

REPRESENTATIONS RECIEVED

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	PROPOSED ACTION
Q24. Do you think the Preferred Local Distinctiveness and Place Shaping is the right approach?						
SC_00002_Historic England	Historic England		<p>Local distinctiveness and Place Shaping</p> <p>As above we recommended that the policy be expanded to refer to the role the historic environment plays in understanding local distinctiveness and place shaping. We recommend that bullet one is amended to read “....design that responds to distinctive local character (including the built and historic environment, and landscape character)....” and the fourth bullet point we recommend this amendment, “...designed to respond to locally distinct patterns of development, including the built and historic environment, and landscape setting...”</p>	<ul style="list-style-type: none">Suggests policy should be expanded to specifically refer to the historic environment and suggests changes to bullet point 1 and 4	<ul style="list-style-type: none">Agreed. Policy changes to 4) of policy only required	<p>Additional wording to be added (4) All new development should be designed to respond to locally distinct patterns of development and character, including landscape setting ‘and the historic environment’. Proposals will need to take account of local design guidance including that contained within Conservation Area Appraisals, Neighbourhood Plans and Supplementary Planning Documents to conserve or enhance the character, amenities and quality of an area.</p>
SC_P1_00007_Sport England	Sport England	No	<p>In view of the importance attached to planning/designing places to encourage healthy lives in strategic objective 15 of the Local Plan and the focus in policy option 11 on promoting healthy communities through providing the necessary infrastructure to encourage physical exercise, it is surprising that this policy does not have a section specifically on promoting healthier/active communities through design especially as the role of good design in influencing health outcomes is specifically referenced in paragraph 11.7 which supports this policy option. Such a section would be expected to include the principles that developments should incorporate into the design of development to encourage active lifestyles such as connected walking and cycle routes, co-located community facilities, multi-functional open space and active buildings. These are in addition to some of the principles already covered in the policy under different themes that encourage activity which it would not be necessary to repeat (e.g. parts 10, 12, 15, 20, 21 and 22). To support this, specific reference could be made in the policy or reasoned justification to Sport England/Public Health England’s Active Design guidance https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design which sets out principles for encouraging physical activity through the design of development. Such an amendment would also provide greater consistency with paragraph 91(c) of the NPPF.</p>	<ul style="list-style-type: none">Requests that policy includes a section on promoting healthier/active communities through design as specifically referenced in the supporting text at paragraph 11.7. Section should include the principles that developments should incorporate into the design of development to encourage active lifestyles such as connected walking and cycle routes, co-located community facilities, multi-functional open space and active buildings. Principles already covered in the policy (e.g. parts 10,12,15,20,21 and 22) do not need to be repeated.That reference to Sport England’s Active Design Guidance should be referred to in the supporting text.	<p>Preferred Policy 11 Health and Wellbeing states: (1) All development shall be designed to maximise the impact it can make to promoting healthy Communities and reducing health inequalities. In particular, regard shall be had to providing the necessary infrastructure to encourage physical exercise and health, including accessible open space, vegetation and landscaping, sport and recreation facilities, cultural facilities and safe, well promoted, walking and cycling routes.</p> <p>Therefore there is no need to repeat this in Local Distinctiveness and Place Shaping policy</p> <p>Policy also refers to the HCC Public Health Department’s Hertfordshire Health and Wellbeing Planning Guidance Document (2017) to aid local authorities and developers in the delivery of healthy development and communities</p> <p>Wording can be added to supporting text of the Health and Wellbeing Policy to refer to Sport England’s Active Design Guidance</p>	<p>Additional wording to be added to Policy 11 Health and Wellbeing:</p> <p>After 6.10 and before 6.11:</p> <p>Further guidance is also available in Sport England’s ‘Active Design Guidance available at : https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p>
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council		<p>Croxley Green Parish Council considers the proposed policy seems to be focussed on new development. Extensions and adaptations, including those currently allowed as permitted development, can individually and cumulatively change the character of an area. The policy should be extended to include extensions and adaptations. This policy should actively support any local character areas and especially those developed in Neighbourhood Plans. While the wording appears appropriate, it is clear that this is insufficient. What will be done to prevent places like Croxley Green becoming characterless, bland and undifferentiated like so many other places in the UK? Creation of place should be central to Three Rivers planning. ‘Respecting local distinctiveness’ (4.2n) is reactive – the Local Plan should set out the ambition for ongoing creation of local character and differentiation between settlements. We endorse the comments from Jed Griffiths’ statement about local design guides and draw the Council’s attention to the approach in the Croxley Green Neighbourhood Plan. We support his suggestion for Local Design Guides produced in collaboration with other authorities. We endorse his comments on the detailed schedule in Policy 23 at (7), (8), (9) & (10), (11) and (15).</p>	<ul style="list-style-type: none">The policy should be extended to include extensions and adaptations. This policy should actively support any local character areas and especially those developed in Neighbourhood Plans.Local Design Guides produced in collaboration with other authorities.Three Rivers District Council should provide a simple design guide for those planning to extend their properties, whether under permitted development rights or with planning permission, to encourage more sensitive and considerate design.	<p>Noted. TRDC has completed a Heritage Assessment and this will inform local evidence. The Council has also undertaken a programme of character area appraisals which support the intensions of this policy.</p>	<p>None</p>

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			<p>In particular we are concerned about the effect of ground floor extensions on neighbouring properties, especially in some of the more historic areas of development and in some of the more recent areas, both of which have higher housing densities and limited space for extending properties without adverse effects on neighbouring properties. We consider Three Rivers District Council should provide a simple design guide for those planning to extend their properties, whether under permitted development rights or with planning permission, to encourage more sensitive and considerate design.</p>			
SC_00024_Abbots Langley Parish Council	Abbots Langley Parish Council	No	<p>Do we have a character document to support this, what is the local character? The Essex Design Guide, threw down this gauntlet of telling developers what was expected a number of years ago and since then, many local authorities have adopted similar documents, this policy, as it stands, expects developers to explain to the council, why his buildings are in character, and I have yet to see any of the recent additions to the village which make me feel that they represent the character of the area. Without such a document the council has no say on character!</p>	<ul style="list-style-type: none">No character document to support this	<p>Noted. The Council has undertaken a programme of character area appraisals which support the intensions of this policy.</p> <p>The Building Futures sustainable development initiative provides the Hertfordshire Design Review Service. This service is undergoing extensive review in response to reforms that are proposed to the planning system and broadening the range of services it can provide to support the borough in support of the planning process.</p>	No action
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure	Yes	<p>Preferred Policy Option 23, Local Distinctiveness and Place Making</p> <p>Whilst HCC agrees with the thrust of this policy and the strong steer towards good design, it is believed that it needs to correlate with the National Design Guide and reference the 10 characteristics identified in the NDG. It is expected to see a reference to design coding for major developments and strategic allocations.</p> <p>It is considered that paragraph (1) should be amended as follows: “All new development is required to achieve high quality design that responds to distinctive local character (including landscape <u>and townscape character</u>) of the area in which it is set and contribute to a strong sense of place. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote wellbeing.”</p> <p>Paragraph 13 should be clear in stating that landscaping includes both soft and hard spaces and features. It should also promote ‘a landscape led’ approach to planning, with adequate provision of the landscape from the outset (it should not be the space left over) and require a fully integrated approach to green infrastructure networks, public open space networks, surface water management systems, and movement (people and/or wildlife) networks. Landscape schemes, hard and soft landscape specifications and construction details, planting schedules and plans, and management and maintenance plans (for a min 5-year aftercare period) should also be required.</p> <p>Minerals and Waste Planning. The county council supports the provision of sustainable design and the requirement for development proposals to take opportunities to reduce waste within paragraph 17.</p> <p>With regard to the need to undertake a design review, the NPPF states that local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include a design advice and review arrangements (NPPF paragraph 133). The Building Futures sustainable development initiative provides the Hertfordshire Design Review Service. This service is undergoing extensive review in response to reforms that are proposed to the planning system and broadening the range of services it can provide to support the borough in support of the planning process</p>	<ul style="list-style-type: none">Supports general approach, it is believed that it needs to correlate with the National Design Guide and reference the 10 characteristics identified in the NDG. It is expected to see a reference to design coding for major developments and strategic allocations. Wording to be amended within Paragraph 1.Paragraph 13 should be clear in stating that landscaping includes both soft and hard spaces and features. It should also promote ‘a landscape led’ approach to planning.With regard to the need to undertake a design review, , the NPPF states that local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include a design advice and review arrangements (NPPF paragraph 133). The Building Futures sustainable development initiative provides the Hertfordshire Design Review Service.	<p>Noted. Reference to the National Design Guide to be added</p> <p>Agree amendments</p> <p>Noted. Reference to be made to the Building Futures sustainable development initiative provides the Hertfordshire Design Review Service. This service is undergoing extensive review in response to reforms that are proposed to the planning system and broadening the range of services it can provide to support the borough in support of the planning process.</p>	<p>It is considered that paragraph (1) should be amended as follows: “All new development is required to achieve high quality design that responds to distinctive local character (including landscape <u>and townscape character</u>) of the area in which it is set and contribute to a strong sense of place. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote wellbeing.”</p> <p>Paragraph 13 should be clear in stating that landscaping includes both soft and hard spaces and features. It should also promote ‘a landscape led’ approach to planning, with adequate provision of the landscape from the outset (it should not be the space left over) and require a fully integrated approach to green infrastructure networks, public open space networks, surface water management systems, and movement (people and/or wildlife) networks. Landscape schemes, hard and soft landscape specifications and construction details, planting schedules and plans, and management and maintenance plans (for a min 5-year aftercare period) should also be required.</p>
PL_00002_A CFS8b	ROK Planning on behalf of Woolbro Group		<p><i>Question 24 - Do you think the Preferred Policy Option for Local Distinctiveness and Place Shaping is the right approach? If not please identify how the option could be changed. Should we have considered alternative options? If yes, please explain.</i></p> <p>1.43 It is considered that this Preferred Policy Option constitutes the right approach in general, with the policy setting the parameters and referring to Appendix 1 for specific requirements.</p>	<ul style="list-style-type: none">Right approach in general. Policy sets parameters and Appendix 1 sets specific requirements.	<ul style="list-style-type: none">Noted.	No action
	210818 - TRDC Reg					

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	18 - ROK OBO WOOLBRO FINAL					
PL_00 014_C FS22	ROK Planning on behalf of landowner Regulation 18 representat ion		It is considered that this preferred policy option constitutes the right approach in principle, with the policy setting the parameters and referring to draft Plan Appendix 1 for specific requirements.	<ul style="list-style-type: none">Right approach in general. Policy sets parameters and Appendix 1 sets specific requirements.	<ul style="list-style-type: none">Noted.	No action
P1_00 005_		Yes	Nothing to add	<ul style="list-style-type: none">No Comment	Noted	None
P1_00 006_			Vitally important to conserve the character of the area and stops un necessary land grab and unsightly extensions to existing buildings.	<ul style="list-style-type: none">Conserve the character of the area and stop unnecessary land grab	Noted	None
P1_00 014_		Yes	Makes logical sense. Let's see what happens in practice.	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 017_		No	Only if you adhere to your principals. Which you didnt in South Oxley	<ul style="list-style-type: none">Agree with approach only if adhered to the principles. Did not do this in South Oxley.	Noted	None
P1_00 019_		Yes		<ul style="list-style-type: none">No Comment	Noted	None
P1_00 020_		Yes	Makes Sense	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 023_		Yes	Ok	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 024_		Yes	Consideration should be given to the area and what makes it distinctive. A village should remain a village so it retains both it's character and sense of identity. Expanding villages affects community cohesion	<ul style="list-style-type: none">Consider what makes a place distinctive. Expanding villages affects community cohesion.	Noted	None
P1_00 025_		No	Disagree appropriate facilities are being provided	<ul style="list-style-type: none">Do not agree appropriate facilities are being provided.	Noted	None
P1_00 026_		Yes	Clear Policy	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 027_		Not Spe cifie d	While the wording appears appropriate, it is clear that this is insufficient. What will be done to prevent our places like Croxley, Abbots Langley, etc becoming characterless, bland and undifferentiated like so many other places in the UK? Creation of place should be central to Three Rivers planning. 'Respecting local distinctiveness' (4.2n) is reactive – the Local Plan should set out the ambition for ongoing creation of local character.	<ul style="list-style-type: none">What will be done to prevent places like Croxley, Abbots Langley etc from becoming characterless;Make place creation central to Local Plan. 'Respecting local distinctiveness' (4.2n) is reactive but not ambitious.	Noted	None
P1_00 028_		Yes	Ok	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 032_		Yes	It's the right approach	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 033_		Yes	It should also consider the parking facilities for visitors to the area, as this may lead to inconvenience and congestion to the development site	<ul style="list-style-type: none">Consider parking facilities for visitors to the area	Noted	None
P1_00 034_		Yes	No Comment	<ul style="list-style-type: none">No Objection	Noted	None
P1_00 038_		Yes	The character of the town and local area needs protecting and sensitively developed.	<ul style="list-style-type: none">Support	Noted	None
P1_00 040_		No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none">No development of Green Belt or Greenfield.	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is	None

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					insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	
P1_00 041_		Yes		<ul style="list-style-type: none">No Comment	Noted	None
P1_00 046_		Yes	Design, character and security are of major importance	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 047_		Yes	This policy is right.	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 048_		Yes	No Comment	<ul style="list-style-type: none">No Comment	Noted	None
P1_00 049_		Yes	Open spaces are key to health and wellbeing	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 053_		Yes	Yes	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 054_		Yes	Agree	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 055_		Yes	This seems to consider the local needs	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 056_		Yes	WITH RESERVATIONS: Paras 11.5 (5) and (6): 'Take account of surrounding area' is not strong enough nor specific enough to prevent developments which are over height or over-dense, particularly when elsewhere the document appears to set a target modelled on Rickmansworth Town Centre. Para 11.5 (21) Parking Provision. This should be afforded a higher profile in the document, with its own Policy Option(s) and Question(s).	<ul style="list-style-type: none">Agree with approach but 'take account of surrounding area' is not strong enough nor specific enough to prevent overdevelopment	Noted	None
P1_00 057_		Yes	Access to new houses would impact on traffic and existing residents.	<ul style="list-style-type: none">Agree with approach but access to new houses would impact residents and traffic.	Noted	None
P1_00 063_		Yes	Agree	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 064_		No	Planning rules insist on the same set of mundane housing stock - mock Georgian. Provided the housing meets sustainability guidelines and affordable housing, "non-conventional" designs should be permitted,	<ul style="list-style-type: none">Provided housing meets sustainability and affordable housing, "non-conventional" designs should be allowed,	Noted	None
P1_00 065_		Yes	Giving people opportunities for green travel but making it easy, safe & clear.	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 066_		Yes	Agree	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 068_		Yes	Except for the ridiculous phrase "place shaping" - who the hell thought that one up? The section still seems overly geared to letting development through rather than properly governing what is permissible.	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 069_		No		<ul style="list-style-type: none">Do not agree with approach but no reason given.	Noted	None
P1_00 071_		Yes	This appears to cover the key areas.	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 074_			Yes but it should also apply to conversions and demolish / rebuild, some of these are simply ghastly.	<ul style="list-style-type: none">Agree with approach but should apply to conversions, demolition and rebuild, some areas are ghastly.	Noted	None
P1_00 076_		No	Point 8 completely undermines points 1-7, making the whole policy meaningless up to this point. Remove point 8 please. On points 18 and 19 about security, please ensure there are no gated communities - these are anti-social and do not promote cohesive communities.	<ul style="list-style-type: none">Point 8 underlines points 1-7, delete it;Security - Points 18-19 ensure there's no gated communities - are anti-social	Noted	None
P1_00 078_		Yes	Reasonable requirements.	<ul style="list-style-type: none">Agree with approach	Noted	None

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P1_00 080_		No	The local character is green open areas and not over populated dysfunctional infrastructure	<ul style="list-style-type: none"> Will affect local character and not over populated dysfunctional infrastructure. 	Noted	None
P1_00 084_		Yes	Any development should be in keeping with the area and existing houses.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 088_		Yes	Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 089_		Yes	Any development needs to fit in with Chorleywood existing 'village' type feel and not make it into a 'commuter' belt for those travelling to London. It's an affluent area and one of Outstanding Natural Beauty.	<ul style="list-style-type: none"> Agree with approach, but fit in with existing character of village feel 	Noted	None
P1_00 096_		No	All development should conform to the character of the majority of existing housing here in terms of cosmetic appearance, size, land allocation, spacing, road width, etc. No newer development to date has, frankly, simply in order for developers to make more money.	<ul style="list-style-type: none"> Development should conform with character of majority of housing, recent new development has not conformed with the character. 	Noted	None
P1_00 097_		Yes	Important to maintain the character of different places.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 098_		Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 099_		Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 102_		Yes	Developments should reflect their local character and enhance it, not have any negative impact on it. Good design is critical.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 106_		No	People move into green areas, because they like green, not because they want it full of ugly flats.	<ul style="list-style-type: none"> People move into green areas not full of ugly flats 	Noted	None
P1_00 107_		Yes	..but it will be less of a problem if keep development to only what's absolutely necessary	<ul style="list-style-type: none"> Agree with approach, with be less of a problem if keeping development when it is absolutely necessary. 	Noted	None
P1_00 108_		Yes	who knows	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 110_		No	Previous responses refer to the importance of countryside and rural life in place-making and this is particularly significant with regard to the distinctiveness and protection of villages, including the prevention of coalescence, and the crucial role of open space between settlements.	<ul style="list-style-type: none"> Need to prevent coalescence between villages and protect open space between settlements. 	Noted	None
P1_00 112_		Yes	I agree with the plan	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 113_		Yes	No reason	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 114_		No		<ul style="list-style-type: none"> Do not agree with approach but no reason given 	Noted	None
P1_00 116_		Yes	I agree with the policy as stated.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 117_		Yes	Fine as is	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 119_		Yes	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Land is sanctuary for wildlife 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00 120_		Yes	Seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 123_		Yes	If this could be implemented, it would be terrific. Sadly too much of the development in Three Rivers has been dull and unworthy. Keep up the good work if you can	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 127_		No	Your development plans kill the character and integrity of Kings Langley and Bedmond	<ul style="list-style-type: none"> Development will ruin character of Kings Langley and Bedmond 	Noted	None
P1_00 130_		No	Local character is fine as it	<ul style="list-style-type: none"> Local character fine as it is. 	Noted	None
P1_00 131_		No	No mention of electric car recharging points. 11) 'Garden Space' comment at odds with previous 'high building density' statements!	<ul style="list-style-type: none"> No mention of electric charging points 	Noted	None
P1_00 132_		Yes	balanced approach is best	<ul style="list-style-type: none"> Agree with approach 	Noted	None

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P1_00 135_		No	The Council should explicitly support the local character areas identified within Neighbourhood Plans.	<ul style="list-style-type: none">Support the local character identified in Neighbourhood Plans	Noted	None
P1_00 137_		No	One of the fundamental problems with development is the ratio of cars to dwellings which then causes a problem of parking, increased pollution which is bad for the environment! Saying that local people will use alternative transport is an idealistic answer to this problem, taking into consideration both cost and time	<ul style="list-style-type: none">Cars to dwellings ratio will lead to parking and pollution problems;Local people using public transport is an idealistic, not realistic, solution.	Noted	None
P1_00 140_		Yes	If adhered to, then important points.	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 142_		No		<ul style="list-style-type: none">Do not agree with approach but no reasons given	Noted	None
P1_00 144_		No	We need to sacrifice the visual impact, limited where possible, of high rise, to save green belt	<ul style="list-style-type: none">Limited sacrifice of visual impact of high rise to save green belt	Noted	None
P1_00 147_		No	We should look to challenge designs to make sure they are delivering what residents need for their life	<ul style="list-style-type: none">Challenge designs to ensure they deliver what residents needs	Noted	None
P1_00 148_		Yes	Balance is important	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 150_		No	Generally, the Preferred Policy Option reflects the aims of the NPPF 2021 for the creation of high quality buildings and places. In the changes to the NPPF, the Government have clearly endorsed the recommendations of the Building Better, Building Beautiful Commission (BBBBC), including a changed social objective (paragraph 8b of the NPPF) to achieve well-designed, beautiful, and safe places. There is a new test (paragraph 133) to ensure that all development should be well-designed. In support of the notion of ‘building beautiful’, the Government has also published a new National Model Design Code and has strengthened the relevant parts of Planning Practice Guidance. Local authorities are advised to prepare Local Design Codes in order to deliver better-quality development which reflects local distinctiveness. In the light of these changes, the Council need to make further adjustments to the policy wording before submission of the Local Plan.	<ul style="list-style-type: none">Changes reflect changes in the NPPF 2021;Government have endorsed Building Better Commission to achieve well-designed, beautiful and safe places;Government have published new National Modal Design Code, the Local Plan needs to be amended to reflect these changes.	Noted	None
P1_00 151_		Yes	Good design assists community safety and cohesion,	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 154_T hree Rivers Joint Reside nts Associ ation	Three Rivers Joint Residents Association	Not Stat ed	<p>38. The Associations wish to record their support in principle for this set of policies and the design criteria in Appendix 1, although there are some comments on the detailed wording, which are set out below. Generally, the Preferred Policy Option reflects the aims of the NPPF 2021 for the creation of high quality buildings and places. In the changes to the NPPF, the Government have clearly endorsed the recommendations of the Building Better, Building Beautiful Commission (BBBBC), including a changed social objective (paragraph 8b of the NPPF) to achieve “well-designed, beautiful, and safe places.” There is a new test (paragraph 133) to ensure that all development should be well-designed. In support of the notion of “building beautiful”, the Government has also published a new National Model Design Code and has strengthened the relevant parts of Planning Practice Guidance. Local authorities are advised to prepare Local Design Codes in order to deliver better-quality development which reflects local distinctiveness. In the light of these changes, the Council will clearly need to make further adjustments to the policy wording before submission of the Local Plan.</p> <p>39. In view of the Government’s emerging support for Local Design Codes, it is suggested that the Council should consider the preparation of a stand-alone Design Code for Three Rivers, or, in collaboration with other authorities, for South West Hertfordshire. This would be fully illustrated and would supersede the written criteria set out in Appendix 1. The role of Neighbourhood Plans in addressing these issues should also be acknowledged in the text of the Local Plan.</p> <p>40. The following comments are offered on the detailed schedule in Preferred Policy Option 23:</p> <p>(7) A requirement for materials to be sympathetic to the local character and context should be added.</p> <p>(8) The wording should be re-phrased to make clear that this provision will only apply in the case of large-scale developments, which are not subordinate to the local area. The reference to density should be removed.</p> <p>(9) and (10) an additional policy should be inserted, requiring new developments to connect safely and easily to local facilities and services both for pedestrians and cyclists.</p> <p>(11) In line 2, the policy should be re-phrased to include “social” as well as “economic “aspects. The term “suitable access” is open to interpretation and needs to be clearly defined in the supporting text.</p> <p>(15) Whilst it is accepted that proper lighting is key for successful new places, the policy should also make the point that the effects of light pollution on surrounding areas should be controlled.</p> <p>41. With regards to Appendix 1 Design Criteria, the Associations have the following detailed comments: <input type="checkbox"/> Daylight, Sunlight, and Outlook As written, paragraph 2 does not make sense. The second sentence should be re-written, to read “All dwellings should provide for direct</p>	<ul style="list-style-type: none">Agree in principle with Appendix 1;Changes reflect changes in the NPPF 2021;Government have endorsed Building Better Commission to achieve well-designed, beautiful and safe places;Government have published new National Modal Design Code, the Local Plan needs to be amended to reflect these changes;With emerging Local Design Codes, suggested Council should consider preparation of a standalone Design Code for Three Rivers;Regarding schedule in Preferred Option 23, make the following – requirement for materials to be sympathetic to the local character;Re-phrase wording to make clear provision will only apply to large scale developments;Additional policy should be inserted requiring new developments to connect safely and easily via pedestrian and cycling links;Reword policy to include ‘social’ and ‘economic’ aspects;Make reference to light pollution being controlled;Regarding Appendix 1, rewords second sentence in Paragraph 2 on Daylight, Sunlight and Outlook;Ensure 45 degree splay line is applied to prevent further harm to amenity of residential properties;Residential amenity space – No definition of the precise requirements for open space - no standard defined for the amenity space required for a one-bed dwelling;Clear definition of winter gardens is required.	<ul style="list-style-type: none">NotedWhere other policies throughout the plan support cycle and pedestrian routes, PPO26 ‘Sustainable Transport and Travel’ policy 4(a) encourages provision for high quality and safe pedestrian and cycle provision and 5(d) promotes wider integration of pedestrian and cycle routes.Where other policies through the plan address pollution, PPO17 Ground Conditions, Contamination and Pollution address minimising and permanently mitigating various forms of pollution (including light pollution).Comments addressing Appendix 1 and not PPO23.	<p>Change policy wording PPO23 (11) from ‘economic success’ to ‘social value’.</p> <p>Include in policy wording for materials to be sympathetic to local character.</p> <p>Include in policy wording for proposals to take account of the local design and guidance identified with Neighbourhood Plan Character Areas, where available.</p> <p>Comments addressing Appendix 1 to be reviewed accordingly.</p>

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			daylight to enter habitable rooms for a reasonable period of the day. Living rooms, kitchens, dining rooms should preferably receive direct sunlight.” □ 45 Degree Splay Line Whilst this is a reduction on the current degree of protection offered, it appears that the revised policy does make sense and is easy to understand. To reflect the change, however, it is vital that the policy be strictly applied to prevent further harm to the amenity of residential properties.” □ Residential Amenity Space In respect of the first sentence, there is no definition in the Appendix or elsewhere of the precise requirements for open space. It is essential that this be defined and subject to consultation before the submission draft of the Local Plan is completed. There is no standard defined for the amenity space required for a one-bed dwelling – this is a major omission. A clear definition of “winter gardens” is also required.			
P1_00 155_		Yes	The proposals cover aspects of aesthetics, look and character but also access for those with mobility issues, so think the scope of the proposals is inclusive and well thought through	<ul style="list-style-type: none"> Agree with approach; Proposals cover aspects of aesthetics, look and character but also those with mobility issues. 	Noted	None
P1_00 162_		Yes	This seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 163_		Yes	For the reasons you give	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 166_		Yes	N/A	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 167_		Not Stat ed	TRDC needs to take a strong lead on this topic and spell out the requirements that developers are obliged to follow.	<ul style="list-style-type: none"> TRDC need to take a strong lead and spell out requirements developers need to follow. 	Noted	None
P1_00 170_		Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00 174_		Yes	Agree with this approach but could these requirements extend to permitted development so that extensions etc. are done sympathetically to the areas they occur in?	<ul style="list-style-type: none"> Agree with approach; Extend requirements to permitted development so that extensions etc are done sympathetically. 	Noted	None
P1_00 181_C hiltern Societ y	Chiltern Society	Not Spe cifie d	11.2 - How do you quantify “high quality and sustainable design” what controls this and who makes the decisions, are they qualified? 11.4 and 11.5 both cite “good design” but nowhere is this quantified or is there any suggestion of how it would be measured and evaluated. This broadly covers what we would expect but we are concerned at the method of measuring quality. There is no indication of the personnel or qualifications of those who are to make these judgements and, in our experience, poor decision making ensues form under informed and unqualified personnel.	<ul style="list-style-type: none"> 11.2 – Who determines high quality and sustainable design; 11.4 and 11.5 cite ‘good design’ but this is not quantified or explained how it would be measured; No indication of personnel or qualifications of those whom are making the judgements 	Noted	None
P1_00 183_		Yes	As above	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 184_		No	The proposed policy seems to be focussed on new development. Extensions and adaptations, including those currently allowed as permitted development, can individually and cumulatively change the character of an area. The policy should be extended to include extensions and adaptations. This policy should actively support any local character areas and especially those developed in Neighbourhood Plans. What will be done to prevent our places like Croxley Green becoming characterless, bland and undifferentiated like so many other places in the UK? Creation of place should be central to Three Rivers planning. ‘Respecting local distinctiveness’ (4.2n) is reactive – the Local Plan should set out the ambition for ongoing creation of local character and differentiation between settlements and Three Rivers should encourage and support Neighbourhood plans to help achieve this.	<ul style="list-style-type: none"> Extension and adaptations can individually and cumulatively change the character of the area; Policy should actively support any local character areas and those developed in neighbourhood plans; What will be done to prevent places like Croxley Green becoming characterless; Local Plan should set out ambition for ongoing creation of local character. 	Noted	None
P1_00 186_		No	This development will have a significant negative impact on the environment and infrastructure	<ul style="list-style-type: none"> Development will have a significant negative impact on environment and infrastructure. 	Noted	None
P1_00 187_		No	The proposed policy seems to be focussed on new development. Extensions and adaptations, including those currently allowed as permitted development, can individually and cumulatively change the character of an area. The policy should be extended to include extensions and adaptations. This policy should actively support any local character areas and especially those developed in Neighbourhood Plans. What will be done to prevent our places like Croxley Green becoming characterless, bland and undifferentiated like so many other places in the UK? Creation of place should be central to Three Rivers planning. ‘Respecting local distinctiveness’ (4.2n) is reactive – the Local Plan should set out the ambition for ongoing creation of local character and differentiation between settlements and Three Rivers should encourage and support Neighbourhood plans to help achieve this.	<ul style="list-style-type: none"> Extension and adaptations can individually and cumulatively change the character of the area; Policy should actively support any local character areas and those developed in neighbourhood plans; What will be done to prevent places like Croxley Green becoming characterless; Local Plan should set out ambition for ongoing creation of local character. 	Noted	None
P1_00 190_		Yes	Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None

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P1_00 201_		Yes	The local aesthetic should be considered in development but shouldn't be building mass developments in villages in the first place	<ul style="list-style-type: none">• Agree with approach – Local aesthetic should be considered in development, do not mass build in villages.	Noted	None
P1_00 206_		Yes	NA	<ul style="list-style-type: none">• Agree with approach	Noted	None
P1_00 209_		No	I fail to see how the removal of large swathes of public footpaths/land will have anything other than a detrimental effect on the current distinctiveness of the area	<ul style="list-style-type: none">• Removal of public footpaths/ land will have a detrimental effect on distinctiveness of the area	Noted	None
P1_00 211_		No	The Council should explicitly support the local character areas identified within Neighbourhood Plans. Where appropriate, the permeability of new development sites should be maximised and the privatisation of the public realm should be discouraged. Entrance gates to housing development should not be permitted. Potential new pedestrian rights of way and cycle routes through the site should be considered if it benefits the existing community.	<ul style="list-style-type: none">• Council should support local character identified within Neighbourhood Plans;• Entrance gates to new houses should not be permitted;• New footpaths and cycle routes through the site should be considered if it benefits the existing community.	Noted	None
P1_00 215_		Yes	But as I have said before. It's all very well saying this is the plan. But if you don't stick to it then you don't create a world where we want to live. You just destroy our beautiful area by adding smaller and tightly packed houses. More congestion and urban sprawl.	<ul style="list-style-type: none">• Need to ensure policy is implemented and not destroy a beautiful area	Noted	None
P1_00 218_		Yes	New sites should be built around through routes walking or cycling, so that they don't become housing enclaves. This suggestion also reduces the dependency of new housing sites on the use of the car and motorised transport.	<ul style="list-style-type: none">• Build new sites around walking or cycling routes, will reduce dependency on cars.	Noted	None
P1_00 219_		No	In general I believe your preferred option to be sufficient for the protection of the existing environment. However as a direct result of recent developments within Chorleywood and Rickmansworth I feel that "(3) Innovative designs will be encouraged where appropriate" is foolhardy.	<ul style="list-style-type: none">• Recent developments in Chorleywood and Rickmansworth feel that "(3) Innovative designs will be encouraged where appropriate" mean this is false.	Noted	None
P1_00 220_M oor Park Reside nts Associ ation	Moor Park Residents Association	Not Stat ed	<ol style="list-style-type: none">1. The Associations wish to record their support in principle for this set of policies and the design criteria in Appendix 1, although there are some comments on the detailed wording, which are set out below. Generally, the Preferred Policy Option reflects the aims of the NPPF 2021 for the creation of high quality buildings and places. In the changes to the NPPF, the Government have clearly endorsed the recommendations of the Building Better, Building Beautiful Commission (BBBBC), including a changed social objective (paragraph 8b of the NPPF) to achieve “well-designed, beautiful, and safe places.” There is a new test (paragraph 133) to ensure that all development should be well-designed. In support of the notion of “building beautiful”, the Government has also published a new National Model Design Code and has strengthened the relevant parts of Planning Practice Guidance. Local authorities are advised to prepare Local Design Codes in order to deliver better-quality development which reflects local distinctiveness. In the light of these changes, the Council will clearly need to make further adjustments to the policy wording before submission of the Local Plan.2. In view of the Government's emerging support for Local Design Codes, it is suggested that the Council should consider the preparation of a stand-alone Design Code for Three Rivers, or, in collaboration with other authorities, for South West Hertfordshire. This would be fully illustrated and would supersede the written criteria set out in Appendix 1. The role of Neighbourhood Plans in addressing these issues should also be acknowledged in the text of the Local Plan.3. The following comments are offered on the detailed schedule in Preferred Policy Option 23:<ul style="list-style-type: none">• (7) A requirement for materials to be sympathetic to the local character and context should be added.• (8) The wording should be re-phrased to make clear that this provision will only apply in the case of large-scale developments, which are not subordinate to the local area. The reference to density should be removed.• (9) and (10) an additional policy should be inserted, requiring new developments to connect safely and easily to local facilities and services both for pedestrians and cyclists.• (11) In line 2, the policy should be re-phrased to include “social” as well as “economic “aspects. The term “suitable access” is open to interpretation and needs to be clearly defined in the supporting text.• (15) Whilst it is accepted that proper lighting is key for successful new places, the policy should also make the point that the effects of light pollution on surrounding areas should be controlled.4. With regards to Appendix 1 Design Criteria, the Associations have the following detailed comments:	<ul style="list-style-type: none">• Agree in principle with Appendix 1;• Changes reflect changes in the NPPF 2021;• Government have endorsed Building Better Commission to achieve well-designed, beautiful and safe places;• Government have published new National Modal Design Code, the Local Plan needs to be amended to reflect these changes;• With emerging Local Design Codes, suggested Council should consider preparation of a standalone Design Code for Three Rivers;• Regarding schedule in Preferred Option 23, make the following – requirement for materials to be sympathetic to the local character;• Re-phrase wording to make clear provision will only apply to large scale developments;• Additional policy should be inserted requiring new developments to connect safely and easily via pedestrian and cycling links;• Reword policy to include ‘social’ and ‘economic’ aspects;• Make reference to light pollution being controlled;• Regarding Appendix 1, rewords second sentence in Paragraph 2 on Daylight, Sunlight and Outlook;• Ensure 45 degree splay line is applied to prevent further harm to amenity of residential properties;• Residential amenity space – No definition of the precise requirements for open space - no standard defined for the amenity space required for a one-bed dwelling;• Clear definition of winter gardens is required.	<ul style="list-style-type: none">• Noted• Where other policies throughout the plan support cycle and pedestrian routes, PPO26 ‘Sustainable Transport and Travel’ policy 4(a) encourages provision for high quality and safe pedestrian and cycle provision and 5(d) promotes wider integration of pedestrian and cycle routes.• Where other policies through the plan address pollution, PPO17 Ground Conditions, Contamination and Pollution address minimising and permanently mitigating various forms of pollution (including light pollution).• Comments addressing Appendix 1 and not PPO23.	<p>Change policy wording PPO23 (11) from ‘economic success’ to ‘social value’.</p> <p>Include in policy wording for materials to be sympathetic to local character.</p> <p>Include in policy wording for proposals to take account of the local design and guidance identified with Neighbourhood Plan Character Areas, where available.</p> <p>Comments addressing Appendix 1 to be reviewed accordingly.</p>

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			<ul style="list-style-type: none"> • <u>Daylight, Sunlight, and Outlook</u> As written, paragraph 2 does not make sense. The second sentence should be re-written, to read “All dwellings should provide for direct daylight to enter habitable rooms for a reasonable period of the day. Living rooms, kitchens, dining rooms should preferably receive direct sunlight.” • <u>45 Degree Splay Line</u> Whilst this is a reduction on the current degree of protection offered, it appears that the revised policy does make sense and is easy to understand. To reflect the change, however, it is vital that the policy be strictly applied to prevent further harm to the amenity of residential properties.” • <u>Residential Amenity Space</u> In respect of the first sentence, there is no definition in the Appendix or elsewhere of the precise requirements for open space. It is essential that this be defined and subject to consultation before the submission draft of the Local Plan is completed. There is no standard defined for the amenity space required for a one-bed dwelling – this is a major omission. A clear definition of “winter gardens” is also required. 			
P1_00 222_T hree Rivers Green Party	Three Rivers Green Party	No	The Council should explicitly support the local character areas identified within Neighbourhood Plans. Where appropriate, the permeability of new development sites should be maximised and the privatisation of the public realm should be discouraged. Entrance gates to housing development should not be permitted. Potential new pedestrian rights of way and cycle routes through the site should be considered if it benefits the existing community.	<ul style="list-style-type: none"> • Council should support local character identified within Neighbourhood Plans; • Entrance gates to new houses should not be permitted; • New footpaths and cycle routes through the site should be considered if it benefits the existing community 	Noted	None
P1_00 223_		No	The above sounds fine but judging by what the Authority has approved in the past, designs may well have been considered 'good design' but in no way do they look as though they blend in with the surrounding buildings!	<ul style="list-style-type: none"> • Previous designs approved by the Council do not blend in so concerns about implementation of this policy. 	Noted	None
P1_00 224_		No	As long as it is all safeguarded! Words and reality can be very different things..	<ul style="list-style-type: none"> • As long as it is safeguarded, need to ensure this protection is implemented. 	Noted	None
P1_00 227_		No	The preferred policy seems to be focussed on new development. Extensions and adaptations, including those currently allowed as permitted development, can individually and cumulatively change the character of an area. The policy should be extended to include extensions and adaptations. This policy should actively support any local character areas and especially those developed in Neighbourhood Plans.	<ul style="list-style-type: none"> • Extension and adaptations can individually and cumulatively change the character of the area; • Policy should actively support any local character areas and those developed in neighbourhood plans; 	Noted	None
P1_00 230_		Not Stat ed	<p>1. Building materials need to be appropriate to the local character of the area.</p> <p>2. The effects of light pollution on surrounding areas should be controlled and monitored. Light pollution can be particularly damaging to wildlife as well as residents.</p> <p>3. In terms of considering the needs of providing a safe environment for pedestrians, the Council needs to address problem roads across the District which cause air and noise pollution and speeding issues.</p> <p>4. The history of a place needs to be given greater prominence and protection. Historical landscapes including rural and farming landscapes needs to be recognized as being of equal importance to listed and locally important buildings. Meadows and fields need to be recognized for the valuable contribution they make to the character of a place. Ancient lanes, hedgerows and field systems should be protected.</p> <p>Landscaping and Public Realm</p> <p>1. (20) Access and Inclusion. The Council should consider working with Third Sector Charities and other appropriate organizations to create environments and buildings which consider the needs of residents with Dementia, Mental Health, Disabilities and other health needs to ensure that all aspects of a place are accessible and inclusive.</p> <p>2. In terms of design there should be a consideration of allotments, community orchards, community cultivation plots and general support for local food production. Nature and gardening have health and wellbeing benefits which need to be incorporated into the design of developments.</p> <p>3. Areas and communities have their own unique and distinct characters and it is critical that residents are fully consulted on all aspects of a proposed development, its design and impact on the area so that any new developments can be integrated successfully.</p> <p>4. Assessment needs to be made of the impact of any new development on infrastructure, road network across the wider area and on utilities such as power, drainage and sewerage systems before any new building takes place. Some systems are already at capacity.</p> <p>5. Given that we are in a Climate Emergency, building design needs to meet the highest standards in terms of sustainability. Developments need to ensure they are created to be resilient to climate change. Construction should be undertaken in a sustainable manner and also minimise impact on residents and the environment.</p>	<ul style="list-style-type: none"> • Building materials need to be appropriate to local character; • Effects of light pollution on surrounding areas should be monitored and controlled; • Needs to address the need to provide a safe environment for pedestrians; • History of a place needs to be given greater prominence and protection; • Council should consider working with Third Sector Charities and other appropriate organizations to create environments and buildings which consider the needs of residents with Dementia, Mental Health, Disabilities and other health needs; • Should be consideration of allotments and community orchards; • Areas and communities have their own unique characteristics, local plan needs to recognise this; • Assessment needs to be made of the impact of any new development on infrastructure; • In a Climate Emergency, therefore building design needs to meet highest standards in terms of sustainability. Developments need to be resilient to climate change. 	Noted	None
P1_00 232_		Yes	All Good	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 233_		No	I disagree that the Preferred Policy Option for Local Distinctiveness and Place Shaping is the right approach. Point 11.19 should be a requirement not simply encouraged. These largescale developments must be regulated at all stages of the application process to	<ul style="list-style-type: none"> • Point 11.19 should be a requirement not simply encouraged. Need to ensure developments are regulated at all stages of the application process. 	Noted	None

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			ensure the needs of the local community are being met, and that the agreed local plan policies are adhered to.			
P1_00 234_		Yes	I disagree that the Preferred Policy Option for Local Distinctiveness and Place Shaping is the right approach. Point 11.19 should be a requirement not simply encouraged. These largescale developments must be regulated at all stages of the application process to ensure the needs of the local community are being met, and that the agreed local plan policies are adhered to.	<ul style="list-style-type: none">Point 11.19 should be a requirement not simply encouraged. Need to ensure developments are regulated at all stages of the application process.	Noted	None
P1_00 236_		Yes	Stipulations make sense	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 240_		Yes	Yes	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 244_		No	Though it pains me to say it, the 'distinct local character' of the built environment cannot remain unchanged if we are to prevent the loss of Green Belt sooner or later. Specifically, high-density housing has to be a consideration - in the form of (medium) high-rise apartments. We don't want a 23 storey block like the one that now overlooks Croxley from Ascot Road, but something like 8 storey blocks would be tolerable as a trade-off.	<ul style="list-style-type: none">Distinct Local character of the built environment cannot remain unchanged in order to prevent loss of Green Belt;Not 23 storey blocks at Croxley, but 8 storey would be acceptable.	Noted	None
P1_00 252_		Yes	Keeping the distinctiveness of a local area is vital. Measures should be put in place to guarantee that future development adheres to this. More important aspect of this is not having gate communities to new housing estates. Gated communities causes division and resentment to residents leaving in the area and sends out the wrong messages to residents. Integration is vital in communities and having gated entrances to housing sends out the wrong message.	<ul style="list-style-type: none">Agree with approach;Put in place measures that future developments adhere to this policy;Community integration is vital; gated housing entrances not in line with this.	Noted	None
P1_00 256_		Yes	Seems reasonable	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 261_		No	Again apple pie. Needs to be more detailed about what makes three rivers special and what should be protected. Is this plot size or plot size ratios?	<ul style="list-style-type: none">Need to be more detailed about what makes Three Rivers special;Is this plot size or plot ration	Noted	None
P1_00 262_		Yes	developments must enable active transport and community surveillance	<ul style="list-style-type: none">Developments must enable active transport and community surveillance.	Noted	None
P1_00 265_		Yes	Support in principle for this set of policies and the design criteria in Appendix 1, although there are some wording changes that should be made.	<ul style="list-style-type: none">Agree with approach, but some wording changes should be made in Appendix 1.	Noted	None
P1_00 271_		Yes	Seems sensible	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 301_C hiltern s Conser vation Board	Chilterns Conservatio n Board	Not Stat ed	<p>The Chilterns Conservation Board generally supports PPO23 on Local Distinctiveness. In common with our response to Q7 above, this policy could also be enhanced with reference to the Chilterns Buildings Design Guide and other design advice published by the Chilterns Conservation Board. Our design guidance provides advice on how to design developments (including non-residential development) in ways that respond to the characteristics of the Chilterns AONB and its setting, but also has applicability to all areas within the Chilterns and Thames Valley National Character Areas as a result of their underlying geology.</p> <p>We suggest the addition of the following text after criterion 2 of PPO23, either continuing that paragraph or as a new criterion: Within the Chilterns Area of Outstanding Natural Beauty and its setting, development proposals must demonstrate how they have taken the character of the area into account, with reference to the Chilterns Buildings Design Guide and other guidance published by the Chilterns Conservation Board. The council recognises that the landscape characteristics and vernacular building styles of the district even outside of the AONB are compatible with those found across the Chilterns. While strict adherence to the advice will not always be appropriate or necessary, the council recommends that consideration is given to the Chilterns Buildings Design Guide for any development proposals in the district. Further information about the Guidance can be found here: https://www.chilternsaonb.org/conservation-board/planning-development/buildings-designguidance.html. (Please note that our website is currently under review, so do check the latest address for this with us before publication).</p> <p>Note: “Place shaping” (as used in PPO23) and “place making” are terms that are often confused. This policy refers to “place making” (or “place making”/“place-making”), which is basically the same as urban design – the practice of designing the physical appearance and layout of places (rather than individual buildings) that work for people and the environment. Place-shaping, on the other hand, has a specific meaning, defined by Sir Michael Lyons in his review of local government as “the creative use of powers and influence to promote the general well-being of a community and its citizens”. The policy would be improved either by using the term “place-making”, or (preferably) avoiding either of these nasty bits of jargon at all.</p>	<ul style="list-style-type: none">Agree with approach;Policy should be enhanced with reference to Chilterns Building Design Guide;Suggest text alteration after Criterion of PPO23;‘Place making’ and ‘Place shaping’ are often confused. The policy would be improved either by using the term “place-making”, or (preferably) avoiding either of these nasty bits of jargon at all.	Noted	To examine whether a textual change is required before Regulation 19.
SC_00 020_C horley wood Parish Council	Chorleywood Parish Council	Not stat ed	<p>Whilst many elements of this policy make sense and therefore are acceptable, other elements need amendment or removal:</p> <p>In the detailed schedule in Preferred Policy Option 23:</p> <p>(7) A requirement for materials to be sympathetic to the local character and context should be added.</p>	<ul style="list-style-type: none">Regarding schedule in Preferred Option 23, make the following – requirement for materials to be sympathetic to the local character;	<ul style="list-style-type: none">NotedWhere other policies throughout the plan support cycle and pedestrian routes, PPO26 ‘Sustainable Transport and Travel’ policy 4(a)	<p>Change policy wording PPO23 (11) from ‘economic success’ to ‘social value’.</p> <p>Include in policy wording for materials to be sympathetic to local character.</p>

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			<p>(8) The wording should be re-phrased to make clear that this provision will only apply in the case of large-scale developments, which are not subordinate to the local area. The reference to density should be removed as increasing the density is never an excuse for introducing unsuitable designs into an existing community, the change in density should consider the local context.</p> <p>(9) and (10) an additional policy should be inserted, requiring new developments to connect safely and easily to local facilities and services for both pedestrians and cyclists.</p> <p>(11) In line 2, the policy should be re-phrased to include “social” as well as “economic” aspects. The term “suitable access” is open to interpretation and needs to be clearly defined in the supporting text. Whilst other qualities covered in this policy point are defined in Appendix 1, this term is not defined and is therefore open to misinterpretation.</p> <p>(15) Whilst it is accepted that proper lighting is key for the success of new places, this policy point should include that this must be undertaken to ensure negative impacts on the surrounding area from light pollution are properly controlled.</p> <p>With regards to Appendix 1 Design Criteria, the Associations have the following detailed comments:</p> <p>Daylight, Sunlight, and Outlook. As written, paragraph 2 does not make sense. The second sentence should be re-written, to read “All dwellings should provide for direct daylight to enter habitable rooms for a reasonable period of the day. Living rooms, kitchens, dining rooms should preferably receive direct sunlight.”</p> <p>45 Degree Splay Line. Whilst this is a reduction on the current degree of protection offered, it appears that the revised policy does make sense and is easy to understand. However, to reflect the reduction in protection, it is vital that the policy be strictly applied to prevent further harm to the amenity of residential properties.”</p> <p>Residential Amenity Space: In respect of the first sentence, where are the requirements for public open space defined. The sentence refers to “Policy XX”, and a search of the document reveals no reference to standards / requirements for public open space in the policies. It is essential that this be properly defined and consulted on before moving forward with the plan.</p> <p>Residential Amenity Space: Why is there no defined standard for the amenity space required for a 1 bed house? This is a major omission, and it is unacceptable (and probably infeasible) to allow such houses to be built without amenity space.</p> <p>Residential Amenity Space: Is a definition of “winter gardens” to be provided? This is quite a loose term and clear definition is considered necessary.</p>	<ul style="list-style-type: none">• Re-phrase wording to make clear provision will only apply to large scale developments;• Additional policy should be inserted requiring new developments to connect safely and easily via pedestrian and cycling links;• Reword policy to include ‘social’ and ‘economic’ aspects;• Make reference to light pollution being controlled;• Regarding Appendix 1, rewords second sentence in Paragraph 2 on Daylight, Sunlight and Outlook;• Ensure 45 degree splay line is applied to prevent further harm to amenity of residential properties;• Residential amenity space – No definition of the precise requirements for open space - no standard defined for the amenity space required for a one-bed dwelling;• Clear definition of winter gardens is required.	<p>encourages provision for high quality and safe pedestrian and cycle provision and 5(d) promotes wider integration of pedestrian and cycle routes.</p> <ul style="list-style-type: none">• Where other policies through the plan address pollution, PPO17 Ground Conditions, Contamination and Pollution address minimising and permanently mitigating various forms of pollution (including light pollution).• Comments addressing Appendix 1 and not PPO23.	<p>Include in policy wording for proposals to take account of the local design and guidance identified with Neighbourhood Plan Character Areas, where available.</p> <p>Comments addressing Appendix 1 to be reviewed accordingly.</p>
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Q24. Should we have considered alternative options?						
PL_00 027_C FS64	Nexus Planning on behalf of Inland Homes		<p>8.1 Criteria 4-8 of Preferred Policy Option 23 require developments to respond to locally distinctive patterns of development and character. Notably, criterion 5 states that:</p> <p>“Development should make efficient use of land whilst respecting the distinctiveness of the surrounding area in terms of density, character, layout and spacing, the pattern of street blocks and plots, building forms, amenity, scale, height, massing, style, landscaping and the use of materials.” (Emphasis added)</p> <p>8.2 This approach is consistent with the Framework, notably paragraphs 124 and 130, and is therefore supported by Inland Homes.</p> <p>8.3 However, its application through the Plan is flawed given the site capacities identified for potential housing allocations. Rather than allowing developments to have regard to the character and grain of their localities, Preferred Policy Option 3 prescribes a minimum density of 50dph and even though we note there are some exceptions to this, it does not appear to have been applied to the draft allocations. Accordingly, we are concerned that the Council's strategy would in fact erode distinctive of areas rather than respect it, thus raising a further internal conflict.</p>	<ul style="list-style-type: none">• Re-states part of policy, consistent with framework.• Application of policy (relating to respecting distinctiveness of the surrounding area in terms of density) is flawed given the high site capacities identified for potential allocations and the minimum target density of 50DPH. Target density would erode distinctive areas rather than respect it.	<ul style="list-style-type: none">• Noted.• DPH is indicative only and will be determined at the planning application stage. The draft Housing Mix and Type Policy makes clear that the mix may need to be adjusted for specific schemes to take account of market information, housing needs and preferences, the Council's Housing Register and specific site factors.	No action
P1_00 014_		Yes	As before	<ul style="list-style-type: none">• Agree with approach. Ensure it is implemented.	Noted	None
P1_00 017_		Yes	Mandatory requirements	<ul style="list-style-type: none">• Make the requirements mandatory	Noted	None
P1_00 023_		Yes	Ok	<ul style="list-style-type: none">• No alternatives suggested	Noted	None
P1_00 025_		Yes	Specific amenities the area actually needs	<ul style="list-style-type: none">• Specific amenities in the area needed.	Noted	None
P1_00 040_		Yes	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none">• Do not development Green Belt Land	Noted	None

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P1_00 041_		Yes		<ul style="list-style-type: none">No alternatives suggested	Noted	None
P1_00 055		Yes	Less development and fewer new homes. Opposing government targets which are unrealistic	<ul style="list-style-type: none">Less development and fewer homes, oppose government targets	Noted	None
P1_00 064_		Yes	Planning rules insist on the same set of mundane housing stock - mock Georgian. Provided the housing meets sustainability guidelines and affordable housing, "nonconventional" designs should be permitted,	<ul style="list-style-type: none">Nonconventional designs should be permitted, not standard mock Georgian	Noted	None
P1_00 065_		Yes	The provision of services, bike routes and parking needs to be supported by making people feel safe but also with more cars turning to electric there needs to be future proofing of the charging network.	<ul style="list-style-type: none">Provision of services, bike routes and parking needs to be supported by making people feel safe.	Noted	None
P1_00 066_		Yes	Agree	<ul style="list-style-type: none">Agree with approach	Noted	None
P1_00 068_		Yes	All large scale developments should be put to the surrounding residents - they should be won over rather than bulldozed with the "protected" wildlife.	<ul style="list-style-type: none">Large scale developments should be won over rather than bulldozed.	Noted	None
P1_00 089_		No		<ul style="list-style-type: none">Do not agree with approach, but no reason given.	Noted	None
P1_00 096_		Yes	As stated above!	<ul style="list-style-type: none">No development of Green Belt or Greenfield.	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 106_		Yes		<ul style="list-style-type: none">No alternatives suggested	Noted	None
P1_00 119_		Yes	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none">Land is sanctuary for wildlife	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00 127_		Yes	No green belt development	<ul style="list-style-type: none">No development in the Green Belt	The priority for development is making as much use as possible of	None

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					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".	
P1_00 132_		Yes	take account of residents views	<ul style="list-style-type: none"> Take account of residents views 	Noted	None
P1_00 135_		Yes	Where appropriate, the permeability of new development sites should be maximised and the privatisation of the public realm should be discouraged. Entrance gates to housing development should not be permitted. Potential new pedestrian rights of way and cycle routes through the site should be considered if it benefits the existing community.	<ul style="list-style-type: none"> Permeability of new development sites should be maximised and privatisation of public realm should be discouraged; Entrance gates to housing developments should not be permitted; New footpaths and cycle routes in developments should be considered if positive for community. 	Noted	None
P1_00 137_		Yes	See Above	<ul style="list-style-type: none"> Cars to dwellings ratio will lead to parking and pollution problems; Local people using public transport is an idealistic, not realistic, solution. 	Noted	None
P1_00 144_		Yes	We need to sacrifice the visual impact, limited where possible, of high rise, to save green belt	<ul style="list-style-type: none"> Sacrifice visual impact, limited, to save the Green Belt 	Noted	None
P1_00 147_		Yes	Look at innovative new construction techniques and help people to learn about the benefits of different approaches but positive energy building	<ul style="list-style-type: none"> Need innovative construction techniques to help people learn about benefits of different positive energy buildings. 	Noted	None
P1_00 201_		Yes	Not building in villages	<ul style="list-style-type: none"> Do not build in villages. 	Noted	None
P1_00 209_		Yes	It is for councillors to consider sensible, alternative options and proposal a range of those options	<ul style="list-style-type: none"> For councillors to consider alternative approaches 	Noted	None
P1_00 215_		Yes	Look at the size and beauty of some of the areas and do more to protect these. Look at the unused and ugly and look to improve those to make more desirable.	<ul style="list-style-type: none"> Look at unused/ ugly sites and look at ways to improve these. 	Noted	None
P1_00 219_		Yes	As above	<ul style="list-style-type: none"> Recent developments in Chorleywood and Rickmansworth feel that "(3) Innovative designs will be encouraged where appropriate" mean this is false. 	Noted	None
P1_00 244_		Yes	See my previous response.	<ul style="list-style-type: none"> Distinct Local character of the built environment cannot remain unchanged in order to prevent loss of Green Belt; Not 23 storey blocks at Croxley, but 8 storey would be acceptable. 	Noted	None
P1_00 262_		Yes	Many new developments in this area have adopted a higgledy-piggledy mismatched cul-de-sac character. The large number of these means that the character of the whole area is changing. Efforts must be made to ensure new	<ul style="list-style-type: none"> Character of whole area is changing; Ensure new developments fit in with character of the area; 	Noted	None

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			developments fit in with the actual character of the area, not the developer's generic model of what "villages" or "towns" look like. Cul-de-sacs must be eliminated as a model to increase active transport, increase local footfall and therefore community surveillance and to reduce road maintenance costs.	<ul style="list-style-type: none">Cul de sacs must be eliminated as a model to increase active transport and footfall		
P1_00 265_		Yes	It is important as mentioned in other responses that any new construction is sympathetic to the local area – some areas of the district are relatively new others are historic and the plan needs to ensure that where possible these characters are maintained.	<ul style="list-style-type: none">Any construction must be sympathetic to the local area.	Noted	None