK Government's target, of net zero carbon emissions by 2050 is commendable. Accordingly, there is a requirement for all new build residential development to produce 20% less carbon dioxide emissions than Building Regulations Part L requirements (2013).</p> <p>Government has recently finished consulting on interim changes in both Part F and Part L of the Building Standards through the second consultation on <i>The Future Buildings Standards</i> and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. At present it is expected that new homes built from 2022 will need to produce 31% less carbon emission than the current Building Regulations. Given the Government's clear commitment and incremental progress towards achieving net zero, the respondents challenge the wisdom of enhanced sustainability measures particularly when balanced against other local plan priorities – for example affordable housing.</p> <p>As referred to consistently throughout our representation, no Local Plan Viability Assessment has been published with the Regulation 18 consultation which in our view undermines the robustness of the consultation. It is unknown at the time of writing if the cost of providing enhanced carbon dioxide mission measures has been properly allowed for.</p> <p>We would respectfully remind the Council that the PPG states that “<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>” (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>We respectfully request that the additional costs associated with meeting the requirements of Preferred Policy Option 12 be allowed for in the forthcoming Local Plan Viability Assessment</p>	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Target should be more ambitious.</li> </ul>	Noted	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 256_M Within gton		Yes	Seems reasonable	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 261_G Cooper		Yes	But needs to be backed by the resource to assess whether this is met. Link to climate emergency and needs to be translated into real action.	<ul style="list-style-type: none"> <li>Needs to be backed up by resources.</li> </ul>	Noted	None
P1_00 262_L Mead		No	not ambitious enough. Quantifiable standard should be prescribed.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 264_M ple Cross and West Hyde RA		Not Stated	<p>The Government has confirmed plans to make new homes meet net zero by 2025 – your Policy does not conform to this standard. Since the current proposal is to build circa 10,000 dwellings, net zero for any new development must be compulsory from the start of this plan.</p> <p>(4) All non-residential and multi residential developments should achieve a minimum BREEAM Standard of ‘Excellent’ and aim to achieve ‘Outstanding’</p> <p>7.3 Ground source pumps are far more efficient than ambient air heat pumps in the UK climate. Therefore this should be the preferred option for larger developments that are not within GSPZ1.</p> <p>7.15 ..... major non-residential and multi residential development proposals to aim to achieve a minimum BREEAM Standard of Excellent.</p>	<ul style="list-style-type: none"> <li>Target is not ambitious enough;</li> <li>Some text changes suggested.</li> </ul>	Noted. BREEAM is covered by other policies in the Plan	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 265_D Parry		Yes	Reduced carbon use is a must	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 266_C Westo n		Not Stated	<p>The Government has confirmed plans to make new homes meet net zero by 2025 – your Policy does not conform to this standard. Since the current proposal is to build circa 10,000 dwellings, net zero for any new development must be compulsory from the start of this plan.</p> <p>(4) All non-residential and multi residential developments should achieve a minimum BREEAM Standard of ‘Excellent’ and aim to achieve ‘Outstanding’</p>	<ul style="list-style-type: none"> <li>Target is not ambitious enough;</li> <li>Some text changes suggested.</li> </ul>	Noted. BREEAM is covered by other policies in the Plan	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.

P1_00 267_D Lewis		No	You claim that the council has declared a climate emergency. This policy does not sound like an emergency - 20% carbon saving is nothing like enough. Why doesn't the council require all new homes to conform to the strictest regulations enforced in Scandinavia and Germany? Also, we also question whether you are adequately going to monitor and enforce any regulations - what accountability is there? Moreover, by 2038 you should be aiming for zero carbon homes, not 80% of the current emissions - why is there no timescale in this policy?	<ul style="list-style-type: none"> <li>Target is not ambitious enough;</li> <li>By 2038 should be aiming for net zero, not 80% target reduction</li> </ul>	Noted.	Draft policy to reflect new 2021 Part L that requires higher standards to be achieved.
P1_00 282_A Jenkins		No	Enough. Too many questions not enough time before the deadline!!	<ul style="list-style-type: none"> <li>No comment</li> </ul>	None	None
P1_00 293_J Bonner		No	We support the aspiration to help address climate change, but the draft Plan must ensure that development is deliverable. If there is a requirement to delivery 20% less carbon emissions than Building Regulations Part L, then this must be supported by evidence around viability and achievability. In the absence of this evidence we object to this policy as currently worded. We would like to explore this further with the benefit of the viability evidence. Please refer to cover letter.	<ul style="list-style-type: none"> <li>Whilst agree with approach, must ensure that development is deliverable and viable to achieve targets.</li> </ul>	Noted	None
<b>Q13. Should we have considered alternative options?</b>						
P1_00 005_T Foulkes		Yes	Heat pumps, district heating and charging for electric cars	<ul style="list-style-type: none"> <li>Need heat pumps, district heating and charging for electric cars.</li> </ul>	Noted	None
P1_00 014_A Samson		Yes	As above, before	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 017_M McGuirk		Yes	Mandatory requirements with no means of appeal	<ul style="list-style-type: none"> <li>Is a mandatory requirements with no means of appeal</li> </ul>	Noted	None
P1_00 020_T Grewal		Yes	Alongside the energy guidelines the council must ensure water usage, water recycling and ensuring that new developments harness and store rain water rather than let it flow out into drains. Must implement systems to reduce sewerage and other waste.	<ul style="list-style-type: none"> <li>Council must ensure water usage, water recycling and harness rain water than flowing into drains.</li> </ul>	Noted	None
P1_00 021_R Pawa		Yes	As above	<ul style="list-style-type: none"> <li>Not enough emphasis on renewable energy for example all new housing could have solar panels as standard.</li> </ul>	Noted	None
P1_00 033_K Li		Yes	Considering the council has declared a climate emergency, they should be looking at imposing the maximum energy efficiency measures in all new dwellings.	<ul style="list-style-type: none"> <li>Need to impose maximum energy efficiency standards</li> </ul>	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"> <li>Do not develop Green Belt Land</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 043_P Rowbottom		yes	Shared energy & heating sources for all development. Deep-bore heat source pumps as standard	<ul style="list-style-type: none"> <li>Shared energy and heating sources for all development, deep bore hole source as standard</li> </ul>	Noted	None
P1_00 045_L Fitzpatrick		Yes	This section would also do well to make transport provision a consideration in approving the density of new sites. Reducing permission for car parking should be a policy choice.	<ul style="list-style-type: none"> <li>Section would also do well to make transport provision a consideration in approving the density of new sites</li> </ul>	Noted	None
P1_00 049_S		Yes	Unsure	<ul style="list-style-type: none"> <li>No alternatives suggested</li> </ul>	Noted	None

Harala mbou						
P1_00 066_R Franks		Yes	Add cars and transportation	<ul style="list-style-type: none"> <li>Add cars/ transportation</li> </ul>	Noted	None
P1_00 068_A Clark		Yes	You should keep it real! State matters honestly - if we do this, it will do that - and quote your sources!	<ul style="list-style-type: none"> <li>State matters honestly</li> </ul>	Noted	None
P1_00 075_B Gibbs		Yes	Urgent attention to making the best of existing resources and avoiding an endless demolition/ construction cycle that is both wasteful and harmful to our environment.	<ul style="list-style-type: none"> <li>Make the best of existing resources and avoiding an endless demolition/ construction cycle that is both wasteful.</li> </ul>	Noted	None
P1_00 076_L Hull		Yes	Any new builds should be like eco towns, encouraging electric vehicles, protecting green spaces and using local materials with low carbon footprint.	<ul style="list-style-type: none"> <li>Any new builds should be like eco towns, encouraging electric vehicles etc</li> </ul>	Noted	None
P1_00 078_A Prior		Yes	Stress here on local transport needs as an overall consideration for development especially to facilitate safe walking and cycling.	<ul style="list-style-type: none"> <li>Need overall consideration for development to facilitate safe waling and cycling.</li> </ul>	Noted	None
P1_00 098_A Michae ls		Yes	Anything and everything that is actually impactful.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00 099_A Michae ls (counci llor)		Yes	As above (pasted below) TRDC should be going much further. Carbon neutral dwellings should be required in large developments and low carbon solutions to lighting and heating should be enforced to a much higher standard, around the 30-40% mark. Rain water recycling and other green initiatives should not be optional.	<ul style="list-style-type: none"> <li>Carbon neutral dwellings should be required in large developments.</li> </ul>	Noted	None
P1_00 107_R Webst er		Yes	Proper design of properties is now crucial to the comfort and well being of occupants, especially given the limits on space to build.	<ul style="list-style-type: none"> <li>Design of properties is now crucial to the comfort and well being of occupants, especially given the limits on space to build.</li> </ul>	Noted	None
P1_00 114_D Twinbe rrow		Yes	no statements on replacement of gas boilers in residential units?	<ul style="list-style-type: none"> <li>No statements on replacement of gas boilers</li> </ul>	Noted	None
P1_00 119_J Lovear d		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"> <li>Site is sanctuary for wildlife</li> </ul>	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_00 123_D Thoma s		Yes	I would like to hear more about encouraging how electricity generation (solar panels), use of shading and insulation, possible provision of cool community spaces for heat emergencies	<ul style="list-style-type: none"> <li>Encourage more electric generation on developments</li> </ul>	Noted	None
P1_00 131_P Harris		Yes	See above.	<ul style="list-style-type: none"> <li>Target is not ambitious enough</li> </ul>	Noted	None
P1_00 132_H Sahota		Yes	need expert advice	<ul style="list-style-type: none"> <li>Need expert advice</li> </ul>	Noted	None
P1_00 135_W Stephe ns		Yes	All new builds should meet achieve net zero carbon. Why are all going to suffer and especially the future generations if you do not act hard and fast	<ul style="list-style-type: none"> <li>All new builds should meet achieve net zero carbon.</li> </ul>	Noted	None
P1_00 142_Y Lloyd		Yes	.	<ul style="list-style-type: none"> <li>No alternatives suggested</li> </ul>	Noted	None
P1_00 144_D Thorpe		Yes	50% less CO2 emissions	<ul style="list-style-type: none"> <li>Target not ambitious enough. 50% target more realistic</li> </ul>	Noted	None
P1_00 147_N Hoad		Yes	A Positive Energy Building standard	<ul style="list-style-type: none"> <li>Positive energy building standard.</li> </ul>	Noted	None
P1_00 151_A Peat		Yes	Provision of more charging points in new developments and existing settlements for electric and hybrid vehicles.	<ul style="list-style-type: none"> <li>Need more vehicle charging points in new developments</li> </ul>	Noted	None

P1_00 155_C Sears		Yes	Solar panels as standard on some housing, and thinking about how the outside space around flats is used - e.g. including bike sheds, composting facilities. water butts to collect rain water, to give those without access to their own garden opportunities to use communal space in a more environmentally friendly way	• Solar panels as standard on some housing	Noted	None
P1_00 162_E Foulkes		Yes	I think on street electric car charging points should be required in all new build houses as well as reduction of CO2 emissions	• On street electric car charging points should be required in all new build houses as well as reduction of CO2 emissions	Noted	None
P1_00 170_N Hutchinson		Yes	Population growth is a major source of the growth of our Carbon Footprint, (More Feet) Yet the 4+ Bedroom Houses (@ Clause 4.14) in this plan account for 40% of new-builds. Thus the radical approach would be that no new Housing should be built with 4+ Bedrooms	• Population is more of a climate issue, radical approach would be no new housing built with 4+ homes	Noted	None
P1_00 191_J Shindler		Yes	As above	• All new developments should have zero carbon emission target; • mandatory mitigation of solar gain to protect from future extreme summer heat crises	Noted	None
P1_00 201_A Green		Yes		• No alternatives suggested	Noted	None
P1_00 209_G Bown		Yes	It is for councillors to consider sensible, alternative options and propose a range of those options	• For Councillors to consider alternatives	Noted	None
P1_00 215_L Horne		Yes	Look at how you can reduce car traffic. Rather than shifting the polluting issue else where. I.e. Currently there is pollution in watford. But your answer seems to be create out of town park and ride. How does that help? It just moves the problem. Start looking to use existing infrastructures. I.e the rail lines or even look at trams.	• Look at ways to reduce traffic	Noted	None
P1_00 218_M Chabreil		Yes	tighter expectations of criteria for energy generation and efficiency	• tighter expectations of criteria for energy generation and efficiency	Noted	None
P1_00 223_D Green		Yes	We should look at ways to increase the figure, working with environmental agencies/charities.	• Look at ways to increase the figure	Noted	None
P1_00 227_K Gallagher		Yes	The District Council should set a much higher target for reducing carbon emissions than currently allowed under National Planning Policy and challenge the Inspector and the Government to find against it. Passive cooling and adequate ventilation should be required alongside energy efficiency.	• Target is not ambitious enough.	Noted	None
P1_00 232_A Britton		Yes	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.	• All development, including extensions and adaptations, should be required to submit a Sustainability Statement;	Noted	None
P1_00 244_P Phillips		Yes	This section needs to offer a much more ambitious and joined-up vision of how we manage EVERYTHING in our area ..... even while acknowledging that the emphasis is on housing.	• Needs a more ambitious and joined up thinking	Noted	None
P1_00 254_P anning Bureau Ltd		Yes	We would respectfully request the Council considers whether the need for enhanced energy efficiency measures is a necessary requirement of Local Plan policy given Government's forthcoming changes to Part F and L of the Building Regulations. That a proportionate and appropriate cost is attributed towards the energy efficiency requirement detailed in <i>Preferred Policy 12</i> in the forthcoming Local Plan Viability Study. That interested parties are given the opportunity to comment on the Local Plan Viability Study, ideally prior to the Regulation 19 Local Plan being published for consultation.	• Request the Council considers whether the need for enhanced energy efficiency measures is a necessary requirement of Local Plan policy given Government's forthcoming changes to Part F and L of the Building Regulations.	Noted	None
P1_00 262_L Mead		Yes	Quantifiable standard should be prescribed.	• Quantifiable standard should be prescribed.	Noted	None
P1_00 265_D Parry		Yes	The approach needs to be extended to the emissions resulting from the development i.e. what is the short term impact of the increase carbon released resulting from the construction process and how are the developers going to offset this - in the short term. This could include investment in the implementation of renewable solutions elsewhere in the district.	• Extended emissions resulting from the development i.e. what is the short term impact of the increase carbon released resulting from the construction process	Noted	None
P1_00 267_D Lewis		Yes	Read the above. Obviously you need a policy which is not out of touch with the climate reality. It should be far more stringent, long-term and accountable.	• Need a policy which is not out of touch with climate reality.	Noted	None
P1_00 271_S		Yes	Seems sensible	• No alternatives suggested	Noted	None

REPRESENTATION REFERENCE	REPRESENTOR	YES/ NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Wallace						
P1_00 282_A Jenkins		Yes	See above	<ul style="list-style-type: none"> <li>No comment</li> </ul>	None	None
P1_00 293_J Bonner		Yes	Please see above and refer to the cover letter.	<ul style="list-style-type: none"> <li>Whilst agree with approach, must ensure that development is deliverable and viable to achieve targets.</li> </ul>	Noted	None

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Landowners/Promoters Representations

CARBON DIOXIDE EMISSIONS & ON-SITE RENEWABLE ENERGY

Q13. Do you think the Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach?						
PL_00 005_C FS3 CFS18 b CFS56	Pegasus Group on behalf of Taylor Wimpey Strategic Land		<p>2.22 The proposed policy requires all new residential development to submit an Energy Statement demonstrating that development proposals will produce 20% less carbon dioxide emissions than Building Regulations Part L requirements (2013), which may be achieved through a combination of energy efficient measures; incorporation of on-site low carbon and renewable technologies; connection to a local, decentralized, renewable or low carbon energy supply.</p> <p>2.23 The provisions of Preferred Policy 12 (Carbon Dioxide Emissions) are supported and in particular, Taylor Wimpey supports the flexible approach proposed by the Council in</p>	<ul style="list-style-type: none"> <li>Preferred Policy Option is supported and flexible approach to demonstrating reductions in CO2 emissions are welcomed.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	No action

			demonstrating reductions in carbon dioxide emissions as the UK transitions towards a net zero carbon future.			
			2.24 Taylor Wimpey is committed to being a sustainable housebuilder and continues to integrate sustainability into their business practices, helping to create better homes and communities and a stronger business for the longer term.			
				•		
				•		

Q13. Should we have considered alternative options?						
				•		
				•		
				•		