

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment
STATUTORY CONSULTEES

Q26. Do you think the Preferred Heritage and the Historic Environment is the right approach?						
SC_00002_Historic England	Historic England	Yes	<p>Heritage and the Historic Environment</p> <p>We welcome a policy on Heritage and the Historic Environment. However, we recommend that the text of the policy is reviewed to ensure that it is consistent with National Policy. Our recommended changes are outlined below.</p> <p>Listed Buildings</p> <p>While we welcome a separate heading for listed buildings, the policy omits a key element of the test in NPPF paragraph 195 - that the harm or loss is necessary to achieve substantial public benefits. It is not enough for substantial public benefits to outweigh the substantial harm, the harm or loss itself needs to be necessary to achieve the public benefits. It is also unclear regarding the approach to be taken to applications which would result in less than substantial harm. The paragraph should be amended to remain consistent with the Framework.</p> <p>Locally Important Buildings</p> <p>We welcome the reference to locally important buildings. As an overarching point, given the references to non-designated heritage assets throughout this Policy, a local list or other mechanism for recording archaeology, landscapes, buildings and areas of local importance would be welcomed. Historic England has published guidance pertaining to Local Listing which you may find helpful:</p> <p>https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/</p> <p>We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. A good example is Peterborough:</p> <p>http://www2.peterborough.gov.uk/environment/listed_buildings/locally_listed_building_s.aspx</p> <p>There are enough appeal cases to indicate that inspectors regard non-designated heritage assets, and something on a local list, as an important material consideration in planning decisions. In fact, where there isn't a local list, some inspectors have been unable to give as much weight to a non-designated heritage asset. Our website contains a number of appeal cases and if you search for 'locally listed heritage asset' or 'non-designated heritage asset', you will get relevant ones:</p> <p>http://www.historicengland.org.uk/advice/hpg/planning-cases/</p> <p>Robust provision for these heritage assets will increase the soundness of your forthcoming plan.</p> <p>Historic Parks and Gardens</p> <p>While we welcome the reference to non-designated historic landscapes, greater clarity is needed regarding the approach to be taken towards applications affecting Registered Parks and Gardens compared with those affecting unregistered Parks and Gardens. The policy should set out a clear distinction between the Registered and unregistered parks and gardens, remembering that the thresholds in paragraph 196 (designated heritage assets) and paragraph 197 (non-designated heritage assets) of the Framework are different.</p> <p>Archaeology</p> <p>We welcome a section on archaeology, but recommend renaming it 'Archaeology and Scheduled Monuments' and amending the supporting text to reflect that scheduled monuments can also be above ground / upstanding structures and constitute built heritage.</p> <p>Greater clarity is also needed in relation to non-designated archaeology. As drafted the Policy appears to relate only to Scheduled Monuments, and non-designated archaeological assets which are demonstrably of equivalent significance. The policy should set out a clear distinction between the approach taken towards applications affecting Scheduled Monuments and other nationally important sites compared with archaeological remains of lesser importance, remembering that the thresholds in</p>	<ul style="list-style-type: none">We welcome a policy on Heritage and the Historic Environment. However, we recommend that the text of the policy is reviewed to ensure that it is consistent with National Policy.Listed buildings- While we welcome a separate heading for listed buildings, the policy omits a key element of the test in NPPF paragraph 195 - that the harm or loss is necessary to achieve substantial public benefits. It is not enough for substantial public benefits to outweigh the substantial harm, the harm or loss itself needs to be necessary to achieve the public benefits. It is also unclear regarding the approach to be taken to applications which would result in less than substantial harm. The paragraph should be amended to remain consistent with the Framework.Locally important buildings - As an overarching point, given the references to non-designated heritage assets throughout this Policy, a local list or other mechanism for recording archaeology, landscapes, buildings and areas of local importance would be welcomed. Historic England has published guidance pertaining to Local Listing which you may find helpful: https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan.Historic Parks and Gardens- greater clarity is needed regarding the approach to be taken towards applications affecting Registered Parks and Gardens compared with those affecting unregistered Parks and Gardens. The policy should set out a clear distinction between the Registered and unregistered parks and gardens, remembering that the thresholds in paragraph 196 (designated heritage assets) and paragraph 197 (non-designated heritage assets) of the Framework are different.Archaeology - recommend renaming it 'Archaeology and Scheduled Monuments' and amending the supporting text to reflect that scheduled monuments can also be above ground / upstanding structures and constitute built heritage.Greater clarity is also needed in relation to non-designated archaeology. As drafted the Policy appears to relate only to Scheduled Monuments, and non-designated archaeological assets which are demonstrably of equivalent significance. The policy should set out a clear distinction between the approach	<p>Reg 18 Preferred Policy Option 25 (7) states that:</p> <p>'The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF, as well as the following criteria:</p> <p>and is followed by (8) Listed Buildings which states:</p> <p>'Proposals should conserve or enhance Listed Buildings. Applications involving demolition of a Grade II Listed Building will only be granted in exceptional circumstances, and demolition of or substantial harm to a Grade I or Grade II* Listed Building will only be granted in wholly exceptional circumstances.'</p> <p>Paragraph 201 (was 195) states:</p> <p>Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <p>a) the nature of the heritage asset prevents all reasonable uses of the site; and</p> <p>b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</p> <p>c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</p> <p>d) the harm or loss is outweighed by the benefit of bringing the site back into use.</p> <p>The policy is clear in that applications will be assessed against NPPF and that Policy 25 (8) is in addition to the NPPF requirements. NPPF policies need not be restated in Local Plans.</p> <p>Historic Parks and Gardens- Agreed.</p> <p>Archaeology- agreed.</p>	<p>Changes required to text:</p> <p>Listed Buildings- check policy against NPPF guidance.</p> <p>Locally listed buildings- The Council does have a List of Locally Important Buildings and a set of criteria. This is referred to in paragraph 11.57 Locally Important Buildings.</p> <p>A link to the Council's web page that contains the List of Locally Important Buildings can be included in the Regulation 19 version.</p> <p>Historic Parks and Gardens- The policy should set out a clear distinction between the Registered and unregistered parks and gardens, remembering that the thresholds in paragraph 196 (designated heritage assets) and paragraph 197 (non-designated heritage assets) of the Framework are different.</p> <p>Archaeology - Header to be amended to <i>Archaeology and Scheduled Monuments</i> in the policy text and Paragraph 11.60. The Glossary of the Regulation 19 consultation will include a description of scheduled monuments to reflect that these can be above ground/upstanding structures and constitute built heritage.</p> <p>Amend policy to reflect key tests in paragraph 193 and 194 of the NPPF in relation harm of loss of significance, jumping straight to loss, and preservation by record / publication/curation of findings following archaeological works.</p> <p>Can we add an additional paragraph to the draft policy after (7) to reflect paragraphs 199 and 200 (previously 193 and 195) or is this covered under existing Preferred Policy Option 25 (7) which states that:</p> <p>'The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF, as well as the following criteria:</p>

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			<p>paragraph 196 (designated heritage assets) and paragraph 197 (non-designated heritage assets) of the Framework are different.</p> <p>In addition to this the policy also omits the key tests in paragraph 193 and 194 of the NPPF in relation harm of loss of significance, jumping straight to loss, and preservation by record / publication/curation of findings following archaeological works. The policy should be amended to make explicit that loss would be wholly exceptional, and only where it is necessary to achieve substantial public benefits that outweigh the harm or loss - it is not enough for substantial public benefits to outweigh the substantial harm, the harm itself needs to be necessary to achieve the public benefits.</p> <p>CONCLUSIONS</p> <p>In preparation of the Regulation 19 Draft Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p> <p>Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.</p> <p>Finally, we should like to stress that this response is based on the information provided by the Councils’ in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.</p> <p>If you have any questions with regards to the comments made, then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime, we look forward to continuing to work with you and your colleagues.</p>	<p>taken towards applications affecting Scheduled Monuments and other nationally important sites compared with archaeological remains of lesser importance, remembering that the thresholds in paragraph 196 (designated heritage assets) and paragraph 197 (non-designated heritage assets) of the Framework are different.</p> <ul style="list-style-type: none"> In addition to this the policy also omits the key tests in paragraph 193 and 194 of the NPPF in relation harm of loss of significance, jumping straight to loss, and preservation by record / publication/curation of findings following archaeological works. The policy should be amended to make explicit that loss would be wholly exceptional, and only where it is necessary to achieve substantial public benefits that outweigh the harm or loss - it is not enough for substantial public benefits to outweigh the substantial harm, the harm itself needs to be necessary to achieve the public benefits. 		
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	Yes	<p>Croxley Green Parish Council suggests that public access to heritage buildings should be encouraged wherever possible. We suggest that demolition should be specifically included to avoid any misunderstanding (although demolition is development, per se).</p> <p>We endorse the comments from Jed Griffiths’ statement about including the wording from the current Local Plan: Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that (a) The structure to be demolished makes no contribution to the special character or appearance of the area, or; (b) It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; (c) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.</p> <p>The Council will not normally grant consent for the demolition of a building in a Conservation Area unless planning permission has been given for the redevelopment of the site. We also endorse his comments about protecting the setting of a Conservation Area or listed building and commend his wording: “Permission will not be granted for development outside or near to a Conservation Area if it adversely affects the setting, character, appearance, or public views into or out of that Conservation Area.” We consider this should also apply to advertisement consents. Otherwise we support the general approach.</p>	<ul style="list-style-type: none"> include wording from the current Local Plan - Protecting the setting of a Conservation Area or listed building and suggested wording: “Permission will not be granted for development outside or near to a Conservation Area if it adversely affects the setting, character, appearance, or public views into or out of that Conservation Area.” We consider this should also apply to advertisement consents. Support general approach 	Agreed.	<p>Include wording from the current local plan Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that (a) The structure to be demolished makes no contribution to the special character or appearance of the area, or; (b) It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; (c) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.</p>
SC_00024_Abbots Langley Parish Council	Abbots Langley Parish Council	No	<p>I think the policy for listed buildings acts to prevent their continued occupation as a residential asset in the community, the feelings for conservation differ wildly across the field, surely building a pastiche extension destroy the historical context of the original building whereas a juxtaposed modern extension maintains the ‘gap’, this is another woolly statement, the extension to St Lawrence Church, would / would not be allowed under this policy? Also protecting the area around a conservation area forces residents to install Permitted Development monstrosity extensions, I would suggest that the policy needs to look at ways of reducing PD fallback, Rather than encourage it in areas of listed buildings and conservation areas.</p>	<ul style="list-style-type: none"> suggests that the policy needs to look at ways of reducing PD fallback, Rather than encourage it in areas of listed buildings and conservation areas. 	Noted. In accordance with NPPF, the policy approach supports the safeguarding of heritage assets and their re-use. This will contribute to the conservation of the historic environment, local character and help sustainability.	No action
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure	No	<p>Preferred Policy Option 25: Heritage and the Historic Environment</p> <p>It is considered that when it deals with the historic environment, the draft plan mostly repeats the NPPF guidance for the historic environment. There is little about what makes Three Rivers distinctive from the point of view of the historic environment, nor what might be considered important locally. Therefore, the draft plan lacks local distinctiveness and in many places is generic. Read as a whole, the parts dealing with the historic environment are muddled. As noted above, the historic environment record does not appear to have been consulted, which would have allowed for a comprehensive assessment of the heritage assets in the district. For example, the draft</p>	<ul style="list-style-type: none"> The draft plan mostly repeats the NPPF guidance for the historic environment. There is little about what makes Three Rivers distinctive from the point of view of the historic environment, nor what might be considered important locally. The historic environment record does not appear to have been consulted, For example, the draft plan notes that there are 19 archaeological sites in the district, 	Agreed	<p>Need a more focused policy and section to reflect what makes Three Rivers distinctive from the point of view of the historic environment, nor what might be considered important locally. Need to refer to the Historic Environment Record.</p>

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

		<p>plan notes that there are 19 archaeological sites in the district, this is inaccurate and no source for this assertion is given. Although the plan does include the Grand Union Canal together with its three rivers as important local features for the district it fails to acknowledge that the canal itself is a heritage asset not just historic features associated with it.</p> <p>The team is pleased to see that Policy 23 proposes new development should reference the local character. It is recommended that this includes historic architectural styles and use of local building materials. This should be sympathetic to historic buildings of the area, both in the surrounding Chilterns as well as reflecting the district's historic settlements. This will help the district to be distinctive and create a sense of place and enable development to sit appropriately within the local area. We are pleased to see that the draft plan requires that where possible historic buildings should be kept and re-used. This will contribute to the conservation of the historic environment, local character and help sustainability.</p> <p>The existing draft text notes that the NPPF requires non-designated heritage assets which are of equivalent significance to designated ones to be treated as if they are (Part (16), Preferred Policy Option 25) but does not go further. It is therefore important that the Local Pan allows for the identification and conservation of as yet unknown heritage assets as well as the higher significance that the assessment of heritage assets that have already been recorded may identify. The draft plan refers to Areas of Archaeological Significance but does not explain what they are for or how they work. This should be clarified.</p> <p>The county council also recommends that there is a requirement for access to a suitable repository to store the archives of any archaeological investigations which have taken place in the district, and that these are made available to the residents of Three Rivers district as well as the wider public.</p> <p>The expected scope and content of Heritage Impact Assessments which the Local Plan proposes to be submitted with development proposals should be clarified (part 2, Sites for Potential Allocation). This is because the information required to enable the planning authority to make an informed decision regarding the historic environment is more clearly contained in existing document types such as archaeological desk-based assessments, historic building assessments and Conservation assessments. As the archaeological planning advisors to the district the county council believes this lack of clarity has the potential to affect the relevance of archaeological information which is submitted with planning proposals.</p> <p>On the basis of current information, the county council does not object to the allocation in the Local Plan of the sites that have been proposed. However, many of the other sites will require archaeological assessment prior to the submission of a planning application and/or development of a site masterplan since they have the potential to contain heritage assets which may be a constraint on development.</p> <p>Paragraph 12.0 Transport. It should be recognised by the LPA that to accommodate this growth the use of existing transport network will need to be more efficient. The current 40 very high use of private car for many short journeys is causing significant issues for all travel and wider impacts to health, place and the environment.</p> <p>Paragraph 12.2 HCC can provide data here to give a fuller picture on existing travel behaviour, mostly to highlight the significant number of very short journeys made by car if required. A significant portion of vehicles causing the congestion are travelling very short distances that could be walked or cycled if the right infrastructure were in place and measures to support behaviour change implemented. This is also the point to outline the wider role transport plays on place, and we are not solely interested in commuting and rush hour issues, but the sustainable impacts of all movement in the district.</p> <p>Paragraph 12.3. This is to recommend that the phrase ‘Promoting’ should be strengthened to requiring or highlight it is absolutely essential, along with enabling an environment where people change the way they travel to more sustainable modes.</p> <p>Paragraph 12.4. With regard to the sentence: “Hertfordshire County Council will produce a Growth and Transport Plan (GTP) for South West Hertfordshire....” it should be noted that a GTP has already been produced and is available publicly. Whilst HCC is committed to collaborative working and supporting the development of the plan, HCC does not envisage producing a new GTP. The local plan will be required to understand its own impacts on travel and transport infrastructure, including the infrastructure needed and funding mechanisms in place to ensure the plan is deliverable, including a</p>	<p>this is inaccurate and no source for this assertion is given. Although the plan does include the Grand Union Canal together with its three rivers as important local features for the district it fails to acknowledge that the canal itself is a heritage asset not just historic features associated with it.</p> <ul style="list-style-type: none"> • The team is pleased to see that Policy 23 proposes new development should reference the local character and that the draft plan requires that where possible historic buildings should be kept and re-used. • The existing draft text notes that the NPPF requires non-designated heritage assets, but does not go further. It is therefore important that the Local Plan allows for the identification and conservation of as yet unknown heritage assets as well as the higher significance that the assessment of heritage assets that have already been recorded may identify. • The draft plan refers to Areas of Archaeological Significance but does not explain what they are for or how they work. This should be clarified. The county council also recommends that there is a requirement for access to a suitable repository to store the archives of any archaeological investigations which have taken place in the district, and that these are made available to the residents of TRD as well as the wider public. • The expected scope and content of Heritage Impact Assessments which the Local Plan proposes to be submitted with development proposals should be clarified (part 2, Sites for Potential Allocation) this lack of clarity has the potential to affect the relevance of archaeological information which is submitted with planning proposals. • The county council does not object to the allocation in the Local Plan of the sites that have been proposed. • Suggested amendments to paras 12.3, 12.4 and 12.7. 	<p>Areas of Archaeological Significance need to explain what they are for or how they work.</p> <p>The county council also recommends that there is a requirement for access to a suitable repository to store the archives of any archaeological investigations which have taken place in the district, and that these are made available to the residents of TRD as well as the wider public.</p> <p>The expected scope and content of Heritage Impact Assessments which the Local Plan proposes to be submitted with development proposals should be clarified (part 2, Sites for Potential Allocation).</p> <p>Suggested amendments to paras 12.3, 12.4 and 12.7.</p>
--	--	--	---	---

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			<p>detailed IDP suitable for viability testing and associating costs to sites where it is essential.</p> <p>Paragraph 12.7 HCC suggests the concept of key destinations and making journeys to those destinations to be included in promoting sustainability.</p>			
SC_0002 8_Canal & River Trust	Canal & River Trust	No	<p>The proposed policy option adopts a typically generic approach to safeguarding heritage and the historic environment (Preferred Policy Option 25, pp82-87). However, it omits to highlight the heritage significance of the Grand Union Canal, a key and extensive item of historic infrastructure defining the character of its own corridor of which 11.8km length occurs within, or along the boundary of the Three Rivers District. Only three small sections of the Grand Union canal are currently afforded the protection of conservation area status (Stocker's Lock and Farm, Grove Mill and Hunton Bridge) with distinctive grouping of waterway-related structures, such as at Batchworth Lock, where the topography is shaped by the confluences of the Rivers Chess and Colne, are not captured by the Rickmansworth Town Centre conservation area. Safeguarding of the heritage significance of the Grand Union canal is not addressed until Preferred Policy Option 29, though here the safeguards are applied only to proposed new moorings and marinas rather than all types of development that could affect the waterway corridor. This policy or Policy option 29 should be amended accordingly to address this.</p>	<ul style="list-style-type: none"> Does not safeguard heritage and the historic environment for the Grand Union Canal; Only three small sections which are protected; Safeguarding not addressed fully until Preferred Option 29 but only for proposed new moorings and marinas rather than all forms of development. Should be amended to include all forms of development. 	Acknowledge that the Grand Union Canal is a heritage asset and agree amendments to policy.	Need to add text to the policy acknowledging the heritage importance of the grand union canal. And policy should refer to all forms of development.
SC_0003 1_Natura l England	Natural England	Yes	<p>Natural England broadly supports the use of sustainable transport options such as walking, cycling, and public transport. We would advise consideration of potential to link these transport options with green infrastructure through green chains and corridors, which in turn would improve access to nature in addition to providing recreational, health and wellbeing benefits for people.</p>	<ul style="list-style-type: none"> Broadly supports the use of sustainable transport options such as walking, cycling, and public transport. We would advise consideration of potential to link these transport options with green infrastructure through green chains and corridors, which in turn would improve access to nature in addition to providing recreational, health and wellbeing benefits for people. 	Agreed.	<p>Additional wording to be added to Policy 26 Sustainable Transport & Travel: Under Development Management 4)</p> <p>f) Linkages to green infrastructure networks</p>
SC_0002 O_Chorle ywood Parish Council			<p>No. Whilst this is a fairly comprehensive policy on the protection of Grade 1 and 2 listed buildings and conservation areas in Three Rivers District. However, we have the following concerns:</p> <ul style="list-style-type: none"> Under the heading ' Listed Buildings '. Section (8) reads; "Proposals should preserve or enhance Listed Buildings. Applications involving demolition of a Grade 2 Listed Building will only be granted in exceptional circumstances and demolition or substantial harm to a Grade 1 or 2 Listed Building will only be granted in wholly exceptional circumstances". We would like to see examples of this given. It is assumed that it has happened in the past, but it might help to better understand the policy if a list of reasons area given for demolition. Many historic buildings have been rescued in the past when facing demolition. The in section covering Conservation Areas, the following two policies, that are included in the current Local Plan but have been omitted from the new proposed policies, need adding: <ul style="list-style-type: none"> o Development Adjacent to Conservation Areas: The setting of Conservation Areas is generally very important to maintaining the integrity of the Conservation Area. In the current Local Plan, this concept is supported by the inclusion of controls on development adjacent to Conservation Areas however, these controls have been omitted from the new Local Plan. As such it is requested that the following wording be inserted into the new Local Plan. <p>Demolition: The previous local plan gave clear guidance on when demolition in a Conservation Area would be allowed. Whilst demolition of an existing building is generally covered by Permitted Development, this is not true in Conservation Areas where permission is required. It is important that the Local Plan makes this clear to residents to help avoid any demolitions occurring that subsequently have to be rebuilt by the resident as they are not permitted. The previous Local Plan covered this well, including giving guidance as to when permission might be granted, and it is requested that the wording from this be included within the new plan</p> <p>"Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area."</p> <p>It has been previously suggested that this is covered by paragraph 11 of the new Plan, however this is limited to development within the Conservation Area and therefore does not provide appropriate controls to the setting of the Conservation Area.</p> <p>"Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that:</p> <ol style="list-style-type: none"> The structure to be demolished makes no contribution to the special character or appearance of the area, or; it can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; 	<ul style="list-style-type: none"> Should give specific examples of reasons demolition of Listed Buildings may be permitted Some wording from the previous Local Plan regarding demolition in Conservation Areas has not been included in the proposed new policy, this wording should be added. 		Include wording from current Local Plan re. demolition in Conservation Areas

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			<div> 3. it can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area. </div> <div> The Council will not normally grant consent for the demolition of a building in a Conservation Area unless planning permission has been given for the redevelopment of the site." </div>			
--	--	--	--	--	--	--

NON-STATUTORY RESPONDENTS

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER’S/ COUNCIL’S PROPOSED ACTION
Q26. Do you think the Preferred Heritage and the Historic Environment is the right approach?						
P1_00002		Yes	Seems to follow national policy.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00003		Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00005		Yes	Nothing to add	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00006		Yes	History and heritage should be given all due respect in the area. This is in both urban and countryside and illustrates the respect that the past should be afforded locally.	<ul style="list-style-type: none"> Agree with approach. History and heritage should be given all due respect in the area. 	None	None
P1_00014		Yes	Makes logical sense	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00017		Yes	Only if you use legal powers to enforce	<ul style="list-style-type: none"> Only if enforced 	Noted	None
P1_00019		Yes		<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00020		Yes	N/A	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00023		Yes	Ok	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00024		Yes	We must protect our historical and heritage sites for future generations.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00025		No	Reduce access to historical environment	<ul style="list-style-type: none"> Reduce access to historical environment. 	Noted	None
P1_00026		Yes	Clear Policy	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00027			There should be requirement for enhancing public access to heritage assets. These are assets for the community, not only individual owners.	<ul style="list-style-type: none"> Need a requirement for enhancing public access to heritage assets. 	Noted	None
P1_00028		Yes	Ok	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00032		Yes	It’s the right approach.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00033		Yes	Any enhancements to listed buildings should also consider the environmental impacts.	<ul style="list-style-type: none"> Any enhancements to listed building should consider environmental impacts 	Noted	None
P1_00034		Yes	No Comment	<ul style="list-style-type: none"> Support 	Noted	None
P1_00038		Yes	Essential to maintain the historical character of the area	<ul style="list-style-type: none"> Support 	Noted	None
P1_00040		No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> Do not develop 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 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.	None

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

					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_00041		Yes	We must protect our history for future generations.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00043		No	Regular assessment & addition to locally important buildings list	<ul style="list-style-type: none"> Regular assessment and addition to locally important buildings list 	Noted	None
P1_00046		Yes	We must protect our heritage and historic environment. So important	<ul style="list-style-type: none"> Agree with approach. Protect heritage and historic environment. 	Noted	None
P1_00047		Yes	This policy is correct.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00048		Yes	No Comment	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00049		Yes	Character and heritage should be protected.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00053		Yes	Yes	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00054		Yes	Agree	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00055		Yes	Our heritage should be preserved	<ul style="list-style-type: none"> Preserve the heritage 	Noted	None
P1_00056		Yes	A responsible approach.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00057		No	Protect protected species, and conserve areas of diverse wildlife.	<ul style="list-style-type: none"> Protect protected species and diverse wildlife. 	Noted	None
P1_00063		Yes	Agree	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00064		Yes	xxx	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00066		No	Should not be allowed at all	<ul style="list-style-type: none"> Do not allow at all. 	Noted	None
P1_00068		No	Most of this section sounds good but the reality leaves much to be desired. I have experience of the Council's objections and confused thinking over the redevelopment of a listed barn that was in real danger of collapse, by the time matters were resolved much of the original building had perished and the allowed scheme is one of the most ugly constructions I know - and I've know quite a lot!	<ul style="list-style-type: none"> Most of this section sounds good, but from personal experience, concerns that this will not be enforced. 	Noted	None
P1_00069		No		<ul style="list-style-type: none"> Do not agree with approach but no reasons given. 	Noted	None
P1_00071		Yes	I Agree.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00074		Yes		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00076		Yes	Sounds good	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00077		Yes	Y	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00078		Yes	Reasonable requirements.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00080		Yes	Do not build around it so it's ruined its history and heritage so do all you can to keep it	<ul style="list-style-type: none"> Agree with approach. Do not build around it so it ruined and heritage. 	Noted	None
P1_00084		Yes	We need to keep the existing conservation areas safe.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00088		Yes	Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00089		Yes	We need to conserve the heritage of sites around Chorleywood such as Chorleywood House and Chenies House, these are great assets to where we live and bring in revenue to the area without spoiling or harm caused.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00096		Yes	Seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00097		Yes	Important to protect listed buildings, conservation areas and historic buildings, they are a vital and irreplaceable part of our heritage.	<ul style="list-style-type: none"> Agree with approach. Important to protect listed buildings. 	Noted	None
P1_00098		Yes	stop asking me to write when I've said yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00099		Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00100		No	In the current Local Plan adopted in July 2013, it is stated under DM3 c) Conservation Areas, item f that "permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area." This policy is an excellent policy as it protects for future generations, the setting of historic heritage assets that fall under the council's care. However it is noted that this policy has been omitted from the proposed New Local Plan. It is vital that this policy must be carried forward to the New Local Plan and not left out.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3©). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00102		Yes	Heritage assets, the historic environment and conservation areas must be protected at all costs and nothing should be done which would have a negative impact on them. The Killingdown Farm development is a prime example of greedy developers ignoring the impact of their construction on a conservation area.	<ul style="list-style-type: none"> Agree with approach; Killingdown Farm development prime example of developers ignoring impact of construction on a conservation area. 	Noted	None
P1_00106		Yes	Destroying everything, impact on green belt, facilities.	<ul style="list-style-type: none"> Agree with approach, otherwise will destroy everything. 	Noted	None
P1_00107		Yes	I think I can agree with most of that.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00108		Yes	common sense	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00110		Not Specified	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00111		No	We object to the omission of the following text previously part of paragraph (f) in relation to Conservation Areas under draft Policy DM3 (Preferred Policies Consultation), which states 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area'. We request that this paragraph is reinstated as	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3©). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			part of the Conservation Area section of the Policy on Heritage and the Historic Environment. The setting of a Conservation Area, surrounding context and local views will influence its significance as a Heritage Asset. It is important, therefore, that the impact and potential harm of new development near to a Conservation Area is fully assessed as part of the requirement to preserve and enhance the character and appearance of a Conservation Area. We request that this is embedded in the Policy.			
P1_00112		Yes	Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00113		Yes	No reason	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00114		Yes	caveat - define unacceptable harm, as would be perceived by a reasonable person, with no vested interest	<ul style="list-style-type: none"> Agree with approach, define unacceptable harm. 	Noted	None
P1_00116		Yes	I agree with the policy as stated.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00117		Yes	Maintaining history is important	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00119		No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Land is sanctuary for wildlife. 	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_00120		Yes	Seems Sensible	<ul style="list-style-type: none"> Agree with the approach 	Noted	None
P1_00121		Yes	Forget the greenbelt - find alternatives	<ul style="list-style-type: none"> Do not develop in the Green Belt 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these 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_00123		Yes	It is fine and provides good protection. I fear we may have some redundant churches during the plan period which would provide some planning challenges.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00126		Not Specified	The Heronsgate Residents Association (HRA) agrees with most of the approach suggested and applauds the continued commitment of TRDC and the planning officers to conserve and enhance the historic environment. The commitments suggested in paragraph 11 relating to Conservation areas are particularly important for Heronsgate. Specifically, the HRA would like to emphasise the importance of continuing to include the following sections. That development proposals within Conservation Areas: 11 c) – retain ‘roadside banks and verges’ – which is essential to protect Long Lane’s heritage status. 11 e) – ‘Does not harm important views into, out of or within the Conservation Area’ – which is essential to protect the agrarian setting of Heronsgate. 11 f) - ‘Protects trees, hedgerows and other significant landscape features’ – which is also important for Long Lane and the boundary of the Conservation Area. The HRA suggests that the approach adopted could be further improved by retaining a clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out of Preferred Policy Option 25. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, <i>‘Permission will not be granted for</i>	<ul style="list-style-type: none"> Agree with most of the approach; Would like to add some additional points on Heronsgate; Omitted <i>“Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area”</i>; HRA fears proposed policy option 25 overly focussed on the impact of development within a Conservation Area and fails to give sufficient weight to protecting against development outside but near to a Conservation Area. 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			<i>development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area'</i> (p.14). Development outside but near to a Conservation Area can have a greater adverse impact on the setting, character, appearance of or views in to or out of a Conservation Area than development within a Conservation Area. If the development is directly adjacent to the Conservation Area or by a sole access point, then the setting and views out would be severely impaired. Damage to the setting of a Conservation Area can undermine its heritage significance. The NPPF 2021 Glossary defines the setting of a heritage asset as <i>'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.'</i> Under the definition of Significance (for heritage policy), <i>'Significance derives not only from a heritage asset's physical presence, but also from its setting.'</i> NPPF (2021) paragraph 194 states <i>'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'</i> The HRA fears that the proposed policy option 25 is overly focussed on the impact of development within a Conservation Area and fails to give sufficient weight to protecting against development outside but near to a Conservation Area. In line with the aims of National Planning Policy and to protect the setting and significance of the Heronsgate Conservation Area from being harmed by development outside but near to its boundary, the HRA requests that paragraph f) is retained as a preferred policy in the new Local Plan.			
P1_00127		Yes		<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00130		Yes	Always preserve heritage	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00131		No	5) 'should be accompanied by an appropriate desk-based assessment, and where necessary a field evaluation'. Field evaluation is a must to avoid anything important being missed by mistake (or deliberately). NPPF - you should spell that acronym out in full (National Planning Policy Framework).	<ul style="list-style-type: none"> Site visits are a must; Should spell out NPPF acronym in full; 	Noted	None
P1_00132		Yes	balanced approach is best	<ul style="list-style-type: none"> Agree with balanced approach 	Noted	None
P1_00133		Not Stated	Currently some Conservation Areas are declared, but the follow on design guide work has not been developed. It should be.	<ul style="list-style-type: none"> Some conservation areas are declared, but the follow on design guide needs to be developed. 	Noted	None
P1_00134		Not Specified	It appears that a clause relating to a conservation area has been conveniently omitted in the TRDC preferred policies consultation document whereby it should read 'Permission will not be granted for development outside but near to a Conservation area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area'. Would you kindly include this paragraph under the option for Heritage and the Historic Environment.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00135		Yes	Good Stuff	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00137		Yes	I Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00140		Yes	Agree on all points	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00141		Yes	All heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Local Heritage Lists as described in Historic England HEAN7 on 'Identifying and Conserving Local Heritage' and as advocated under the MHCLG pilot programme should be compiled for all undesignated heritage assets in Three Rivers District. Hertfordshire Gardens Trust has compiled such lists for the historic gardens and parks of other LPAs within Hertfordshire and would be happy to help if required.	<ul style="list-style-type: none"> Agree with approach. Hertfordshire Gardens Trust happy to help with the policy 	Noted	None
P1_00142		No	.	<ul style="list-style-type: none"> Do not agree with approach but no reason given 	Noted	None
P1_00144		No	We will have to sacrifice some visual aspects to high rise, if we want to preserve green belt	<ul style="list-style-type: none"> Have to sacrifice some visual aspects to high rise, if wanting to preserve Green Belt 	Noted	None
P1_00147		Yes	Fine	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00148		Yes	Preserving the areas cultural past is important to its distinctiveness	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00149		No	I agree with the Chorleywood Residents Association position: Whilst there is much of merit contained in the policy, one omission needs to be corrected to properly protect conservation areas across the district: Development Adjacent to Conservation Areas The setting of Conservation Areas is very important to maintaining the integrity and character of each Conservation Area. In the current Local Plan this concept is supported by the inclusion of controls on development adjacent to Conservation Areas. However, these controls have been omitted from the new Local Plan. We therefore request that the following wording be reinserted into the new Local Plan: "Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area."	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00150		No	There are two major omissions on the policies relating to Conservation Areas, both of which are important. First, the current Local Plan gives clear guidance on when demolition in Conservation Areas should be permitted. It is vital that the new Local	<ul style="list-style-type: none"> Two major omissions from the Local Plan; Current Local Plan gives clear guidance on demolition, but not in this Local Plan; 	Noted	Include wording from the current local plan Within Conservation Areas, permission for demolition or

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			Plan also makes this clear to property owners in Conservation Areas, to avoid any confusion and possible enforcement actions. Second, it is widely recognised that the setting of a Conservation Area is normally very important to maintaining its integrity. This is clearly recognised in the existing Local Plan, but the appropriate policy has been omitted from Preferred Policy Option 25. Sub-paragraph (11) could have covered this point, but it is limited to development within the Conservation Area, and not within its setting.	<ul style="list-style-type: none"> Widely recognised that setting of a Conservation Area is important to maintaining its integrity. Recognised in existing Local Plan, but policy has been omitted from Preferred Policy Option 25 		substantial demolition will only be granted if it can be demonstrated that (a) The structure to be demolished makes no contribution to the special character or appearance of the area, or; (b) It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; (c) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area. Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00151		Yes	Because it is important to preserve our heritage.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00154		Not Stated	42. Whilst the Associations support much of the contents of Preferred Policy Option 25, there are two major omissions on the policies relating to Conservation Areas. These are both important. First, the current Local Plan gives clear guidance on when demolition in Conservation Areas should be permitted. It is vital that the new Local Plan also makes this clear to property owners in Conservation Areas, to avoid any confusion and possible enforcement actions. It is suggested that the wording from the existing Local Plan should be included in the new version, as follows: <i>“Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that: The structure to be demolished makes no contribution to the special character or appearance of the area, or; it can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; it can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area. The Council will not normally grant consent for the demolition of a building in a Conservation Area unless planning permission has been given for the redevelopment of the site.”</i> 43. Second, it is widely recognised that the setting of a Conservation Area is normally very important to maintaining its integrity. This is clearly recognised in the existing Local Plan, but the appropriate policy has been omitted from Preferred Policy Option 25. Sub-paragraph (11) could have covered this point, but it is limited to development within the Conservation Area, and not within its setting. Accordingly, it is requested that the following wording should be added: <i>“Permission will not be granted for development outside or near to a Conservation Area if it adversely affects the setting, character, appearance, or public views into or out of that Conservation Area.”</i>	<ul style="list-style-type: none"> Two major omissions from the Local Plan; Current Local Plan gives clear guidance on demolition, but not in this Local Plan; Widely recognised that setting of a Conservation Area is important to maintaining its integrity. Recognised in existing Local Plan, but policy has been omitted from Preferred Policy Option 25 	Noted	Include wording from the current local plan Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that (a) The structure to be demolished makes no contribution to the special character or appearance of the area, or; (b) It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; (c) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area. Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00155		Yes	It is important to protect heritage and conservation sites, a sense of character to a place enhances the sense of home .In protecting these things, we communicate that a place is cared about which in turn encourages that sense of care in those visiting and looking to live there.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00162		Yes	This is a sensible approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00163		Yes	It is important to protect the historic assets we have	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00166		Yes	N/A	<ul style="list-style-type: none"> No comment 	Noted	None
P1_00167		Not Stated	TRDC should consider how it can prevent further blight in Rickmansworth in and around the town centre.	<ul style="list-style-type: none"> Need to consider how to prevent further blight in Rickmansworth 	Noted	None
P1_00170		No	TRDC Council's List of Locally Important Buildings contains too many buildings. By the plans admission many of these buildings were built in the 19th & 20th centuries, so are hardly "historic". These buildings are not constructed to modern standards and thus are no way carbon neutral, often cold and draughty, thus many are falling into disrepair and thus it is difficult for their owners to find new uses to ensure their continued beneficial use.	<ul style="list-style-type: none"> Local list contains too many buildings, built in 19th and 20th century buildings, not historic; Not to modern standards, difficult to repair and not be on the list 	Noted	None
P1_00174		Yes	Agree with this approach.	<ul style="list-style-type: none"> Agree with this approach 	Noted	None
P1_00181		Not Specified	The Society supports this Preferred Policy Option. It is particularly important in the Chilterns that new developments fully consider local distinctiveness within their immediate locality. 11.28 - again a glib reference is made to 'highest design quality' in (1) with no means to evaluate what that means, this leaves it far too open for ill informed decision making.	<ul style="list-style-type: none"> Agree with approach. New developments should consider local distinctiveness. 	Noted	None
P1_00183		Yes	As above	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00184		No	Public access to heritage buildings should be encouraged wherever possible even if it is only once a year. Local residents should know about the local heritage. Demolition should be specifically included to avoid any misunderstanding (although demolition is development, per se).	<ul style="list-style-type: none"> Public access to heritage should be encouraged wherever possible, avoid demolition. 	Noted	None

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

P1_00186		Yes	This development will have a significant negative impact on the environment and infrastructure	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00187		No	Public access to heritage buildings should be encouraged wherever possible even if it is only once a year. Local residents should know about the local heritage. Demolition should be specifically included to avoid any misunderstanding (although demolition is development, per se).	<ul style="list-style-type: none"> Public access to heritage should be encouraged wherever possible, avoid demolition. 	Noted	None
P1_00190		Yes	Sensible if not too vigorously applied	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00192		No	Whilst there is much of merit contained in the policy, one omission needs to be corrected to properly protect conservation areas across the district. The setting of Conservation Areas is very important to maintaining the integrity and character of each Conservation Area. In the current Local Plan this concept is supported by the inclusion of controls on development adjacent to Conservation Areas. However, these controls have been omitted from the new Local Plan. The following wording should therefore be reinserted into the new Local Plan: "Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area."	<ul style="list-style-type: none"> Omission of setting of a Conservation Area needs to be reinserted. Add following wording "Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area." 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00193		Not Stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.' This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00194		Not Stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.' This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00195		Not stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.' This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00197		Yes	BUT... we need to see these policies applied in real circumstances - the recent refusal of the planning application by Hill at Killingdown Farm was a unanimous decision made on Conservation Area and Heritage Asset grounds (adverse effect on the setting of Listed Buildings) - proof that TRDC stands by its policies. However, this decision is now being appealed against - we look to our councillors to uphold these policies in the event of a Public Enquiry	<ul style="list-style-type: none"> Need to see policies applied in real circumstances; Refusal of application by Hill at Killingdown Farm was unanimous decision made on Conservation Area and Heritage Asset grounds - proof that TRDC stands by its policies. Uphold decision in the appeal. 	Noted	None
P1_00201		No	Shouldn't be any development in these types of areas	<ul style="list-style-type: none"> No development in any of these types of areas. 	Noted	None
P1_00205		No	The scope of protection for Conservation Areas has been limited by the omission in the latest preferred policies consultation document of the clause (paragraph f) previously included under DM3 in the Local Plan. This stated that "Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area". We believe that this paragraph should be reinstated to provide protection for our beautiful Conservation Areas from unsuitable development not only within the Area but in the immediate vicinity. The Conservation Areas are not only sites to be preserved but also were established in the first place in unique surroundings which complement and enhance the importance of retaining their surrounding environment for future generations to appreciate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(f)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan. 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00206		Yes	NA	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00207		Not stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.' This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

P1_00208		Not stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that ‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.’ This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00209		No	but green belt areas are not included in these protections	<ul style="list-style-type: none"> Green Belt areas not included in these protections. 	Noted – there is a separate policy regarding Green Belt areas	None
P1_00210			The setting of a Conservation Area is very important to maintaining its integrity and character. In the current Local Plan this concept is supported by the inclusion of controls on development adjacent to Conservation Areas. However, these controls have been omitted from the new Local Plan and should be reinstated.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00211		Yes	Our historic buildings are very important	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00214		Not stated	Natural England broadly supports the use of sustainable transport options such as walking, cycling, and public transport. We would advise consideration of potential to link these transport options with green infrastructure through green chains and corridors, which in turn would improve access to nature in addition to providing recreational, health and wellbeing benefits for people.	<ul style="list-style-type: none"> Agree with approach. Advise use of sustainable transport options to green infrastructure through green chains and corridors. 	Noted	None
P1_00215		Yes	It is vital to protect our history and heritage for our children and grandchildren.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00216		Not stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that ‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.’ This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00217		Not stated	A clause relating to Conservation Areas previously included under DM3 in the current Local Plan that has been left out in this TRDC preferred policies consultation document. The current Local Plan says that ‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.’ This clause must be reinstated, to protect the numerous conservation areas in and adjacent to Chorleywood, namely Chorleywood Common, Chorleywood Station Estate, Loudwater Estate, Outer Loudwater Estate and Heronsgate.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00218		Yes	No Comments	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00219		No	In addition, they should not promote promiscuity or the breaking of the law or the inference of the same. They should comply with the Advertising Standards authority guidelines	<ul style="list-style-type: none"> Should not promote promiscuity of breaking law or interfere. Should comply with Advertising Standards. 	Noted	None
P1_00220		Not Stated	<p>1. Whilst the Associations support much of the contents of Preferred Policy Option 25, there are two major omissions on the policies relating to Conservation Areas. These are both important. First, the current Local Plan gives clear guidance on when demolition in Conservation Areas should be permitted. It is vital that the new Local Plan also makes this clear to property owners in Conservation Areas, to avoid any confusion and possible enforcement actions. It is suggested that the wording from the existing Local Plan should be included in the new version, as follows:</p> <p><i>“Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that:</i></p> <p><i>The structure to be demolished makes no contribution to the special character or appearance of the area, or;</i></p> <p><i>it can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or;</i></p> <p><i>it can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.</i></p> <p><i>The Council will not normally grant consent for the demolition of a building in a Conservation Area unless planning permission has been given for the redevelopment of the site.”</i></p> <p>2. Second, it is widely recognised that the setting of a Conservation Area is normally very important to maintaining its integrity. This is clearly recognised in the existing Local Plan, but the appropriate policy has been omitted from Preferred Policy</p>	<ul style="list-style-type: none"> Two major omissions from the Local Plan; Current Local Plan gives clear guidance on demolition, but not in this Local Plan; Widely recognised that setting of a Conservation Area is important to maintaining its integrity. Recognised in existing Local Plan, but policy has been omitted from Preferred Policy Option 25 	Noted	<p>Include wording from the current local plan Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that (a) The structure to be demolished makes no contribution to the special character or appearance of the area, or; (b) It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or; (c) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.</p> <p>Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting</p>

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			Option 25. Sub-paragraph (11) could have covered this point, but it is limited to development within the Conservation Area, and not within its setting. Accordingly, it is requested that the following wording should be added : <i>“Permission will not be granted for development outside or near to a Conservation Area if it adversely affects the setting, character, appearance, or public views into or out of that Conservation Area.”</i>			
P1_00222		Yes	No Comments	• No Comment	Noted	None
P1_00223		No	You should decide, if you want to keep listed buildings etc. there should be no exceptions.	• Council should decide, if want to keep listed buildings there should be no exceptions.	Noted	None
P1_00224		Yes	again... yes.... as long as the action matches the words	• Agree with approach, as long as implemented.	Noted	None
P1_00227		No	Demolition should be specifically included to avoid any misunderstanding (even though demolition is development by definition). I have read the report prepared by Jed Griffiths for local residents' associations and support his comments on conservation.	• Demolition should be specifically included to avoid misunderstanding; • Read Jed Griffiths report for local residents and agree with comments.	Noted	Include additional wording re. demolition of heritage assets / within Conservation Areas
P1_00230		Not Stated	1. The policy makes no mention of the importance of historical landscapes in the heritage and historic environment such as ancient lanes, hedgerows, field systems, meadows and water sources such as ponds and springs. These are valued and valuable features and landscapes which need protection. 2. Much more work needs to be done in terms of mapping and protecting the history and archaeology of our area as this could be lost to development.	• Policy makes no reference to importance of historical landscape in the heritage and historic environment; • Need to do more mapping and protecting history and archaeology.	Noted	None
P1_00232		Yes	All Good	• Agree with approach	Noted	None
P1_00233		No	I disagree with that Preferred Policy Option for Heritage and the Historic Environment is the right approach. Point 11.4- Local heritage assets should have been established and made public before we are being asked to agree to any policy. This makes it very difficult to make an informed decision,	• Point 11.4. Local heritage assets should be established and made public before asked to agree to any policy, cannot make an informed decision	Noted	None
P1_00234		No	I disagree with that Preferred Policy Option for Heritage and the Historic Environment is the right approach. Point 11.4- Local heritage assets should have been established and made public before we are being asked to agree to any policy. This makes it very difficult to make an informed decision,	• Point 11.4. Local heritage assets should be established and made public before asked to agree to any policy, cannot make an informed decision	Noted	None
P1_00236t		Yes	Stipulations make sense	• Agree with approach	Noted	None
P1_00240		Yes	Yes	• Agree with approach	Noted	None
P1_00243		No	One omission which needs to be addressed to properly protect conservation areas across the district concerns Development Adjacent to Conservation Areas. The setting of a Conservation Area is very important to maintaining its integrity and character. In the current Local Plan this concept is supported by the inclusion of controls on development adjacent to Conservation Areas. However, these controls have been omitted from the new Local Plan and should be reinstated.	• Development adjacent to conservation areas needs to be addressed. Setting of a Conservation Area is important to maintaining integrity and character, but been omitted from new Local Plan	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00244		Yes	This is fine.	• Agree with approach	Noted	None
P1_00252		Yes	The heritage and historic environment is vital to preserve and maintain. Having a thoughtless and callous attitude to this risks losing what is good and dear to local areas. Having a policy that safeguards this is vital and proper.	• Agree with approach. Having a thoughtless and callous attitude to this risk what is good and important to local areas.	Noted	None
P1_00256		Yes	Seems reasonable	• Agree with approach	Noted	None
P1_00259		Yes	The setting of Conservation Areas is very important to maintaining the integrity and character of each Conservation Area.	• Agree with approach	Noted	None
P1_00261		No	There should be some definition of non-designated heritage assets as these go beyond local listing	• Need a definition of non-designated heritage assets that go beyond local listing.	Noted	None
P1_00262		Yes	Fine	• Agree with approach	Noted	None
P1_00265		Yes	I support much of the contents of Preferred Policy Option 25 but there are some omissions relating to Conservation Areas	• Agree with approach but some omissions relating to Conservation Area.	Noted	None
P1_00271		Yes	Seems sensible	• Agree with approach	Noted	None
P1_00283		Not Stated	In Preferred Policy Option 25 on Heritage and the Historic Environment, we would like to see a mention of the importance of ancient and veteran trees, which are often of great historic and cultural significance and are often a major feature of historic parks and gardens. Trees could also be referred to in Preferred Policy Option 23, as they can often be very useful in creating high quality public realm and hence in shaping places where people want to live and work. There is, for example, evidence that presence of trees in a street can enhance house prices by up to 8% by creating neighborhoods which people see as desirable for living and bringing up their families. Street trees have even been shown to reduce traffic speeds, thus creating safer neighborhoods for children, as well as shielding people's homes from air pollution caused by traffic.	• Need to mention importance of ancient/ veteran trees; • Trees could be referenced in Preferred Option 23; • Is evidence of trees in street can enhance house prices by up to 8%, can also reduce speeding.	Noted	None
P1_00285		No	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views	• Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting.

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

			in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.			
P1_00286		No	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, ‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	None Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00288		No	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, ‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00289		No	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, ‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00296		No	Whilst there is much of merit contained in the policy, one omission needs to be corrected to properly protect conservation areas across the district: <u>Development Adjacent to Conservation Areas</u> The setting of Conservation Areas is very important to maintaining the integrity and character of each Conservation Area. In the current Local Plan this concept is supported by the inclusion of controls on development adjacent to Conservation Areas. However, these controls have been omitted from the new Local Plan. We therefore request that the following wording be re-inserted into the new Local Plan: <i>"Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area."</i>	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00300		Not Stated	Please re-insert the following wording: “Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.”	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00301		Not Stated	The Chilterns Conservation Board supports the approach taken to the historic environment in the local plan. On a very technical note, there appears to be an issue with the plan’s treatment of “non-designated heritage assets” with regard to “archaeology” in para (2) of the policy, plus paras 11.32 and 11.60. Strictly speaking, the term “non-designated heritage assets” (NDHAs) does not mean “heritage assets that have not been designated”, but, somewhat counter-intuitively, refers to assets that are not formally designated under national or international legislation, but <i>have been specifically identified by a plan-making body</i> through processes such as a local heritage list, local or neighbourhood plan, conservation area appraisal or planning application. Assets on your list of Locally Important Buildings will be NDHAs, as will the unregistered parks and gardens (assuming these are listed in the plan and/or shown on the policies map. However, as far as we can tell, the “19 sites of known archaeological significance” are only recorded on the Hertfordshire HER, and so may not technically be NDHAs. This may be remedied by listing those sites in the local plan and/or showing them on the policies map. We recommend referring to Historic England’s advice note 7 (updated in January 2021).	<ul style="list-style-type: none"> Appears to be an issue with non-designated heritage assets and archaeology; Strictly speaking, the term “non-designated heritage assets” (NDHAs) does not mean “heritage assets that have not been designated”, but, somewhat counter-intuitively; 19 sites of known archaeological significance” are only recorded on the Hertfordshire HER, and may not technically be NDHAs. May be remedied by listing those sites in the local plan. Recommend referring to Historic England’s advice note 7. 	Noted	None
P2_00962		No	The objection to this issue is the removal of wording previously included under Local Plan Policy DM3. To ensure that the effect of new developments on Conservation Areas is properly considered in accordance with national advice, the previously included words under the option for Heritage and the Historic Environment paragraph f stating that <i>‘Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.’ should be reinstated.</i>	<ul style="list-style-type: none"> Reinstate policy as written in the Local Plan 	Elements of Paragraph f have been included in the Plan, albeit have been ‘positively prepared’ in line with guidance of the NPPF. For example, Point 2 of Preferred Policy Option 25 states “Protecting and enhancing the wide range of historic and cultural assets which contribute to the character and identity of the District” which includes Conservation Areas in the first bullet point.	None
Q26. Should we have considered alternative options?						
P1_00014		Yes	As before	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00017		Yes	See above.	<ul style="list-style-type: none"> Only if enforced 	Noted	None

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

P1_00020		Yes	N/A	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00023		Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00024		Yes	Demolishing Listed Buildings should not be granted under any circumstances.	<ul style="list-style-type: none"> Demolishing listed buildings should not be allowed under any circumstances. 	Noted	None
P1_00025		Yes	Should not take up the full length of Oxhey lane	<ul style="list-style-type: none"> Should not take up full length of Oxhey Lane 	Noted	None
P1_00040		Yes	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> Do not develop Green 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 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		Yes	What are others doing?	<ul style="list-style-type: none"> Review what other authorities are doing. 	Noted	None
P1_00043		Yes	Regular assessment & addition to locally important buildings list	<ul style="list-style-type: none"> Regular assessment and addition to locally important buildings 	Noted	None
P1_00057		Yes	Use areas that would not endanger protected or endangered species, or harm diverse wildlife,	<ul style="list-style-type: none"> Use areas that would not harm endangered species and diverse wildlife. 	Noted	None
P1_00064		Yes	Listed Buildings - if unique should be preserved. But if there are 100s of these types of houses, alterations should be permitted	<ul style="list-style-type: none"> If listed buildings are unique should be preserved 	Noted	None
P1_00068		Yes	You should try employing people with common sense – hard to come by I know - particularly in those that wish to work for a council but hey ho.	<ul style="list-style-type: none"> Employ experts to review 	Noted	None
P1_00084		Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00100		Yes	Please see previous comments - Reintroduce to the Proposed New Local Plan the current Local Plan policy to refuse planning permission for developments that adversely affect the setting, character, appearance of or views in to or out of that Conservation Area as is required under NPPF - Section 16. "Conserving and enhancing the historic environment" Paragraphs 198 - 208 "Considering potential impacts"	<ul style="list-style-type: none"> Reintroduce policy from current local plan into new local plan policy to refuse permission for developments that adversely affect the setting, character, appearance of or views in to or out of that Conservation Area. 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00106		Yes	Go it build somewhere where residents like it. Not here. People move into green areas because they like green, not because they want it full of new housing.	<ul style="list-style-type: none"> Develop where residents like it to be built, residents move here because of the Green area, not full of houses. 	Noted	None
P1_00111		No	Please see previous comment.	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00119		Yes	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Land is sanctuary for wildlife 	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_00121		No	Forget the greenbelt - find alternatives	<ul style="list-style-type: none"> Find alternatives to the Green Belt 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to	None

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

					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_00132		Yes	need mitigate against high costs	<ul style="list-style-type: none"> Mitigate against high costs 	Noted	None
P1_00142		Yes	.	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00144		Yes	We will have to sacrifice some visual aspects to high rise, if we want to preserve green belt	<ul style="list-style-type: none"> Will have some visual aspects to high rise and preserve green belt 	Noted	None
P1_00147		Yes	encourage more secure storage of bikes and other modes of transport at stations	<ul style="list-style-type: none"> More cycle storage and other transport modes at stations 	Noted	None
P1_00170		Yes	Jesus allegedly said "For where two or three are gathered in my name, there am I among them" (Matthew 18:18"20). This does not state that they have to gather in a dedicated Church, therefore the multi-use of any building that receives TRDC support should be mandatory. Whilst it may be argued that the use of churches for indoor football may damage its stained glass windows, table tennis or badminton tournaments for locals could be used to build community spirit.	<ul style="list-style-type: none"> Multi-use of any building that receives TRDC support should be mandatory for community use. 	Noted	None
P1_00201		Yes	Avoiding development in these areas completely	<ul style="list-style-type: none"> Avoid development in these areas completely 	Noted	None
P1_00209		Yes	It is for councillors to consider sensible, alternative options and proposal a range of those options	<ul style="list-style-type: none"> For Councillors to consider other options 	Noted	None
P1_00215		Yes	Reinstatement of some of our historical sites and structures. I.e. the gates of Cassiobury. So many people want them back and say that they are saddened they went in the first place. We should ensure that the future generations don't experience this and they are surrounded by our history and Heritage buildings.	<ul style="list-style-type: none"> Reinstatement of historic sites and structures i.e. Gates of Cassiobury 	Noted	None
P1_00219		Yes	As above	<ul style="list-style-type: none"> Should not promote promiscuity of breaking law or interfere. Should comply with Advertising Standards. 	Noted	None
P1_00259		Yes	Please ensure coding is included: "Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area."	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00265		Yes	It is vital that the new plan makes this clear to property owners in Conservation Areas, to avoid any confusion and possible enforcement actions. There is an existing issue where there are policies but both owners and unfortunately the planning authority seem to feel able to ignore them and enforcement measures are not always taken. It is suggested that the wording from the existing Local Plan should be included the following areas Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that: The structure to be demolished makes no contribution to the special character or appearance of the area, or; it can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, it can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area. The Council will not normally grant consent for the demolition of a building in a Conservation Area unless planning permission has been given for the redevelopment of the site. Permission will not be granted for development outside or near to a Conservation Area if it adversely affects the setting, character, appearance, or public views into or out of that Conservation Area	<ul style="list-style-type: none"> Existing issue where there are policies but both owners and unfortunately the planning authority seem to feel able to ignore them and enforcement measures are not always taken. It; Include wording omitted from this plan that is in the current Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting

REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Heritage and the Historic Environment

P1_00285		Yes	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00286		Yes	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00288		No	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00289		No	A clause relating to Conservation Areas previously included under DM3 in the Local Plan that has been left out in the latest TRDC preferred policies consultation document. Under the option for Heritage and the Historic Environment, paragraph f) has been omitted, 'Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area. This clause should be included in the new plan as it protects the important heritage assets such as Heronsgate Conservation Area under the councils care.	<ul style="list-style-type: none"> Current Local Plan contains a policy on Conservation Areas (DM3(c)). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting
P1_00294		Not Stated	Conservation areas need to be further protected to ensure that permission is not granted on sites outside the conservation areas that would have a material impact on their setting. Chorleywood is a hilly place and sight lines from Conservation areas are consequently lengthened and this needs to be reflected in development controls.	<ul style="list-style-type: none"> Conservation areas need to be further protected to ensure that permission is not granted on sites outside the conservation areas that would have a material impact on their setting. 	Noted	Consider adding wording relating to development adjacent to Conservation Areas which may affect the setting