

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

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
General Comments/other comments						
SC_00003_TFL	TfL	No objection to Part 1	<p>TfL provides rail services on the London Overground, London Underground and Docklands Light Railway as well as bus services. TfL also manages the Transport for London Road Network (TLRN). TfL therefore has an interest in any Local Plan policies or site allocations that could have an impact on cross boundary transport services, strategic transport infrastructure or the delivery of the Mayor of London's transport policies. A separate response to the consultation will be provided by TfL Commercial Development in TfL's capacity as a landowner and potential developer of a number of sites including CFS20, CFS40A, CFS41 and CFS16.</p> <p>Within Three Rivers District, London Overground provides local rail services to Watford which call at Carpenders Park station. London Underground Metropolitan Line serves stations at Moor Park, Chorleywood, Rickmansworth and Croxley.</p> <p>The proposed Metropolitan Line Extension (MLX) project formerly known as the Croxley Rail Link was to provide a new alignment to Watford Junction beyond the existing Croxley station but due to funding pressures the original project is not proceeding and Transport and Works Act (TWA) powers have now lapsed. TfL is now working with Hertfordshire County Council, Watford Borough Council and Three Rivers District Council as alternative options for the route alignment are considered. If this results in a scheme being taken forward using the former Croxley branch alignment then there may be some impact on site allocations close to the MLX route including the following sites in the Croxley Green section: CFS20, CFS61, PCS12 and to a lesser extent CFS19. Although we have no objections to the development of these sites, they were part of the land in the TWA Order required to deliver the MLX scheme, so any decision making will need to take that into account. The key issue would be that any future development on allocated sites that are adjacent to or potentially conflict with the former MLX route would need to be planned accordingly so that housing development and any future transport scheme can work together. It is important that any developments on these sites do not preclude a future transport scheme along this route. Any proposals for sites close to existing London Underground or London Overground infrastructure such as track, equipment and stations (including sites CFS12, CFS61, H9 and CW24), would need to be the subject of early consultation with Infrastructure Protection teams to ensure that there are no conflicts with rail operations and that access is maintained.</p> <p>Site allocations close to the London boundary or on strategic routes or corridors should include measures to maximise use of alternatives to the car including active travel and public transport and seek to minimise impacts on local and strategic highways networks including the TLRN.</p> <p>The new London Plan was published in March 2021. We would be grateful, if the policies and site allocations requirements could take account of the Mayor's strategic transport policy objectives for London including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger TfL looks forward to providing further input as the Local Plan is progressed.</p>	<ul style="list-style-type: none"> No concerns regarding Part 1 of the Plan; Issues regarding safeguarding of land for Part 2 Allocations. The proposed Metropolitan Line Extension (MLX) project formerly known as the Croxley Rail Link was to provide a new alignment to Watford Junction beyond the existing Croxley station but due to funding pressures the original project is no longer going ahead. TfL is now working with Hertfordshire County Council, Watford Borough Council and Three Rivers District Council as alternative options for the route alignment are considered. If this results in a scheme being taken forward using the former Croxley branch alignment then there may be some impact on site allocations close to the MLX route including the following sites in the Croxley Green section: CFS20, CFS61, PCS12 and to a lesser extent CFS19. Although we have no objections to the development of these sites, they were part of the land in the TWA Order required to deliver the MLX scheme, so any decision making will need to take that into account. The key issue would be that any future development on allocated sites that are adjacent to or potentially conflict with the former MLX route would need to be planned accordingly so that housing development and any future transport scheme can work together. 	<ul style="list-style-type: none"> Noted. Noted and acknowledged. TRDC will continue DTc discussions with TFL and Watford regarding a new proposed alignment. 	No action
SC_00005_Affinity Water	Affinity Water	No Objection	<p>Existing water network</p> <p>We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites. This may affect development potential in some cases, as no development will be permitted within a specified distance of these services.</p> <p>Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early on in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive, but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed.</p>	<ul style="list-style-type: none"> Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and developers are encouraged to discuss their proposals with Affinity Water in advance of the submission of any planning applications utilising Affinity Water's pre-application advice service at: https://www.affinitywater.co.uk/developer-services.aspx 	Noted. Reference will be made to the water efficiency standards as set out within Building Regulations.	<p>On the planning applications web-page can we include a link to Affinity water asking developers to contact them as part of the validation process?</p> <p>We may need to include water efficiency targets within the water policy?</p>

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		<p>I would also like to remind you that Local Authorities can obtain free infrastructure maps from us, including access to our external facing GIS called 'NRSWA'. We can also supply infrastructure information as data, and we will supply this free of charge but usually only under a Non-Disclosure Agreement (NDA). If this is something you would like to pursue, please write to us via our maps@affinitywater.co.uk mailbox.</p> <p>The performance of our network has been assessed under 2 different scenarios:</p> <ol style="list-style-type: none"> 1. Current demand – to establish the baseline 2. Future demand (including future developments in AW records and Three River District Council sites listed in the table on slide 2). All developments are assumed to be in place at the time specified. <p>All the assessed scenarios have been scaled to reflect peak summer water demand conditions. According to the simulation results:</p> <ul style="list-style-type: none"> • The demand increase due to the Three River District Council Domestic sites will be approximately 4.04 Ml/day (8,973 domestic units) • The demand increase for the Three River District Council Employment/Other sites will be approximately 4.13 Ml/day (68.8 ha) • The pressures at the critical points in the network due to the new developments are such that major reinforcements in the network in the Three River District Council area will be required. This normally means new pipelines although in some cases new pumping stations will also be required. There is sufficient water supply in the region. <p>All the proposed reinforcements will aim to recover the current level of service and the loss of capacity in the network due to the additional load imposed by all projected development. The above comments are valid based upon the growth data you have shared with us. However, it is necessary to highlight that nearby Local Authorities are projecting a significant increase in demand which can influence the nature and pace of planned infrastructure required in the area for future growth. For this reason we strongly encourage early engagement on plans for future development, to ensure we can effectively plan for the impacts of the associated increase in demand. All projections of infrastructure capacity are subject to developers and customers reducing their PPC (<i>Per Capita Consumption</i>) in accordance with our WRMP (<i>Water Resources Management Plan</i>) through the development of water-efficient buildings; and encouraging customers to save water (please see Water Resources section below).</p> <p>Water Resources</p> <p>Affinity Water is committed to reducing leakage and helping our customers reduce their water consumption, to ensure that we take only what is necessary from the environment. We hope that creating sustainable communities should be a priority for local authorities and developers. It is fundamental to considering water sustainability in the long-term for all new homes, as this will potentially impact economic and population growth and the local environment.</p> <p>We note that your draft plan references water efficiency in new builds, however, there does not appear to be specific mention of any numbers or targets associated with this. Every local authority within our supply area is encouraged to have a water use target set for new development of 110 litres per person per day or less, as per the Building Regulations part G. Plans which include new developments should therefore clearly include the requirement of 110 l/h/d for new builds. We would also expect the following to be associated with new developments:</p> <ul style="list-style-type: none"> • It is fundamental that developers use water efficient fittings and fixtures in all new developments (households and non-households) • The means by which monitoring of the implementation of the water consumption target in new homes should also be determined by the local authority and should be implemented on all new developments. • We highly encourage local authorities and developers to consider the wider water environment. Therefore, for any new development we would expect consideration of the incorporation of water efficient features such as rainwater harvesting, rainwater storage tanks, water butts and green roofs to be given as appropriate. • Increased water efficiency for all new developments helps to ensure water resources can be managed effectively across the region. As set out in our WRMP19 this will help us to safeguard resilience of supply whilst minimising impacts on the environment. Lower water usage also reduces water and energy bills for residents. <p>Affinity Water expects new homes to comply with Part G of the Building Regulations to help manage domestic customer consumption. However, the company remains concerned that whilst new homes meet the conditions set out by Part G, residents could remove the water efficient devices after they have moved in, increasing their household demand for water. It believes that a partnership between local authorities, residents and Affinity Water is essential to help educate customers about their use of water and how all parties can work together to protect this vital resource.</p>	<ul style="list-style-type: none"> • Local Authorities can obtain free infrastructure maps from us, including access to our external facing GIS called 'NRSWA'. We can also supply infrastructure information as data, and we will supply this free of charge but usually only under a Non-Disclosure Agreement (NDA). If this is something you would like to pursue, please write to us via our maps@affinitywater.co.uk mailbox. • Water resources-We note that your draft plan references water efficiency in new builds, however, there does not appear to be specific mention of any numbers or targets associated with this. Every local authority within our supply area is encouraged to have a water use target set for new development of 110 litres per person per day or less, as per the Building Regulations part G. Plans which include new developments should therefore clearly include the requirement of 110 l/h/d for new builds. 		
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SC_000 06_National Grid	National Grid	No objection	<p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Response We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.</p>	<ul style="list-style-type: none"> Provides additional information for development near national grid assets (power lines and gas assets which relate to planning applications). 	Noted.	No action
SC_000 09_Sarratt Parish Council	Sarratt Parish Council	Support	<p>SPC supports TRDC's draft new Local Plan on the basis it:</p> <ul style="list-style-type: none"> Protects the rural nature of the Parish, including the Area of Outstanding Natural Beauty (AONB) and ancient woodland sites within Sarratt Parish; Retains the rural aspect of the core villages and hamlets in the Parish; Preserves a large proportion of the Green Belt within the Three Rivers District; and Keeps 'open access' to footpaths, woodlands, meadows and the River Chess that are available and valued by residents throughout the Three Rivers District who come to Sarratt to enjoy the outdoor space and amenities, such as the country pubs, which have proved so important for people's mental health during the pandemic and in the future. 	<p>Supports local plan on basis:</p> <ul style="list-style-type: none"> Protects the rural nature of the Parish, including the Area of Outstanding Natural Beauty (AONB) and ancient woodland sites within Sarratt Parish; Retains the rural aspect of the core villages and hamlets in the Parish; Preserves a large proportion of the Green Belt within the Three Rivers District; and Keeps 'open access' to footpaths, woodlands, meadows and the River Chess that are available and valued by residents throughout the Three Rivers District who come to Sarratt to enjoy the outdoor space and amenities, such as the country pubs, which have proved so important for people's mental health during the pandemic and in the future 	Noted	<ul style="list-style-type: none"> No Action
SC_000 10_Defence Infrastructure Organisation (MOD)	Defence Infrastructure Organisation (MOD)	No objection – suggests additional policy	<p>Firstly, we would like to thank the Council for the opportunity to comment on the above emerging plan. These comments are submitted on behalf of the Secretary of State for Defence. The response is in addition to any made by DIO Safeguarding.</p> <p>Please see attached a plan showing the extent of the MOD land ownership at Northwood within the plan area. As communicated to your colleagues the MOD Northwood site is a significant defence asset where additional development is envisaged to support National Security needs. In line with the need to ensure matters of National Security are considered and National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. As such operational development on MOD establishments should be supported. In turn, due to the need to maintain operational capabilities, development in proximity of MOD Establishments should be required to demonstrate that they align with the 'agent of change' principle found in paragraph 182 of the NPPF. As such their development won't lead to the need for mitigation from MOD activities. It is therefore suggested that emerging development plans include a specific policy to address those needs. Such a policy also needs to recognise the brownfield nature of MOD sites and the MOD's commitments to bring forward proposals to reduce its built estate, as part of those proposals sites could be declared as surplus. Such policies have been adopted in development plans across the UK. For MOD operational developments the associated community facilities needed are identified through nationally set guidance known as Joint Service Publications (JSPs). In summary, these seek to identify that the daily needs of service personnel are met within MOD establishments. It would not therefore be appropriate for CIL / Developer contributions policies not to take account of that level of existing provision and "double count" contributions needed.</p> <p>Suggested policy on MOD Establishments: POLICY Military Establishments: New development at military establishments that helps enhance or sustain their operational capability will be supported. Redevelopment, conversion of change of use of redundant MOD sites and buildings will be supported. Non-military or non-defence related development within or in the areas around a MOD site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.</p> <p>Neighbourhood Plans The case of Daws Hill v Wycombe (C1/2013/0861) established that land should not be included in neighbourhood plans where it would lead to 'false expectations' (para 22). Neighbourhood plans should therefore be realistic about what they can control. It should be noted that separate legislation applies to the Crown estate and the operational military nature of MOD sites means that engagement and enacting of Neighbourhood plans to cover the area would not be appropriate. It is therefore suggested that designated Neighbourhood Plan areas should exclude MOD establishments.</p>	<ul style="list-style-type: none"> Requests a specific policy to be included in draft Local Plan Suggested policy on MOD That MOD at Northwood (map provided) be removed from any CIL Charging Area (infrastructure provided on site and governed by nationally set guidance known as Joint Service Publications) That the MOD site in Northwood is excluded from any Neighbourhood Plan/Area due to them being subject to separate legislation that applies to the Crown Estate and the operational military nature of the MOD site 	<ul style="list-style-type: none"> Agreed. New section to be added to Local Plan with suggested draft policy Noted. MOD facility to be excluded from CIL charging schedule when review is undertaken. Noted. No neighbourhood plan for that area at the moment but will keep this in mind. 	<p>New section to be included in Local Plan with following policy:</p> <p>POLICY Military Establishments: New development at military establishments that helps enhance or sustain their operational capability will be supported. Redevelopment, conversion of change of use of redundant MOD sites and buildings will be supported. Non-military or non-defence related development within or in the areas around a MOD site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.</p>

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SC_000 17_Chalfont St Peter Parish Council	Chalfont St Peter Parish Council	<p>Chalfont St Peter Parish Council wish to comment on those aspects of the Three Rivers Local Plan 2021 which affect or may impact on the residents and businesses within the Parish and its outlying parts.</p> <p>Chalfont St Peter is a large village conurbation with an estimated population of c14,000 and is situated at the extreme East of the County of Buckinghamshire. Maple Cross lies just to the East of the County border between Buckinghamshire and Hertfordshire and at its closest is less than one mile from residential properties in Shire Lane. The two communities lie closer together than say Chalfont St Giles to Chalfont St Peter. Distance from the Dumb Bell Public House (on the Bucks/Herts border) on Shire Lane is for example just 0.56 miles from the top of The Hawthorns in Maple Cross. That represents the extent of width of green belt at present between the two communities.</p> <p>Both communities lie on trunk roads having a North to South axis. Historically a series of lanes have connected the two on an East West axis. With the closure of West Hyde Lane/Chalfont Road in 2018 there remain just two such routes:</p> <p>Rickmansworth Lane/ Shire Lane/Hornhill Road Gorelands Lane/Chalfont Lane</p> <p>At the crossing point with Shire Lane/Hornhill Road the communities are separated by the M25 motorway which runs in a deep cutting.</p> <p>Highways and access represent one of the issues in which the Parish Council is concerned.</p> <p>Chalfont St Peter lies less than a mile South of the Chilterns AONB, nonetheless within the Chilterns (and often referred to as The Gateway to the Chilterns). Part of the Parish also lies within the Colne Valley Park. Maple Cross also lies within the Colne Valley Park. Some of Three Rivers District Council lies in the same AONB (546ha) and much of the Colne Valley Park lies within it also.</p> <p><u>LIMIT OF THE PARISH COUNCIL'S RESPONSE</u></p> <p>The Parish Council does not intend to comment on all proposed areas of development but only those where they rub with the boundary with Chalfont St Peter.</p> <p>Sites in the plan in close proximity to Chalfont St Peter</p> <table border="0"> <tr> <td>EOS.12.2</td> <td>West and South Maple Cross</td> <td>1500 homes & 90 bed care home</td> </tr> <tr> <td>EOS.12.3</td> <td>North Chalfont Lane</td> <td>176 homes</td> </tr> <tr> <td>CFS31</td> <td>24 Denham Way and land to rear</td> <td>55 homes</td> </tr> <tr> <td>EOS.7.0</td> <td>South Shepherds Lane/west of M25</td> <td>760 homes</td> </tr> <tr> <td>CFS32a</td> <td>Maple Cross Industrial area</td> <td></td> </tr> </table> <p>We understand that Three Rivers DC is looking to provide circa 11,000 dwellings during the plan period. It would seem that this high proportion in this SW area of the Three Rivers district is inequitable as it amounts to almost 25% of the total requirement for Three Rivers. Your statistics quote an increase in population of 145%.</p> <p>This area is already crossed by the M25 motorway and HS2 and is currently targeted as a site for a motorway service area between junctions 16 & 17 of the M25.</p> <p><u>SUSTAINABILITY</u></p> <p>These sites are not sustainable and will be very car dependent for access to shopping, employment and Rickmansworth Station.</p> <p>Page 18 – 7 cites “reduce the need to travel by locating development in sustainable and accessible locations”</p> <p>This is acknowledged in your reports which say that to develop these sites would require an extension to the school, shops, communal facilities, a nursery, GP surgery, open space, play space and commercial space plus an extended bus route through the site. This in effect will be creating a new “village” community.</p> <p>There is also an acknowledgement that there will be noise and air quality issues due to the proximity of the M25.</p>	EOS.12.2	West and South Maple Cross	1500 homes & 90 bed care home	EOS.12.3	North Chalfont Lane	176 homes	CFS31	24 Denham Way and land to rear	55 homes	EOS.7.0	South Shepherds Lane/west of M25	760 homes	CFS32a	Maple Cross Industrial area		<ul style="list-style-type: none"> TRDC is looking to provide circa 11,000 dwellings and high proportion in this SW area of the Three Rivers district. This is inequitable as it amounts to almost 25% of the total requirement for Three Rivers and an increase in population of 145%. Sites are not sustainable and very car dependent for access to shopping, employment and Rickmansworth Station; <p><u>SUSTAINABILITY</u></p> <ul style="list-style-type: none"> Page 18 – 7 cites “reduce the need to travel by locating development in sustainable and accessible locations and to develop these sites would require an extension to the school, shops, communal facilities, a nursery, GP surgery, open space, play space and commercial space plus an extended bus route through the site. Therefore creating a new “village” community. Highways and access represent one of the issues Parish Council have concerns with. There is also an acknowledgement that there will be noise and air quality issues due to the proximity of the M25. 	<ul style="list-style-type: none"> 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”. Noted. <u>Discussions will need to be undertaken / details provided in relation to the sites and sustainable mitigation in order to achieve a LTP4 compliant site</u> 	No action
EOS.12.2	West and South Maple Cross	1500 homes & 90 bed care home																		
EOS.12.3	North Chalfont Lane	176 homes																		
CFS31	24 Denham Way and land to rear	55 homes																		
EOS.7.0	South Shepherds Lane/west of M25	760 homes																		
CFS32a	Maple Cross Industrial area																			
SC_000 21_Buckinghamshire Council	Buckinghamshire Council	<p>Buckinghamshire Council will continue Duty to Co-operate engagement with Three Rivers DC on the Three Rivers Local Plan and the Buckinghamshire Local Plan. This will cover updates and information on un-met development needs, how the sites at Maple Cross will be dealt with and other strategic cross boundary issues. Please can all future consultations from Three Rivers District Council be directed to the following inbox planningpolicyteam.bc@buckinghamshire.gov.uk</p>	<ul style="list-style-type: none"> Noted. 	Noted.	DTC details to be added to local plan database.															

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SC_000 23_Cro xley Green Parish Council	Croxley Green Parish Council	YES	<p>Croxley Green Parish Council has concerns about three aspects of the Preferred Policy Options in the proposed Local Plan:</p> <ol style="list-style-type: none"> Strategic Considerations. The proposed policies and site allocations provide a useful framework for many aspects of development control. However, there is no overarching vision for the sustainable development of the district and the various settlements within it. The Local Plan seems to be a collection of ad hoc responses to the various development pressures on the district rather than a strategic vision for sustainable development to meet the needs of the communities which make up Three Rivers. Two particular examples: <ul style="list-style-type: none"> Proposals for the development or redevelopment of town and other local centres (such as Croxley Green) to meet the evolving needs of the community as the population grows Proposals for development to meet the health, social and educational needs of the communities over the next 30 years Environmental Considerations. The UN has identified three separate global crises facing humanity: • Climate change • Species extinction • Waste disposal. The UK Government has set itself challenging targets. The Local Plan should reflect the scale of these problems and the changes needed to meet the targets and protect the planet, humanity, and the natural resources upon which we all ultimately depend. Although there are many fine words within the proposed policies there seems to be an almost total lack of objective targets. Without targets to be achieved there will be little incentive for developers to make progress where there may be additional costs. Housing Market. There are two fundamental problems within the UK housing market. <ol style="list-style-type: none"> The demand for housing is a totally free market but the supply of land for housing is regulated through planning controls. Therefore the price of land (and of the buildings on it) reflects the scarcity of land for building in the places where people wish to live. There are two different reasons for buying property. Some want to buy it for investment, others because they need somewhere to live. Over recent years the general economic trend has been for wealth to be accumulated by those owning assets rather than those in employment leading to inflation in asset values. In general, incomes have risen more slowly than house prices, pricing an increasing proportion of the population out of the possibility of home ownership. The question of how these market distortions should be addressed to provide enough good quality affordable homes sustainably for the whole population goes well beyond the Local Plan. No evidence has been presented that releasing more land for house building locally would change the relationship between local incomes and the local cost of housing in a way that meets the housing needs of the whole population. 	<ul style="list-style-type: none"> No overarching vision for sustainable development of the district and the various settlements within it. The lack of targets for climate change, waste, ect... No evidence has been presented that releasing more land for house building locally would change the relationship between local incomes and the local cost of housing in a way that meets the housing needs of the whole population. 	<p>Noted. The strategic vision will be updated to better reflect more widely those issues of significance for TRDC to help inform the Council's approach to sustainable development and in meeting its commitment to the climate change emergency agenda.</p> <p>Noted. The lack of targets</p> <p>Noted. The Councils SHMA provides a more detailed look at affordability and the relationship between incomes and local housing options and it is this evidence which will inform the housing policies.</p>	Re-look at overarching vision and make reference to climate change.
SC_000 24- Abbots Langley Parish Council	Abbots Langley Parish Council	Yes	I feel that the Government required figures were unadoptable within an area which has so much REQUIRED greenbelt under NPPF, the reduced planning proposed numbers are still too high (see previous dialogue) and they are also dated as they do not take into account the results of BREXIT, Covid and the redistribution of workers away from London. So YES, we do agree with not complying	<ul style="list-style-type: none"> Housing need figure still too high and does not take account of Green belt, Covid and Brexit. 	<p>Noted. The Government's standard methodology is based on long term trends. The Coronavirus is considered to be a short term trend and will not affect overall growth rates. In regards to Brexit, there is no clear evidence of the impacts that this has on the population changes. The Council will continue to monitor any changes to the government's standard methodology through the Annual Monitoring Report and its subsequent implications for Three Rivers Local Plan.</p>	No action
SC_000 26_HC C Growth and Infrastr ucture	HCC Growth and Infrastructure	Support	It is noted that the housing target for the local plan is 12,624 dwellings during the period 2018-2038, although this is reduced to 10,678 dwellings when taking into account completions between 2018-2020 (608 dwellings), commitments (948 dwellings) and a windfall allowance of 390. 8,973 dwellings will be delivered on the potential housing allocations that are identified in part 2 of the plan, which equates to 21.2fe. These fall within a mixture of tiers 1-3 when assessed against the county council's approach to calculating child yield. The county council has agreed the most appropriate tier for each site with Three Rivers District Council. The county council's comments are based on the proposed housing figure set out in the consultation. Were the dwelling numbers to increase to meet the Government's Standard Method housing need figure, the county council may need to seek further education allocations accordingly.	The housing target for the local plan, using the standard methodology is 12,624 dwellings during the period 2018-2038, although this is reduced to 10,678 dwellings when taking into account completions between 2018-2020 (608 dwellings), commitments (948 dwellings) and a windfall allowance of 390. 8,973 dwellings will be delivered on the potential housing allocations that are identified in part 2 of the plan, which equates to 21.2fe. Were the dwelling numbers need to increase to meet the Government's Standard Method housing need figure, the county council may need to seek further education allocations accordingly.	Noted.	No action
SC_000 27_TFL Comme rcial	TFL Commercial Development		Thank you for providing the opportunity to comment on the Three Rivers Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that	<ul style="list-style-type: none"> We have a portfolio of sites that we will be looking to develop in years to come in areas such as Croxley, Chorleywood and Rickmansworth. 	Noted	No action

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Development		<p>may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>TfL CD have engaged through the Local Plan preparation process and have submitted the following representations:</p> <ul style="list-style-type: none"> – Three Rivers Local Plan Issues and Options and Call for Sites (September 2017); – Three Rivers Five Year Supply of Land for Housing Assessment (December 2018); – Three Rivers Potential Sites (December 2018); – Three Rivers Five Year Supply of Land for Housing Assessment (November 2019); – Three Rivers Five Year Supply of Land for Housing Assessment (November 2020). <p>TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. We have a portfolio of sites that we will be looking to develop in years to come in areas such as Croyley, Chorleywood and Rickmansworth.</p> <p>All of TfL CD's projects are focussed on delivering optimal, high-quality housing (including genuinely affordable housing), workspace and public realm around stations, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice. TfL's recently adopted Design Principles, which apply to all its property development projects, is attached (Annex 1).</p> <p>TfL CD have also prepared a 'Sustainable Development Framework' (SDF) which consists of 120 Key Performance Indicators (KPIs) to monitor and grade the sustainability of TfL CD's residential schemes, ensuring that good practice is achieved as far as possible.</p> <p>Given TfL CD's land interests in Three Rivers and the major benefits that development can deliver, particularly in terms of new housing provision, it is critical for there to be a Local Plan in place that will enable such opportunities to be optimised.</p> <p>TfL CD Representations</p> <p>TfL CD broadly agrees with the proposed vision and objectives and, in particular, directing growth to the most accessible sustainable locations with good public transport and sustainable transport choices. We suggest that consideration is given to also integrating principles of good design in the objectives section, and Objective 3 should be stronger on taking opportunities to make effective use of land in urban areas, both of which would ensure consistency with the recent updates to the National Planning Policy Framework 2021 (NPPF). This will be critical to ensuring that growth is in the right location, is positive, that it benefits local residents and businesses, and that it creates attractive, strong neighbourhoods that people are proud to live in.</p> <p>TfL CD supports the Council's objective to create the conditions to deliver the District's objectively assessed needs. As set out in this letter, TfL CD can make significant contributions towards the Council achieving this.</p>	<ul style="list-style-type: none"> • Given TfL CD's land interests in Three Rivers and the major benefits that development can deliver, particularly in terms of new housing provision, it is critical for there to be a Local Plan in place that will enable such opportunities to be optimised. • TfL CD broadly agrees with the proposed vision and objectives and, in particular, directing growth to the most accessible sustainable locations with good public transport and sustainable transport choices. • We suggest that consideration is given to also integrating principles of good design in the objectives section, and Objective 3 should be stronger on taking opportunities to make effective use of land in urban areas, both of which would ensure consistency with the recent updates to the National Planning Policy Framework 2021 (NPPF). 	<ul style="list-style-type: none"> • Noted. • Noted. Amend objective 3 to integrate principles of good design. 	Re-look at objective 3 and make reference to integrating principles of good design in the objectives section.
SC_00028_Canal & River Trust	Canal & River Trust	<p>The Grand Union canal, which runs through the Three Rivers district, is a multi-functional asset and it straddles and crosses the administrative boundary in places, and it is important that the Local Plan takes full consideration of and appropriately addresses issues such as this.</p> <p>The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. It is encouraging that the consultation document acknowledges this with one of the Strategic Objectives identified being to conserve and enhance the Grand Union canal corridor.</p>	<ul style="list-style-type: none"> • Waterways can be used as tools in place making and place shaping and contribute to creation of sustainable communities; the consultation document should acknowledge this as a Strategic Objectives identified being to conserve and enhance Grand Union Canal Corridor 	<ul style="list-style-type: none"> • Support noted 	No action
SC_00029_Hertsmere Borough Council	Hertsmere Borough Council	<p>The document appears to be generally sound and consistent with national policy with the exception of the shortfall against the identified local housing need. Aside from this, the main spatial planning topics are suitably reviewed with comprehensive detail, and we welcome the direction of travel in relation to climate change. Further collaborative work on strategic cross boundary infrastructure remains a high priority, in particular sustainable transport options and water management.</p> <p>There is little reference to the provision of infrastructure in the Preferred Policy Options, and we could not see an up to date Infrastructure Delivery Plan amongst the evidence base documents. Infrastructure has been highlighted by local residents in Hertsmere as a key priority and we would expect growth in neighbouring authorities to clearly address infrastructure requirements, including where there are cross-boundary needs to be addressed.</p>	<ul style="list-style-type: none"> • Generally sound and consistent with national policy with the exception to the shortfall against the identified local housing need • Further collaborative work on strategic cross boundary infrastructure remains a high priority, in particular sustainable transport options and water management • Little reference to infrastructure in preferred policy options and no infrastructure delivery plan published which includes cross boundary needs to be addressed 	<ul style="list-style-type: none"> • Noted. The Government's standard methodology is based on long term trends. The Coronavirus is considered to be a short term trend and will not affect overall growth rates. In regards to Brexit, there is no clear evidence of the impacts that this has on the population changes. The Council will continue to monitor any changes to the government's standard methodology through the Annual Monitoring Report and its subsequent implications. • Collaborative work to continue in relation to cross boundary issues • Infrastructure is mentioned throughout the document. The Infrastructure Delivery Plan has 	No action No Action

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					not yet been completed as this is the early stage of the plan making process. The Infrastructure Delivery Plan will be published alongside the Regulation 19 consultation and will be informed by infrastructure providers and identify any strategic infrastructure required.	
SC_000 30_Highways England	Highways England		The Draft Local Plan identifies a number of 'strategic objectives', which provide an outline of what need to be achieved by each site to achieve the wider vision of the Local Plan and to address all key issues identified. These objectives underpin the spatial strategy, policies and proposals which are included within the Local Plan. Comments are requested on a series of strategic objectives covering a range of topics. These are presented as a series of questions in the Three Rivers submission report. Highways England has provided comments below on those relevant to the SRN.	<ul style="list-style-type: none"> • Provided comments on a series of strategic objectives relevant to SRN 	<ul style="list-style-type: none"> • Noted 	<ul style="list-style-type: none"> • None

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REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Q1. Do you think the Standard Method is the right approach?						
SC_0004_London Borough of Hillingdon	LB Hillingdon	No Objection	<p>I write further to your letter on 15th June 2021 regarding the Regulation 18 Consultation and our subsequent Duty-to-Cooperate meeting on 9th July 2021.</p> <p>I can confirm that there are no objections raised to be raised at this stage of the plan-making process. As outlined in the meeting, Officers will continue to monitor proposed changes to the Local Plan and the evidence base as they are brought forward. In particular, early notification of new evidence regarding the impact of the proposed growth on infrastructure and the road network would be welcomed.</p> <p>I can confirm that at this stage, the London Borough of Hillingdon is not in a position to accommodate any of Three Rivers unmet housing and employment need. Please also note that the Mayor of London, through his requirement to publish and review a Spatial Development Strategy (SDS) for London, remains responsible for apportioning housing targets to individual boroughs and therefore would need to be engaged in any further discussions about the potential to accommodate unmet need. At present, there remains a shortfall between the apportioned housing targets and identified need in the London Plan.</p> <p>Please keep us informed on all future opportunities to consult further on the Local Plan Review and thank you again for engaging with the Planning Policy Team</p>	<ul style="list-style-type: none"> London Borough of Hillingdon is not in a position to accommodate any of Three Rivers, unmet housing and employment need. It should be noted the Mayor of London, through his requirement to publish and review a Spatial Development Strategy (SDS) for London, remains responsible for apportioning housing targets to individual boroughs and therefore would need to be engaged in any further discussions about the potential to accommodate unmet need. At present, there remains a shortfall between the apportioned housing targets and identified need in the London Plan. 	<ul style="list-style-type: none"> Noted Noted and acknowledged that LB Hillingdon falls under the jurisdiction of the Mayor of London 	None
SC_P1_0008_Home Builders Federation	Home Builders Federation	Objection	<p>We do not agree with the Council's decision not to meet its minimum requirements for the delivery of new homes. The Council's position is that it cannot meet its housing needs due to the constraints it faces which in turn limits the amount of land for development within Three Rivers. We recognise that some of these constraints are absolute, such as the functional flood plain and Sites of Special Scientific Interest, however, the principal constraint facing the Borough is Green Belt, a constraint that can be removed from land by the Council in exceptional circumstances if the tests set out in paragraph 137 can be met. The Council consider that these tests have been addressed, a position we would agree with, and as such are proposing to amend Green Belt boundaries to deliver new homes. However, we would suggest that the circumstances faced by Three Rivers would justify further amendments to the Green Belt boundary to release more sites for development in order to meet housing needs in full. The reasons for our position are considered below.</p> <p>When considering whether or not constraints will prevent a Council from meeting its development needs it is necessary to consider whether there are exceptional circumstances to support their release and, as set out in paragraph 11 of the NPPF, whether there are strong reasons why the policies in the NPPF should restrict the overall scale of development or whether the adverse impact of meeting needs full significantly and demonstrably outweigh the benefits.</p> <p>4. As part of any such considerations it is therefore important to assess the relative benefits of meeting needs in full against the impact on the Green Belt and whether any harm can be mitigated. At present the Council have made assessments as to the impact of development on the purposes of Green Belt but not undertaken any assessment in this consultation with regard to relative benefits of a spatial strategy that would meet housing needs in full compared to the proposed spatial strategy. Whilst the Council do not consider relative benefits and disadvantages of alternative spatial strategies in this consultation or the supporting Sustainability Appraisal (SA) the Council have considered alternative levels housing development in the SA published in 2017 alongside the Issues and Options consultation.</p> <p>5. The 2017 SA sets out the findings of the assessment of the three housing growth options on page 14 and 15 and indicates that whilst lower levels of growth will have fewer adverse effects on the environment there are more social benefits from a higher level of housing delivery. The 2017 SA also notes for instance that higher growth levels could provide improved opportunities for environmental enhancements and infrastructure improvements. This would suggest that further considerations as to meeting needs in full, and the additional sites this would require, should have been considered as part of the preparation of the preferred policy options. The Council have</p>	<ul style="list-style-type: none"> Does not agree with Council's approach of not meeting minimum requirements. Further amendments to Green Belt boundary to release more sites in order to meet needs in full: Council has undertaken assessment of impacts of development on the Green Belt but not undertaken any assessment <i>in this consultation</i> with regard to relative benefits of a spatial strategy that would meet housing need in full compared to the proposed spatial strategy. Whilst benefits and disadvantages of alternative spatial strategies are not considered in this consultation the 2017 Issues & Options and SA published alongside is looks at 3 spatial options. Pages 14 and 15 indicates that lower levels of growth will have fewer adverse effects on the environment there are more social benefits from a higher level of housing delivery – could provide improved opportunities for environmental enhancements and infrastructure improvements which suggests that further considerations to meet needs in full and the additional sites requires should have taken place Part of this consideration is the acute need for affordable housing and market housing in the area due to slow progress of local plan since 2012 NPPF, 	<ul style="list-style-type: none"> Noted. The Government's standard methodology is based on long term trends. The Council will continue to monitor any changes to the government's standard methodology through the Annual Monitoring Report and its subsequent implications. 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". The Council will consider reasonable alternatives to the proposed spatial strategy that will meet housing needs in full in a further iteration of the SA. The LNHA (2020) uses the 2014-based projections in its calculation of the local housing need figure for the 2020-2036 period. The LNHA states at paragraph 1.15 that "the PPG states that local planning authorities should use the 2014-based household projections. This is instead of the more recent 2016-based projections which were seen as locking in more recent and thus more negative trends". Likewise, 	We should consider full and high growth as part of the next iteration of the SA

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			<p>seemingly alighted on their preferred option without properly considering the benefits and adverse impacts of meeting needs in full.</p> <p>A key part of any future assessment of alternative spatial strategies must be the acuteness of the need for both market and affordable housing in the Borough. Between 2018 and 2037 the Council state they should be seeking to deliver 12,624 new homes. During this period, the Council expect to deliver 10,919 new homes – some 1,705 homes short of the Government’s expectations. This is in addition to the slow preparation of its local plan following the publication of the 2012 NPPF which has also meant that the Council has failed to deliver the homes required to meet its objectively assessed housing needs. It has consistently delivered fewer homes than have been required to address the demographic baseline a position which has clearly impacted on the affordability of housing in the Borough, which has increased sharply over the last ten years. Since 2008 the lower quartile affordability ratio has increased from 9.88 to 14.85, the fourth worst area in terms of affordability for the whole of the East of England.</p> <p>In addition to the poor affordability of housing the Council’s delivery for affordable housing has been poor averaging just 54 units per annum over the last twenty years. Need for affordable homes is stated to be 350 dpa over the plan period yet even with a policy requiring 50% affordable housing on all residential development where there is a net gain, a policy we consider to be unsound, the Council will not meet this level of need. There is clearly an acute need for more housing in the district and one that must be a key consideration in any decision on whether or not to amend Green Belt boundaries to meet needs in full. Whilst increased supply will not on its own reduce the cost of housing it does have a role to play in reducing the rate at which it worsens – especially if the allocations come forward early in the plan period. It will therefore be essential that the Council consider the benefits of meeting housing needs in full and the consequences of achieving sustainable levels of development from constraining its land supply. The HBF would therefore suggest that the acuteness of the housing needs and affordability concerns in the district warrant amendments to the Green Belt boundary that would ensure housing needs are met in full.</p> <p>9. To conclude it is the HBF’s opinion that the Council must test reasonable alternatives to the proposed spatial strategy that will meet housing needs in full. This should have been considered as part of the latest iteration of the Sustainability Appraisal with the assessment of strategies that meet needs from additional sites removed from the Green Belt. Instead, the Council have alighted on a spatial strategy without any such considerations. This is a clear failing not only with regard to justifying the Councils decision not to meet needs in full but also with regard to the requirements of preparing a Sustainability Assessment to consider reasonable alternatives to the proposed strategy. Only by carefully and objectively considering the impacts, both positive and negative, of a variety of spatial strategies can the Council consider whether or not there are strong reasons for failing to meet its development needs in full.</p>	<p>proposal to deliver 1,705 less homes falls short of Governments expectations. Acute need for more housing in the District, the Council should consider meeting needs in full</p> <ul style="list-style-type: none"> • Council should test reasonable alternatives to the proposed spatial strategy that will meet housing needs in full which should be considered in the latest iteration of the SA • Failure of the Council to meet needs and requirements to prepare a SA to consider reasonable alternatives to the proposed strategy • Need for affordable homes is stated to be 350 dpa over the plan period yet even with a policy requiring 50% affordable housing on all residential development where there is a net gain, a policy we consider to be unsound, the Council will not meet this level of need. 	<p>any new calculations of the local housing need figure for future periods (e.g. from 2021 or from 2022) using the standard method will also use 2014-based projects.</p>	
SC_00012_D Dacorum Borough Council	Objecti on	<p>This Council acknowledges the difficulties of trying to comply with the national standard method in full given the substantial scale of unconstrained need arising from it and, in particular, the potential for the loss of extensive areas of Green Belt land. We also recognise that the South West Hertfordshire (SWH) authorities are all heavily constrained in meeting such levels of growth.</p> <p>We note that the draft Local Plan explains that Three Rivers District Council (TRDC) has taken a number of steps in order to meet its housing needs as fully as possible, including maximising the contribution from previously developed land, and we welcome this. However, we are aware that this falls short of meeting unconstrained needs in full (resulting in an unmet need of 1,705 homes over the plan period 2018-38). This also needs to be seen in the context of potential cumulative unmet needs arising in some of the other SWH authorities.</p> <p>Any lower level of growth than that generated by the standard methodology will obviously expose your Local Plan to challenge at the Examination stage, it will reduce your ability to tackle development needs in your district, you may be more susceptible to predatory planning applications, and it will reduce the flexibility of your overall housing supply in responding to demand and change in the housing market. As highlighted in our letter of 19 May 2020 in response to your earlier enquiry as to whether we could assist with meeting your unmet housing needs, we explained at the time that we were not in a position to meet the shortfalls of neighbouring authorities. Indeed, Dacorum is also facing its own severe challenges in achieving its identified need in full through its draft Local Plan.</p> <p>We note that you followed up this enquiry with another letter of 15 June 2021 in which you set out your latest position on meeting your local housing need. We have responded to this separately but in parallel with the consultation response. It overlaps with and reinforces our position on unmet housing need set out in this response.</p> <p>We appreciate that national government has been recently reinforcing the importance of the Green Belt in considering and setting housing targets in Local Plans. Furthermore, paragraph 11 of the NPPF does allow for local authorities to take into account protected areas of importance, such as the Green Belt, in weighing up the extent to which it can meet its objectively assessed needs. However, we consider that the draft Local Plan needs to provide further detailed evidence setting out why there are “strong reasons” for restricting the overall scale, type or distribution of development in the Three Rivers district area.</p>	<ul style="list-style-type: none"> • Recognise that all SW Herts authorities are constrained to meeting such levels of growth; • The figures below the standard methodology will be challenged at examination; • Query TRDC use of 2018 as the start date in your Plan. The start date should logically be 2020 to better align with the publish date of the Plan (and other emerging Plans in South West Hertfordshire) and while still allowing for at least 15 years from adoption. 	<ul style="list-style-type: none"> • Recognition of constraint to meet housing target noted • Understand DBC unable to assist with meeting TRDCs unmet housing needs. 	Local Plan timeframe to be updated to reflect NPPF guidance.	

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			<p>The Plan and its evidence base needs to be much clearer in explaining the actual harm arising from significant levels of growth (alongside the potential benefits new development can bring with it in addressing identified local issues (listed in paragraph 2.36 of the Local Plan)). This needs to be measured against the potential loss you have identified of “much-needed accessible open space” and how this impacts on the quality of life and wellbeing of your residents.</p> <p>We will of course welcome discussing this matter further with you as part of our regular engagement under the Duty to Co-operate (DtC) process.</p> <p>Linked to your housing requirement, we would also query your use of 2018 as the start date in your Plan. We would argue that the start date should logically be 2020 to better align with the publish date of the Plan (and other emerging Plans in South West Hertfordshire) and while still allowing for at least 15 years from adoption. Such an approach is consistent with the guidance in the PPG on Housing and Economic Needs Assessment. The PPG states (paragraph 004) that the current year should be the starting point and that there is no need to take account of past under delivery of new homes in preparing plans (paragraph 011).</p>			
SC_00015_Kings Langley Parish Council	Kings Langley Parish Council	Objecti on	<p>In responding to Three Rivers District Council's (TRDC's) draft Local Plan, Kings Langley Parish Council would like to draw particular attention to the 3 sites located immediately to the east of our village which is nevertheless considered by many to be part of Kings Langley. It has also been described in many TRDC planning documents as such. There has been a significant level of development between Kings Langley Station and Lower Road in what was previously a TRDC Employment Area. Planning approval has already been given for around 500 dwellings along this corridor e.g. Pinnacle House, West Herts College, Alpine Press and now almost 1,000 dwellings and primary school are being considered, all of which are on Green Belt.</p> <p>The proposals for the development of so much Green Belt land for so many houses take no account of the major changes wrought by the pandemic and Brexit on retail, office and commercial premises, particularly in town centres. Their impact has created, and will continue to create, opportunities for the conversion of unused and empty town centre commercial space for housing as a result of changes in shopping and working practices.</p> <p>In addition, the draft Local Plan also uses ONS data from 2014 rather than from 2018; the later projections show a reduction in housing demand which is not reflected or acknowledged in TRDC's document.</p> <p>Furthermore, the National Planning Policy Framework (NPPF) also permits TRDC to restrict the scale of development due to acceptable planning constraints such as the Green Belt. No attempt appears to have been made to mitigate the large-scale destruction of TRDC's Green Belt.</p>	<ul style="list-style-type: none"> • There has been significant levels of development between Kings Langley station and Lower Road in what was previously a TRDC Employment Area. All of which fall within the Green belt. Proposals for the development of so much Green Belt land for so many houses take no account of the major changes wrought by the pandemic and Brexit on retail, office and commercial premises, particularly in town centres. • Draft Local Plan also uses ONS data from 2014 rather than from 2018; • NPPF permits TRDC to restrict the scale of development due to acceptable planning constraints such as the Green Belt. No attempt appears to have been made to mitigate the large-scale destruction of TRDC's Green Belt. 	<ul style="list-style-type: none"> • The LNHA (2020) uses the 2014-based projections in its calculation of the local housing need figure for the 2020-2036 period. The LNHA states at paragraph 1.15 that “the PPG states that local planning authorities should use the 2014-based household projections. This is instead of the more recent 2016-based projections which were seen as locking in more recent and thus more negative trends”. <i>Likewise, any new calculations of the local housing need figure for future periods (e.g. from 2021 or from 2022) using the standard method will also use 2014-based projects.</i> The LNHA also undertook the analysis of what the profile of households might be (i.e. housing mix) with dwelling delivery in line with the Standard Method (Table 62 on pg. 124 of the LNHA). • Noted, 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”. 	No action
SC_00019_Watford Borough Council	Watford Borough Council	Objecti on	<p>Further clarity should be provided about the justification for why the authority is not able to meet is housing need. It would be useful to have further explanation about the approach to Green Belt release and how the assessment has been used to determine what sites should be included or excluded from the draft Local Plan. If Green Belt release is not the preferred option, then setting out a proactive approach to intensification within existing built up areas and proposed site allocations should be set out. This approach should focus on sustainability and maximise locations that have good access to services and facilities and incentivise windfall development within built-up areas if site allocations are not available. As such, consideration could be given to the proposed windfall figure and if this is adequate to support the level of growth that may be required during the plan period should the proposed housing figure calculated using the governments standard method not be achievable. Greater clarity would be welcomed setting out the approach taken to determine site capacity (and housing numbers) on site allocations Site capacities proposed vary between 35-90dph within an area but it is unclear how this has been determined and if the capacities are indicative. The Council could consider higher site capacities, more specifically in locations where there is good access to services and facilities which support sustainable development, that would help reduce pressure for further Green Belt release as part of this plan moving forward and in the longer term, particularly if the plan does not set out an approach that will meet its challenging housing requirement in full, as calculated using the governments standard method</p>	<ul style="list-style-type: none"> • Further clarity should be provided about the justification for why the authority is not able to meet is housing need as calculated using the government's standard method. • It would be useful to have further explanation about the approach to Green Belt release and how the assessment has been used to determine what sites should be included or excluded from the draft Local Plan • Greater clarity would be welcomed setting out the approach taken to determine site capacity (and housing numbers) on site allocations Site capacities proposed vary between 35-90dph within an area but it is unclear how this has been determined and if the capacities are indicative. 	<ul style="list-style-type: none"> • Noted. The council has produced a housing delivery Plan which sets out the steps the council has taken towards improving housing supply and delivery of key sites. It is agreed that Paragraph 63 of the NPPF advises that affordable housing should not be sought for minor residential developments. However, the local circumstances in Three Rivers are considered to justify an alternative approach to require all developments resulting in a net gain of housing to contribute to affordable housing provision. This is on the basis of the acute need for affordable housing in the District demonstrated by the LHNA, and the crucial role that smaller sites delivering fewer than 10 dwellings has played in delivering housing historically which is expected to 	No action

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					<p>continue in future. These factors are considered to outweigh the guidance within the NPPF and justify the approach within the Affordable Housing Policy to require all sites resulting in a net gain of dwellings to contribute to affordable housing provision in the District, and this approach has been supported in recent appeal decisions in the District. The Council is currently applying this position as per Policy CP4 of the Core Strategy (2011) and given the Evidence Relating to the Application of the Affordable Housing Threshold document, published at: https://www.threerivers.gov.uk/e-gcl-page/making-an-application</p> <ul style="list-style-type: none"> • Noted, 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". Please refer to the GB Assessment 2019. • In relation to optimising capacity of brownfield sites, an Urban Capacity Study has been undertaken to identify available and suitable sites and all deliverable/developable brownfield sites have been included in the Regulation 18 consultation. Preferred Policy Option 3 also seeks a significant uplift in densities and it is recognised that housing should come forward at a density which makes efficient use of land, for the potential of sites included in the Regulation 18 consultation, higher DPH thresholds were applied to brownfield sites sustainable locations, alongside consideration of other constraints present on sites. DPH is indicative and proposed dwellings may be proposed as higher or lower at the planning application stage once more detailed design matters are considered. 	
SC_00021_Buckinghamshire Council	Buckinghamshire Council	Objecti on	<p>Buckinghamshire Council seeks to support Three Rivers District Council in taking appropriate steps to meeting its own development needs from within TRDC's own area. It is noted that from 2018 to 2038 Three Rivers needs to provide 8,793 homes (against a residual target of 10,678 based on the Government's standard methodology). The position is 1,705 homes below the target.</p> <p>It is important that Buckinghamshire Council makes its own position clear on this. If a Local Plan cannot meet its own needs this can put pressure on other areas to accommodate them.</p> <p>The Buckinghamshire Local Plan is at a very early stage of preparation and the level of needs which it will have to accommodate is not yet known. Also the Council does not yet have the evidence to establish if it can accommodate its own housing needs from Buckinghamshire.</p> <p>It is not possible to re-assess the level of needs being accommodated in Buckinghamshire under the previous round of Local Plan preparation. The Council has an adopted Local Plan covering the former Wycombe area. It also has an advanced stage Local Plan for the former Aylesbury area, the Vale of Aylesbury Local Plan. The Inspector's report on that Local Plan is due to be published very soon. The</p>	<ul style="list-style-type: none"> • There is no agreement to accommodate the unmet housing needs of the Three Rivers area within Buckinghamshire. 	Noted. Buckinghamshire cannot meet TRDCs unmet housing need.	No action

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			<p>emerging Local Plan covering the former Chiltern and South Bucks area was withdrawn by the Council in October 2020.</p> <p>Given the above, there is no agreement to accommodate the unmet housing needs of the Three Rivers area within Buckinghamshire.</p>			
SC_00 023_C Croxley Green Parish Council	Croxley Green Parish Council	No objection	<p>Government policy and more recent guidance has placed a much stronger emphasis on the need to take account of local circumstances and protection of the Green Belt. It clearly states that Government policy allows for adjustment of the number of new dwellings required from the Housing and Economic Needs Assessment to allow for local circumstances and the protection of the Green Belt. It appears to us that Three Rivers District Council has stuck to the outdated approach in Housing and Economic Needs Assessment and based the Local Plan on the PPG "The standard method set out below identifies a minimum annual housing figure" without going on to consider the local constraints including the extent of the Green Belt within Three Rivers. We believe that, in view of the constraints within the District, the District Council should challenge the Government's Standard Method more robustly and use up to date data to calculate the requirements, rather than basing the figure on historic information.</p> <p>We believe that the decision to leave the European Union (Brexit) and the Covid19 pandemic have significantly changed the demand for housing and that due allowance should be made for these changes. Proximity to a wide range of employment has been a strong factor in the demand for housing around the London metropolitan fringe, including Three Rivers District. People desire to live within commuting distance of their places of work. One of the consequences of Brexit seems to be a translocation of employment from London to other European cities which may well reduce demand locally. The recent pandemic has led to an acceleration of the trend for people to work from home or remotely from main offices, particularly in the knowledge based industries and it appears the change may cause permanent changes in the demand for housing in different parts of the country. If the need for regular commuting is reduced, this could have a substantial impact on the housing market, as lifestyle choices takes priority over commutability.</p> <p>In general Croxley Green Parish Council supports the need for more affordable housing within the district and, where possible and acceptable, within the parish area of Croxley Green. We support the principle of the District Council's approach, but consider it does not go far enough. We are totally opposed to the use of the Government's Standard Methodology for calculating housing need in Three Rivers or in Croxley Green. We note that the ONS projections for population and households show a continuing reduction in the rate of growth and consider that up to date figures should be used to estimate future housing needs. We consider that trends underlying recent reduced ONS projections of population and households will continue and that the new standard method considerably over-estimates the underlying need for more dwellings in Three Rivers. We consider that the District Council has given insufficient evidence for the reasons for reducing the residual housing number from 10,678 to 8,973 dwellings over the period 2018 to 2038. We consider the dwelling requirement for the period could be reduced considerably further. The recent National Census will provide further evidence of population change and the extent of the need for more dwellings. We consider the Local Plan should take these figures, when published, into account.</p> <p>We believe that the District Council should carry out detailed reviews of what can be built within each settlement without causing harm or encroachment onto undeveloped Green Belt land.</p> <p>We agree with the District Council that the Government's Standard Method for calculating the District's housing need is not appropriate in Three Rivers District. We agree that a modified approach is required and we support the inclusion of: (a) Completions 2018 to 2020 (b) Commitments (unimplemented planning permissions) (c) An allowance for windfall developments</p>	<ul style="list-style-type: none"> Support the District Council that the Government's Standard Method for calculating the District's housing need is not appropriate in Three Rivers District, but consider the councils approach does not go far enough taking account of the ONS projections for population and households showing a continuing reduction in the rate of growth and consider that up to date figures should be used to estimate future housing needs. We consider that the District Council has given insufficient evidence for the reasons for reducing the residual housing number from 10,678 to 8,973 dwellings over the period 2018 to 2038 and the dwelling requirement for the period could be reduced considerably further. Requires TRDC to carry out detailed reviews of what can be built within each settlement without causing harm or encroachment onto undeveloped Green Belt land. Support a modified approach to the Standard Methodology is needed and the inclusion of: (a) Completions 2018 to 2020 (b) Commitments (unimplemented planning permissions) (c) An allowance for windfall developments. 	<ol style="list-style-type: none"> Noted. The Council recognises its housing need target is out of date and will be updated to reflect the latest Census 2021 results in accordance with the government's standard methodology. TRDC does not have sufficient available land to meet its housing needs over the plan period and as such has undertaken call for sites exercises and Strategic Housing and Employment Land (SHELAs) capacity studies to identify additional sources of land to meet housing needs over the plan period. 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". 	Ongoing
SC_00 024- Abbots Langley Parish Council	Abbots Langley Parish Council	No objection	<p>I feel that the Government required figures were unadoptable within an area which has so much REQUIRED greenbelt under NPPF, the reduced planning proposed numbers are still too high (see previous dialogue) and they are also dated as they do not take into account the results of BREXIT, Covid and the redistribution of workers away from London. So YES, we do agree with not complying with the standard methodology</p>	<ul style="list-style-type: none"> Support TRDC's approach to not adopt the governments standard methodology but still thinks the Housing need figure is too high and does not take account of Green belt, Covid or Brexit. 	Noted.	No action

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SC_00 025_St . Albens City and District Council I	St. Albans City and District Council	Objecti on	<p>SADC does not support the consultation version of the TRDC Local Plan that has now been published, as a result of the 25 May 2021 TRDC Council motion including: ... a. Omit the 'contingency' sites which are not required to achieve the target numbers; b. Omit sites CFS21 & CFS26a which would cause particular harm to existing communities and residents' quality of life without providing compensating benefits to the community.</p> <p>SADC has not seen any evidence to justify the approach taken that amends the original draft Plan from one which meets housing need in full (and with an appropriate 'buffer' as required) to one with a 1,705 home shortfall (and without an appropriate 'buffer' as required). In these circumstances, SADC raises this housing need shortfall as a very significant 'soundness' concern and must also flag now that this issue has the potential to become a 'Duty to Cooperate' objection at a future Examination in Public. It is wholly recognised that TRDC are still at an early stage in your Plan making and that TRDC is transparently raising these issues at the earliest opportunity. SADC hope that these issues can be successfully resolved in due course.</p> <p>As potentially part of TRDC's way forward on the housing need issue, we suggest further consideration is given to how most appropriately calculations of housing need and delivery should be based. We acknowledge that this is a complex area. Based on the Planning Practice Guidance (as below) and as raised briefly in previous South West Herts officer discussions and in discussion on 12 July 2021, SADC suggests further thought is given to both the most appropriate Local Plan start date and also the most appropriate date from which to calculate delivery against the 'Standard Method' number. This includes consideration of when the Plan is likely to reach Regulation 19 publication and to be submitted for Examination.</p> <p>Where local housing need (LHN) is being calculated using the standard method there is a clear expectation that there is no need to take into account any historic under-delivery. The affordability adjustment of the standard method already requires strategic policy-making authorities to apply an uplift in circumstances where there has been historic under delivery. LHN identified using the standard method can be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination. It would therefore be logical and prudent for the LHN calculation underpinning a Local Plan to be updated as close to the date of Publication (Regulation 19) as possible. Where an alternative approach to the standard method is used, past under delivery should be taken into account.</p> <p>Paragraph: 011 Reference ID: 2a-011-20190220 Revision date: 20 02 2019 We are also aware of the informal view expressed in several forums that: Local Plan period start date National planning policy and guidance is clear that strategic policies should extend for at least 15 years from the date of adoption of the Local Plan. However, there is no specific guidance on when a plan period should start, indicating that local authorities may have a degree of discretion on this issue.</p> <p>For the avoidance of doubt, as raised previously in Duty to Cooperate discussions and again on 12 July 2021, SADC currently considers that it has no capacity to meet any of Three Rivers District Council's (TRDC's) unmet housing needs. The district has 81% of its area designated as Green Belt.</p>	<ul style="list-style-type: none"> Does not support the approach taken within the TRDC local plan to housing need as there is no evidence to justify the approach taken and raises issue of soundness and potential concerns which will become a DTC issue. SADC suggests further thought is given to both the most appropriate Local Plan start date and also the most appropriate date from which to calculate delivery against the 'Standard Method' number. SADC currently considers that it has no capacity to meet any of Three Rivers District Council's (TRDC's) unmet housing needs. The district has 81% of its area designated as Green Belt. 	Noted.	Adjustment to the start date will need to be made going forward. Where an alternative approach to the standard method is used, past under delivery should be taken into account as this will impact on affordable housing delivery.
SC_00 027_T FL Comm ercial Develo pment	TFL Commercial Development	No objecti on	<p>TfL CD support part 2 of this policy, which notes that the Council will work proactively with applicants to find solutions that mean that proposals can be approved wherever possible. We also particularly support the following criterion:</p> <ul style="list-style-type: none"> Criterion 3c - Make efficient use of land by prioritising development on previously developed, brownfield land and incorporating mixed-use development wherever possible Criterion 3d - Optimise the use of land including through an uplift in the density of development where appropriate. Criterion 3l – Reduce the need to travel by locating development in accessible locations and promoting a range of sustainable travel modes with priority given to cycling and walking. 	<ul style="list-style-type: none"> Support the policy 	Noted	No action
SC_00 029_H ertsme re Boroug h Counci l	Hertsmere Borough Council	Objecti on	<p>A primary concern is the under provision of homes against the housing target. The Preferred Options document plans for 10,919 homes against a target of 12,624 homes which represents a 14% deficit. It may be possible for this to be addressed, at least in part, by changing the start year of the Local Plan period from 2018 to 2022/23. This would effectively remove 4 years of housing requirements equating to a reduction of around 1,900 homes on the total housing target over the plan period. Although government policy/guidance on Local Plan start dates is not clear, the principal requirement is to plan for a minimum 15 year period from adoption; previous years' housing requirements are effectively addressed through the national standard method. We would request that the housing shortfall in your Preferred Options is addressed given that all authorities in the South West Herts Housing Market Area are facing the same pressures to accommodate housing need.</p>	<ul style="list-style-type: none"> Housing shortfall in the preferred options should be addressed Consider changing the start date of the local plan. This would effectively remove 4 years of housing requirements equating to a reduction of around 1,900 homes on the total housing target over the plan period. 	Noted.	Adjustment to the start date will need to be made going forward.

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Q2. Do you think the Preferred Policy Option for meeting the presumption in favour of sustainable development is the right approach?							
SC_P1_00 007_Sport England	Sport England	Yes	<p>Support is offered for strategic objectives 4, 6, 10, 11 and 15 in particular as they would support opportunities for sport and physical and encourage active and healthier lifestyles.</p> <p>The objectives would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy. However, it is suggested that strategic objective 11 is strengthened by making reference to the contribution that green infrastructure can make to address the impact of climate change. Support is offered for the preferred policy option especially part 3 (k), (l) and (m) as these require development to take into account the protection of community sports facilities, the promotion of active travel and the infrastructure that encourages sport/physical activity in development. This part of the policy would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy. Notwithstanding the general support for policy option 1, part 3(n) of the policy should add 'encourage active lifestyles' to the list of purposes of promoting buildings and public spaces of a high enduring design quality as the design of buildings/spaces can directly encourage people to be physically active. This would be consistent with the Local Plan's 'Strategic Objective 15' which confirms that the way we plan and design places has a significant influence over whether communities are able to live healthy lives which includes being physically active.</p> <p>Housing.</p>	<ul style="list-style-type: none"> Support strategic objectives 4,6,10,11 and 15 accords with NPP paras 91 and 92 Suggest strategic objective 11 is strengthened by making reference to the contribution that green infrastructure can make to address the impact of climate change. Support is offered for the preferred policy option especially part 3 (k), (l) and (m) as these require development to take into account the protection of community sports facilities Notwithstanding the general support for policy option 1, part 3(n) of the policy should add 'encourage active lifestyles' to the list of purposes of promoting buildings and public spaces of a high enduring design quality as the design of buildings/spaces can directly encourage people to be physically active. 	<ul style="list-style-type: none"> Noted Noted. Additional wording to be added to Strategic Objective 11 Noted Noted. Additional wording to be added to Policy Option 1, part 3 (n) 	<ul style="list-style-type: none"> Additional wording to Strategic Objective 11: 'Provide a coherent network of Green Infrastructure that will continue to support the natural Environment and to contribute to address the impact of climate change along with human health and wellbeing.....' Additional wording to be added to policy 3 n) 'Promote buildings and public spaces of a high enduring design quality that respect local distinctiveness, are accessible to all, and reduce opportunities for crime and anti-social behaviour and encourage active lifestyles.' 	
SC_P1_00 022_Envir onment Agency	Environm ent Agency	Support ive	<p>Overall, Policy Option 1 seeks to ensure sustainable development in the area. We are pleased to see that tackling climate change, green infrastructure and the conservation of the various river corridors in the District have been identified as key issues and strategic objectives. Supporting sustainable development through the plan will contribute to tackling the climate emergency, as declared by the council in 2019.</p> <p>With regards to the strategic objectives of this policy, we are supportive of the inclusion of better opportunities for walking and cycling (Objective 6), the links made between green infrastructure and health and wellbeing (Objective 11), and the recognition river corridors as important assets to be conserved and enhanced (Objective 12).</p> <p>We believe the following changes will help improve the policy and ensure that sustainable development is achievable in line with your Local Plan</p> <p>We feel that the wording of Objective 9 could be strengthened by making the following change: "encouraging ensuring the use of water efficiency measures".</p> <p>Within Objective 11, we believe there is a possibility to explore green engineering to allow for further connectivity between green spaces within the borough.</p> <p>Objective 12 would benefit from acknowledging the Chalk Rivers that are within the district. Chalk streams, such as the Gade and Chess, are recognised as being amongst the most threatened habitats that require urgent conservation action in the UK Biodiversity Action Plan. The rarity and distinctiveness of Chalk Rivers supports some of the UK's most endangered species.</p> <p>A key part of protecting river corridors is the inclusion of buffer zones. We request a minimum of 8m for new developments but we would encourage policies which request larger buffer zones, particularly along Chalk Rivers.</p> <p>Within preferred Policy Option 1, we recommend several changes to ensure a robust and effective policy.</p> <p>We would recommend including reference to Biodiversity Net Gain within Point 3(f), in line with paragraph 170 of the NPPF. Development should ensure that no net loss of biodiversity and where possible ensure a net gain is achieved. We recommend adding the following wording to the end of this point, '...taking into account the need for biodiversity net gain.'</p> <p>Point 3(m) should also include 'flood risk' within the list of infrastructure to achieve sustainable development. This should be included in line with paragraph 160 of the NPPF, to ensure development is appropriate, protects the lives of the users and ensure flood risk is not increased elsewhere.</p>	<ul style="list-style-type: none"> Pleased to see that tackling climate change, green infrastructure, conservation of various river corridors have been identified as strategic objectives Supportive of Objective 6, Objective 11 and Objective 12 Suggest changes to Objective 9 to read 'encouraging ensuring the use of water efficiency measures' We believe there is a possibility to explore green engineering to allow further connectivity between green spaces within the borough Objective 12 would benefit from acknowledging the chalk rivers within the District (Gade and Chess) We request a minimum 8 metre buffer to rivers but would encourage policies which request larger buffer zones particularly along chalk rivers Proposes several changes to Overarching Policy on Sustainable Development: 	<ul style="list-style-type: none"> Noted Support noted Agreed. Proposed change to Strategic Objective 9 'encouraging ensuring the use of water efficiency measures' Noted Objective 12 recognises the importance of all river corridors (Gade and Chess included) - whilst we recognise the importance of Chalk Rivers it is not necessary to specify this in the objective as all river corridors are important assets regardless of their designation. No changes required. Policy Option 15 Flood Risk and Water Resources at j) requires a minimum distance of 8m from a main river (as defined by the Environment Agency) and a minimum distance of 5m from any watercourse. No changes required. The Environment Agency will be consulted on any planning applications in the vicinity of main river/watercourse and can provide comments on suitable buffer distances from any chalk river at the planning application stage. 	<ul style="list-style-type: none"> Change to Strategic Objective 9 to read '....reduce the amount of waste going to landfill and encouraging ensuring the use of water efficiency measures....' No change No change Additional wording to be added to Overarching Policy on Sustainable Development (3) 	

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				<ul style="list-style-type: none"> (3) f) should include reference to Biodiversity net Gain and recommend the following wording to be added at the end of the point, '...taking into account the need for biodiversity net gain.' (3) m) should also include 'flood risk' within the list of infrastructure in line with paragraph 160 of NPPF 	<ul style="list-style-type: none"> Agreed. Additional wording to be added to Overarching Policy on Sustainable Development (3) f) Agreed. Additional wording to be added to (3)m) 	<p>f) Protect and enhance our natural, built and historic environments from Inappropriate development and improve the diversity of wildlife and habitats taking into account the need for biodiversity net gain.</p> <ul style="list-style-type: none"> Additional wording to be added to (3) m) Provide necessary infrastructure to enable and/ or support development, including (but not limited to) transport, education, health, Green Infrastructure, flood risk, utilities, waste facilities, waste water, leisure, cultural and Community facilities.
SC_00023	Croxley Green Parish Council	No	<p>Croxley Green Parish Council notes that policies 1(1) and 1(2) are general statements about the Council's intent as the local planning authority and support the approach. However, there are no standards or metrics by which any of these policies are to be judged or measured. The detail of how they are to be applied lies in the extent to which the rest of the proposed Local Plan develop the aspirations into practically applicable policies and how effectively they can be applied to individual development proposals to deliver the listed aspirations. CGPC have attempted to match the rest of the proposed policies in the Plan to the requirements identified in 3(a) and found that some of the requirements are not elaborated in individual policies or quantified elsewhere.</p> <p>In general we do not think the preferred policy option goes far enough. It is reactive and unambitious. Alternative options could be considered, with an indication of what a more ambitious policy could achieve.</p> <p>Suggests it may be helpful to order the strategic objectives in three groups: • Environmental objectives • Social objectives • Economic objectives And to link these more specifically to the policies in the document.</p> <p>The overall policy does not recognise the need for additional infrastructure to support the level of development proposed and the constraints on providing it to meet the current and future needs within the District. It should specifically reference the climate emergency and identify the policies required to deliver the actions to respond effectively.</p> <p>There is no specific mention of the objectives of the Green Belt and other designated areas and we consider an additional policy objective could be inserted: "To protect and enhance the Green Belt and rural areas and support farming, rural businesses, and countryside recreation." How does the Council intend to measure 3(a) and what targets specifically will it set for property developers? How will these be enforced if not delivered in accordance with approved plans?</p> <p>At 3(b), will the use of separate sites to achieve sustainable drainage be allowed as part of development?</p> <p>At 3(c), How will biodiversity on previously developed land be measured and how will developers be held to account to not reduce biodiversity metrics?</p> <p>At 3(d), Whilst building at a higher density can be sustainable, where there are good transport links and access to nearby services, higher density development alters the character of the neighbourhood and generates a need for more public access open space and places for recreation and community activities. The key test will be "where appropriate" – no criteria have been proposed.</p> <p>The aspiration at 3(e) is meaningless unless specific targets are set in preferred policy option 18 for places where defined building materials are found to be present at the site.</p> <p>At 3(f), what specifically is the Council proposing to do to improve the diversity of wildlife and how will it measure achievement? Without specific measurements and targets this 'policy' is only aspiration.</p> <p>Delivery of 3(g) comes through preferred policy options 2 and 4.</p> <p>At 3(k), the council should act on the wishes of the community when protecting and enhancing existing community facilities, not simply deciding what it thinks is appropriate.</p>	<ul style="list-style-type: none"> Support the approach in general, the reasons given for why this is the District Council's preferred policy option sets out a range of priorities and good intentions without specific targets or proposals for how the priorities and good intentions are to be achieved. 	<p>The sustainable development theme runs throughout the local plan and individual chapters deal with policy on Climate change, Green Belt, floodrisk, biodiversity, loss of social and community facilities. The Council through its Authority Monitoring Report monitors gains and losses in different uses.</p>	<p>We need a section on monitoring within the plan</p>

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SC_00024 _Abbots Langley Parish Council	Abbots Langley Parish Council		We would prefer a progression ensuring that all new construction is REQUIRED to be sustainable, we need to enforce the policy rather than have it as a preference. The reality is that the constructions of houses is required under Government legislation, so sustainable or not they will be built. The council should set the baseline at sustainable before the design is started or the site acquired. Too much of this statement suggests 'wouldn't it be nice', and as we have seen since Government Policy Change, all renewables covered by condition on new housing, were removed during construction. We have to have a non-negotiable starting point within the District.	<ul style="list-style-type: none"> All new construction is required to be sustainable as a starting point 	Agreed. A new policy/ guidance is required on sustainable design and construction.	Noted. The Building Regulations set out statutory standards residential developments are to meet. These standards cover measures including energy efficiency, water efficiency, sanitation, fire safety, sound resistance and ventilation. Part L of the Building Regulations covers energy efficiency and sets out the maximum carbon dioxide occupied buildings are to emit. New residential developments are required to adhere to Part L of the Building Regulations.
SC_00026 _HCC Growth and Infrastructure	HCC Growth and Infrastructure	No objecti on	<p>SECTION 2: BACKGROUND AND CONTEXT Transport. It is recommended that further engagement with rail service providers is undertaken, as this would be beneficial to the local plan. HCC welcomes the identification of key bus route destinations within the district, as it gives an approach for sustainable transport policy. The definition of 'Traffic' should be clarified i.e. is it forecast to be a 15.6% increase in journeys being made, private vehicle trips, journey time delay, or traffic meaning just private cars? It should be recognised here that many of the users of sustainable transport options such as buses and cyclists are directly impacted by congestion itself (with the term congestion often discussing just private vehicle impacts). 'Congestion' causes significant issues to public transport services and will have major negative impacts to walking and cycling as viable options, even if only a short section of a journey's route is impacted. Identifying these areas and prioritising sustainable modes can have a significant impact to the quality of provision for those sustainable trips, enabling journeys to be made without the use of private car. Identifying these points and rebalancing the network to sustainable modes is the best approach to improving transport for all modes by reducing inefficient use of private vehicles, so trips that need to be made by car still can. A significant change in the way people travel will be required during the plan period, site location and network infrastructure is recognised as being a main issue and should be addressed within the plan.</p> <p>SECTION 3: PART 1: PREFERRED POLICY OPTIONS Our Vision Paragraph 3.3 It is considered that the word "endeavour" is not robust or aspirational, and the second sentence is not as emphatic as the first. Given the NPPF's emphasis on good design, the national design guide and emphasis on design coding, it is expected that a stronger indication of direction and intent to retain local character and distinctiveness.</p> <p>Strategic Objective 1 Design quality should be referred to in strategic objective 1.</p> <p>Strategic Objective 6 HCC welcomes the emphasis on strengthening active travel and public transport networks and improving people's opportunities for sustainable travel. This approach should be furthered by exploring opportunities to reduce travel in the private car. The transport strategy for the plan would need to be led by properly prepared evidence.</p> <p>Strategic Objective 9 Energy efficient design and climate change resilience should be referred to in this objective and the following amendments have been suggested: "Three Rivers has declared a climate emergency and it is essential that the problem of climate change is tackled at all levels, including the local. This means designing, constructing and reusing buildings and materials to minimise the use of <u>energy for heating and cooling</u>, natural resources and reduce the amount of waste going to landfill and encouraging the use of water efficiency measures and a reduction in water consumption, in order to protect future water supply. ... It also means dealing with the effects of <u>temperature increases</u>, extreme weather and potential flood risk through appropriate <u>building and public realm</u> design and siting of development."</p> <p>The explanation beneath this strategic objective S09 states "air pollutants (including dust and odour) have been shown to have an adverse effect on both health and the environment and it will be important to consider emissions arising from development including indirect emissions, such as those attributable to associated traffic generation." In addition, it is important to consider the siting of new developments in terms of their proximity to existing sources of air pollution (busy roads, industrial sites etc). It is considered that this comment is equally relevant to 'Strategic Objective 7: Reduce the need to travel by locating development in sustainable and accessible locations.'</p> <p>Strategic Objective 11. The correct nomenclature is Local Wildlife Sites. There should also be a reference to protecting priority species and habitats in the district and using Biodiversity Net Gain to support and manage the increase of the area and richness of biodiversity in the District and surrounding areas. The stated benefits of this objective could be strengthened by adding that improved green infrastructure can contribute to combatting the effects of climate change by improving air quality, cooling areas impacted by heatwaves, and reducing the severity of flooding.</p>	<ul style="list-style-type: none"> It is recommended that further engagement with rail service providers is undertaken, as this would be beneficial to the local plan. The definition of 'Traffic' should be clarified i.e. is it forecast to be a 15.6% increase in journeys being made, private vehicle trips, journey time delay, or traffic meaning just private cars? Vision -Paragraph 3.3. The word "endeavour" is not robust or aspirational, and the second sentence is not as emphatic as the first. Given the NPPF's emphasis on good design, the national design guide and emphasis on design coding, it is expected that a stronger indication of direction and intent to retain local character and distinctiveness. S01- Design quality should be referred to in strategic objective 1. S06- HCC welcomes the emphasis on strengthening active travel and public transport networks and improving people's opportunities for sustainable travel. This approach should be furthered by exploring opportunities to reduce travel in the private car. The transport strategy for the plan would need to be led by properly prepared evidence. S09 Energy efficient design and climate change resilience should be referred to in this objective and has suggested amendments. Minerals & Waste Planning. Supports the wording of this strategic objective. S011- The correct nomenclature is Local Wildlife Sites. There should also be a reference to protecting priority species and habitats in the district and using Biodiversity Net Gain to support and manage the increase of the area and richness of biodiversity in the District and surrounding areas. The stated benefits of this objective could be strengthened by adding that improved green infrastructure can contribute to combatting the effects of climate change by improving air quality, cooling areas impacted by heatwaves, and reducing the severity of flooding. S014 -The objective is not specific enough for older persons accommodation and the importance in 	<ul style="list-style-type: none"> Noted. Clarification will be provided on the definition of transport within the context of this paragraph? Vision – make stronger reference to design to reflect retaining local character and distinctiveness. Amendments to Strategic objectives to better reflect the Councils intent. Amendments to paragraph 3 I), 4.5, 4.7 and 4.8. 	<p>TRDC to continue ongoing Dtc discussions with HCC</p> <p>Amendments to vision, strategic objectives.</p> <p>S09 the following amendments have been suggested:</p> <p>"Three Rivers has declared a climate emergency and it is essential that the problem of climate change is tackled at all levels, including the local. This means designing, constructing and reusing buildings and materials to minimise the use of <u>energy for heating and cooling</u>, natural resources and reduce the amount of waste going to landfill and encouraging the use of water efficiency measures and a reduction in water consumption, in order to protect future water supply. ... It also means dealing with the effects of <u>temperature increases</u>, extreme weather and potential flood risk through appropriate <u>building and public realm</u> design and siting of development."</p> <p>Transport. It is suggested that the wording within paragraph (3) I) is amended as follows: "Reduce the need to travel by locating development in accessible locations and promoting a range of sustainable travel modes with priority given to <u>public transport</u>, cycling and walking."</p> <ul style="list-style-type: none"> Paragraph 4.5- It is suggested that high quality placemaking should also be a priority for sustainable development. This should be referred to in paragraph 4.7. Paragraph 4.8- It is suggested that a reference to understanding the district's history and heritage through the use of archaeological surveys

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			<p>Strategic Objective 14 The objective is not specific enough for older persons accommodation and the importance in addressing the demand for Extra Care Housing. It is expected that the standards for new older persons accommodation should be included as part of the reference e.g. HAPPI accreditation which should be standard for older persons accommodation.</p> <p>HCC would expect any new build homes to be compliant with building regs standard of M4(2); and M4(3) for older persons and specialist accommodation. It is also expected that the design and layout of these houses would align with HCC's strategic business case for Extra Care Housing and design guide standards where applicable.</p> <p>Strategic Objective 15 References should be included with regard to access to Green and Blue Infrastructure, green views and ecology to support leisure, recreation, physical fitness, mental health and wellbeing. It could also refer to the Hertfordshire Green and Blue Infrastructure Strategy which should help identify areas of GBI deficit which would enable them to be addressed through the district council's local plan. This could also form part of the Evidence Base. This section feels less detailed than the previous objectives. The emphasis on reducing health inequalities is important here. Improving access to opportunities and services should be prioritised for those living in more deprived areas. To strengthen this objective further, the district 19 council should commit to working collaboratively with Public Health colleagues and other local partner organisations</p> <p>Paragraph 3.5 and 3.6 HCC welcomes the inclusion of our previous comments on the 2017 issues & options consultation and would expect further comments we have made above to be incorporated into the future iterations of the plan.</p> <p>Minerals and Waste Planning. The county council supports the wording of this policy and its specific inclusion of seeking to reduce waste by promoting reuse and recycling to support sustainable development, as well as recognising waste facilities as necessary infrastructure to enable and/or support development.</p> <p>Transport. It is suggested that the wording within paragraph (3) I) is amended as follows: "Reduce the need to travel by locating development in accessible locations and promoting a range of sustainable travel modes with priority given to <u>public transport</u>, cycling and walking."</p> <p>Paragraph 4.5 It is suggested that high quality placemaking should also be a priority for sustainable development. This should be referred to in paragraph 4.7.</p> <p>Paragraph 4.8 It is suggested that a reference to understanding the district's history and heritage through the use of archaeological surveys should be included, where appropriate. This is not the same as a heritage asset, as it is not always visible until investigation or site preparation takes place.</p>	<p>addressing the demand for Extra Care Housing. HCC would expect any new build homes to be compliant with building regs standard of M4(2); and M4(3) for older persons and specialist accommodation. Design and layout of these houses would align with HCC's strategic business case for Extra Care Housing and design guide standards.</p> <ul style="list-style-type: none"> • SO15 References should be included with regard to access to Green and Blue Infrastructure, green views and ecology to support leisure, recreation, physical fitness, mental health and wellbeing. It could also refer to the Hertfordshire Green and Blue Infrastructure Strategy. This could also form part of the Evidence Base. Public Health. To strengthen this objective further, the district council should commit to working collaboratively with Public Health colleagues and other local partner organisations • Paragraph 3.5 and 3.6 HCC welcomes the inclusion of our previous comments on the 2017 issues & options consultation and would expect further comments we have made above to be incorporated into the future iterations of the plan. • Minerals and waste- support policy wording. • Transport- paragraph 3 I) is amended • Paragraph 4.5- It is suggested that high quality placemaking should also be a priority for sustainable development. This should be referred to in paragraph 4.7. • Paragraph 4.8- It is suggested that a reference to understanding the district's history and heritage through the use of archaeological surveys should be included, where appropriate. 		<p>should be included, where appropriate.</p>
SC_00027	TFL Commercial Development		<p>With regard to part 3 of this policy it is unclear if the expectation is that every major housing proposal of 100 dwelling or more would have to include specialist and supported housing. If this is the intention of the policy then Tfl CD would suggest that this may not be appropriate in every case, and so the policy should include the flexibility for schemes not to include specialist and supported housing where it can be justified.</p> <p>In part 6 there is reference to 'strategic sites', it would be useful to clarify what a strategic site is as a search of the document does not make this clear.</p>	<ul style="list-style-type: none"> • Unclear if expectation is that every major housing development of 100 dwelling or more would be appropriate in every case, policy should include the flexibility for schemes not to include specialist and supported housing where it can be justified. 	<p>Noted. Developments of 100 dwellings or more will be expected to provide a mix and type of housing to reflect local need as set out in the LHNA.</p>	<p>No action</p>

Q2. Should we have considered alternative options?						
SC_00023	Croxley Green Parish Council	Yes	<p>In general we do not think the preferred policy option goes far enough. It is reactive and unambitious. Alternative options could be considered, with an indication of what a more ambitious policy could achieve.</p>	<p>Alternative options could be considered, with an indication of what a more ambitious policy could achieve.</p>	<p>Noted</p>	<p>A further reiteration of the SA should include a high growth option.</p>

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HOUSING MIX & TYPE

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Q3. Do you think the Preferred Policy Option for Housing Mix and Type is the right approach?						
SC_P1_00008_Home Builders Federation	Home Builders Federation		The Council have not set out in this consultation document a specific policy option to support the delivery of housing development to meet the specific needs of older people. Paragraph 63-006 of PPG sets out that plans should set clear policies as to how the housing needs of older people will be supported. One key way that such support can be clearly established is through the identification of needs for older peoples' housing and a commitment to meet that need. The HBF recognise that there is not a requirement in national policy to set out the level of housing needs for older people in a policy. However, we consider it that in order for such a policy to be truly effective and therefore sound the need for such accommodation should be identified in the local plan in order to support decision makers. In particular it will help decision makers to assess whether there is a shortfall in supply to meet the needs of older people to ensure a more positive approach to decision making should shortfalls be identified. Such an approach would also ensure transparency and support effective monitoring and review of the Council's approach to older peoples housing.	<ul style="list-style-type: none"> Council doesn't set out a specific policy option to support delivery of housing development to meet specific needs for older people. In particular it will help decision makers to assess whether there is a shortfall in supply to meet the needs of older people to ensure a more positive approach to decision making should shortfalls be identified. 	Preferred Policy Option 2 Housing Mix and Type sets out the requirements for specialist housing, accessible and adaptable buildings and the supporting text refers to the LHNA which has considered the needs for older people. The comment relates to monitoring of older persons needs specifically for housing to identify shortfalls given the identified need for older persons housing.	No action
SC_0009_Sarratt Parish Council	Sarratt Parish Council	Support	We support this policy, but we request that additional clarification is added to cover the likely scenario where the housing mix for a local area, such as a village or a parish is different to that of Three Rivers District as a whole, and that targets can be suitably adjusted for those areas to achieve the desired needs for that community.	<ul style="list-style-type: none"> Supports policy Requests that where the housing mix for a local area such as a village or parish is different to that TRDC as a whole that targets be suitably adjusted for those areas to achieve the desired needs for that community 	Support noted Existing draft policy states the following: 2) In determining an appropriate housing mix, the Council will require proposals to take into account: a) The range of housing need in terms of the size and type of dwellings as identified by the Local Housing Needs Assessment (LHNA) and subsequent updates; b) Detailed local housing market assessments (where relevant); c) Current and future demographic profiles and population; d) The characteristics of the site which may influence its ability to accommodate a mix of housing, including its size, location and constraints and opportunities for development; e) Evidence of local market signals, trends and circumstances; The draft policy will allow for a different housing mix than set out in the most recent LHNA where a detailed local housing market assessment supports this.	No action
SC_00019_Watford Borough Council	Watford Borough Council	yes	It is unclear what the self-build requirement is on strategic sites. The focus on high quality development is supported. To help meet the shortfall of housing proposed, an approach to higher density development should be set out, particularly to support higher density development in the service centres where people have good access to services, facilities and public transport. This should be reflected in the site capacities set out in the site allocations.	<ul style="list-style-type: none"> It is unclear what the self-build requirement is on strategic sites. The focus on high quality development is supported. To help meet the shortfall of housing proposed, an approach to higher density development should be set out, particularly to support higher density development in the service centres where people have good access to services, facilities and public transport. This should be reflected in the site 	Noted.	To consider Self-build requirement on strategic sites

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				capacities set out in the site allocations.		
SC_00 023 Croxley Green Parish Council	Croxley Green Parish Council	No	Design of the buildings in their setting is particularly important and this should support the approach in the Neighbourhood Plan to protect the character of the various areas in Croxley Green. We draw attention to the comments in Jed Griffiths' statement and suggest the policy should be based on the most up to date data. We have concerns that the balance of housing may not adequately reflect the changing needs of the community following Brexit and the pandemic. Progress towards these targets should be monitored and the figures should be kept under constant review. Although we support the approach in general we consider any larger site (over 10 units) should be developed with a master plan approach.	<ul style="list-style-type: none"> The policy should be based on the most up to date data. Concerns that the balance of housing may not adequately reflect the changing needs of the community following Brexit and the pandemic. Progress towards these housing targets should be monitored and the figures should be kept under constant review. Although we support the approach in general we consider any larger site (over 10 units) should be developed within a master plan approach. 	<ul style="list-style-type: none"> Noted. Household and population projections will be updated to reflect latest projections. TRDC has a housing delivery Action Plan which monitors housing delivery. Sites over 50 dwellings are subject to masterplan process. 	Still unclear- we have used 2019 projections?
SC_00 024_A Langley Parish Council	Abbots Langley Parish Council		The mix of housing bears no strategy as to how this will be mixed on individual sites, it is important that all these house types are mixed together on all sites to create an integrated society. Also if elderly residents have access to quality smaller homes within the proposed mixed housing area, this would free up a large proportion of larger accommodation within the district and reduce the need for the larger houses. Sites for Self Build need to be better provided and more numerous across the allocated sites, this allows a form off first time affordable accommodation and also provides a more localised economy utilising local trades	<ul style="list-style-type: none"> Support for the different mix of housing on site but considers no strategy for how this will happen on site- I suspect they want a breakdown of each individual site by type and mix 	Noted. The SHMA provides an overview of the housing type and mix needed within TRDC. This is the starting point for negotiations with developers and site mix will be dependent on the type of accommodation provided.	No action
SC_00 026_H HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Adult Care Services.</p> <p>The provision of appropriate housing for both older people and people with disabilities is critical, which is underpinned by the National Planning Policy Framework (NPPF). The older population of Three Rivers (over 65s) is predicted to increase by 30.5% by 2040 (POPPI data, accessed July 2021). Of these it is estimated that 2,577 people aged between 65 and 74, and 4,895 people aged over 75 will be living alone. Projections also show an increase of 283 (44%) people living in a residential care home with or without nursing care during the same period. Research shows that social isolation and inappropriate housing are key determinants of poor health outcomes in all people, but especially for those who have disabilities or over 65. Extra care housing, specifically designed to improve health and social connection and built in areas that strengthen local communities and place shaping activities, can help alleviate stress on public services, allow local communities to remain intergenerational, and can help release under-occupied housing back into the general market helping to balance housing need across the district.</p> <p>The county council's Adult Care Service (ACS) has developed a local set of design standards to ensure there is a good, consistent extra care offer in the county. A minimum of 50 units, up to 130 units as a maximum for each scheme is considered optimum, with guidelines and features of minimum site and height sizes for each scheme included. The table below shows approximate dimensions as a guide, although each scheme should be assessed on a site by site basis. These ACS design principles have been shaped by national standards, good practice and excellent schemes in other areas. The Council does not own any of the existing extra care schemes in Hertfordshire, so collaboration and partnership working with our housing associations and districts will be required, and will include residents and the local community, in line with co-production principles.</p> <p>Hertfordshire's set of design standards aims to support the delivery of specialist housing options for older people. The guide has been developed for architects, developers and housing providers delivering homes including homes for private sale and a range of affordable housing tenures. By meeting the standards in the guide, new homes for older people in Hertfordshire are expected to achieve excellence in quality and desirability. Along with above site size guidance, it is essential that new extra care housing be close to good public transport links, be a short walk to local amenities, local shops and health care, have private outdoor space as well as shared private gardens, a communal lounge, plus a range of staff facilities. Ideally, they should also include a communal café/restaurant, activity and health and fitness space. HCC welcomes the opportunity to work with stakeholders at the early stages of design.</p> <p>Preferred Policy Option 2, Housing Mix and Type Paragraphs 4) and 5) It is suggested that TRDC should clearly define which type of specialist and supported accommodation are supported as part of this policies. It is recommended that the National Expectations for Supported Housing (MHCLG, 2020) should be referred to either in the policy or in the supporting text to provide further guidance. HCC also recommend that building regulation part M4(2) should be complied in relevant development with a proportion meeting M4(3) standard.</p> <p>New specialised and supported accommodation should be, wherever possible, made available in all tenure types. Where possible, rent level of those accommodation should be affordable or at least set at current market rate. The district council should liaise with relevant HCC teams at an early stage of any development proposals that involves specialist accommodation.</p>	<ul style="list-style-type: none"> Preferred Policy Option 2 It is suggested that TRDC should clearly define which type of specialist and supported accommodation are supported as part of this policies. It is recommended that the National Expectations for Supported Housing (MHCLG, 2020) should be referred to either in the policy or in the supporting text to provide further guidance. HCC also recommend that building regulation part M4(2) should be complied in relevant development with a proportion meeting M4(3) standard. The district council should liaise with relevant HCC teams at an early stage of any development proposals that involves specialist accommodation. 	Noted. The need for extra care housing within TRD and the County Council design standards for allocations of 50 units and more.	Revisit specialist housing policy and make reference to 50 dwellings or more to adhere to HCC design guidance.
SC_00 027_T FL Comm	TFL Commercial Development		With regard to part 3 of this policy it is unclear if the expectation is that every major housing proposal of 100 dwelling or more would have to include specialist and supported housing. If this is the intention of the policy then TFL CD would suggest that this may not be appropriate in every case, and so the policy should include the flexibility for schemes not to include specialist and supported	<ul style="list-style-type: none"> Unclear if expectation is that every major housing development of 100 dwelling or more would be appropriate in every case, policy should include the 	Noted. Developments of 100 dwellings or more are required to provide a mix and type of housing. Specialist housing will be sought in areas of need.	Definition of strategic site to be included for clarification

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REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
ercial Development			housing where it can be justified. In part 6 there is reference to 'strategic sites', it would be useful to clarify what a strategic site is as a search of the document does not make this clear.	flexibility for schemes not to include specialist and supported housing where it can be justified.		

Q3. Should we have considered alternative options?						
SC_00027_TFL Commercial Development	TFL Commercial Development		TfL support the Council's aspiration for seeking to optimise density on sites. This is vital to make the most efficient use of land in line with the NPPF. Paragraph 11 of the NPPF notes that all plans should promote a sustainable pattern of development that seeks to mitigate climate change (including by making effective use of land in urban areas) and Chapter 11 of the NPPF also goes into detail on making effective use of land. This will help minimise the need to develop on Green Belt sites. The expectation for sites in areas well served by public transport, services and facilities to have higher densities is also supported.	<ul style="list-style-type: none"> Support the Policy. 	Noted	No action

HOUSING DENSITY

Q4. Do you think the Preferred Policy Option for Housing Density is the right approach?						
SC_00012_Dacorum Borough Council	Dacorum Borough Council	Yes	We support the approach set out in the policy in terms of balancing out the quality and character of an area with encouraging effective use of urban land and uplifting densities. This is especially important in terms of meeting your housing needs while minimising pressure on greenfield and/or Green Belt sites.	<ul style="list-style-type: none"> Support the approach 	Noted	None
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	No	<p>Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links and access to nearby services.</p> <p>It should also be about provision of appropriate outdoor space for each dwelling to enable people to have access to such space – as proved vital during pandemic lockdowns.</p> <p>Also to ensure appropriate provision for as much biodiversity and planting as possible, to help with carbon capture. Residents should also be incentivised to grow more of their own food, to help with sustainability and in some cases with their cost of living.</p> <p>Specific density targets should be set with no exceptions. Particularly without any transparent and measurable basis for which a higher density might be accepted. The pandemic has caused a significant shift in the amount of time people are spending / working from home and there is evidence that this will continue to be the case in future with businesses looking to reduce expensive office accommodation footprint. Lower density should be considered over historic statistics, given this shift.</p> <p>The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas of Croxley Green (and elsewhere in Three Rivers). Housing density should reflect the density of the existing settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area. We question whether the minimum amenity space standards in Appendix 1 – Design Guide can be achieved with the proposed target of 50 dwellings per hectare.</p>	<ul style="list-style-type: none"> Housing density should reflect the density of the existing settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area. We question whether the minimum amenity space standards in Appendix 1 – Design Guide can be achieved with the proposed target of 50 dwellings per hectare. 	Noted. The forthcoming SHELAA will provide greater detail on site capacity, type of tenure, taking account of the surrounding built form.	Consider identifying those locations with potential for taller buildings.

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SC_00 024_A bbots Langle y Parish Council	Abbots Langley Parish Council	Yes	We support the density, but would like to see a commitment, that the types of houses are of a dense nature (terraces, semi detached etc), in order that more of the site can be established to provide shared community space and green space for biodiversity and wellbeing.	<ul style="list-style-type: none"> Unclear. Terraced housing are high density but semi detached homes tend to be of a lower density? 	Noted. The forthcoming SHELAA will provide greater detail on site capacity, type of tenure, taking account of the surrounding built form.	No action
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Q4. Should we have considered alternative options?						

AFFORDABLE HOUSING

Q5. Do you think the Preferred Policy Option for Affordable Housing is the right approach?						
SC_P1 _0000 8_Hom e Builder s Federa tion	Home Builders Federation		<p>We have a number of comments to make on the preferred policy option relating to:</p> <ul style="list-style-type: none"> The requirement for all development to provide an affordable housing contribution; First Homes; and Viability. <p>All developments required to provide affordable housing contribution.</p> <p>The Council are aware that the preferred approach is inconsistent with paragraph 63 of the NPPF, yet it considers it necessary to require contributions from sites not defined as major development. The Council consider this necessary due to the acute shortage of affordable homes and the crucial role that such sites have played historically in delivering housing in the district. Firstly, we would agree with the Council that historically affordable housing delivering in the district has been poor averaging just 54 homes per annum over the last 20 years. However, rather than seek to deliver more affordable housing from sites below the minimum threshold placed by Government with regard to affordable housing contributions we would suggest a more effective approach would be to allocate additional sites in order meet its housing needs in full. Such an approach is supported by PPG which states at paragraph 2a-024 that: "An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes". It is also worth reiterating why the Government introduced this particular policy. The Ministerial Statement from 2013 was clear that the reason for introducing this policy was to "ease the disproportionate burden of developer contributions on small scale developers". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by about 70% since 1988. The Government is very anxious to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is the key to long-term supply responsiveness. In addition, the Government's broader aims for the housing market are not just to support existing SME house builders but to grow this sector again which was hit hard by the recession with the number of registered small builders falling from 44,000 in 2007 to 18,000 in 2015. To grow the sector one key element has been to simplify the planning system in order to reduce the burden to new entrants into this market. Therefore, the focus of the Council should be on freeing up this sector of the house building industry rather than seeking to place financial burdens that the Government have said should not be implemented.</p> <p>15. As such we do not consider there to be any justification at present for the Council to depart from national policy and require all development to deliver affordable housing. As such the Council should amend the policy accordingly.</p> <p>First Homes</p> <p>The Council will need to take account of the Government's policy with regard to First Homes as set out in the Written Ministerial Statement published on 24 May 2021 and paragraphs 70-001 to 70-029 of Planning Practice Guidance. Whilst we do not seek to make any comments at this stage with regard to the approach the Council should take in policy it is important that the approach taken to the Viability evidence reflects the fact that whilst First Homes are an affordable housing product they are marketed and sold by the developer. As such the costs and risks related to the sale of such housing when considered in any viability assessment should reflect those for market housing and not affordable housing. In particular the return on such homes should be set at those for market housing and not the 6% return usually expected for affordable housing.</p> <p>Viability</p> <p>17. The viability assessment is still to be published and without this evidence it is not possible to comment on whether the Council's policy requirements, such as those for affordable housing, are viable and the plan as whole is deliverable. However, we would like to make some broad comments on viability in relation to the approach establishing the 2019 NPPF and its supporting guidance.</p>	<p>Affordable Housing</p> <ul style="list-style-type: none"> Requirement for all new developments to provide affordable homes inconsistent with paragraph 63 of NPPF (developer contributions shouldn't be sought from sites not defined as major development) Propose Council should allocate additional sites to meet past under delivery in affordable housing as supported by PPG paragraph 2a-024 that states 'An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes' <p>First Homes</p> <ul style="list-style-type: none"> Council need to take account of First Homes introduced by Ministerial Statement and PPG – no comment on policy but suggest viability evidence reflects that whilst First Homes are an affordable housing product they are marketed and sold by the developer. Costs and risks related to the sale when considered in any viability assessment should reflect those for market housing and not affordable housing – return on such homes should be set at those for market housing and not the 6% return usually expected for affordable housing. <p>Viability Assessment</p> <ul style="list-style-type: none"> Unable to comment as Council hasn't published viability assessment. Refers to NPPF paragraph 57 Refers to the use of the briefing note prepared by HBF which sets out some common concerns with viability testing of local plans under latest guidance and how these should be addressed Sets out 4 particular issues with whole plan viability assessments as: <ol style="list-style-type: none"> Approach to abnormal infrastructure costs – para 57 NPPF requires that these are factored in to the viability assessment – whilst recognising that abnormal costs are expected to come off land view – where costs are high will result in sites not 	<ul style="list-style-type: none"> Noted, however local circumstances and LHNA suggests that the need for affordable housing is so acute that a different approach is proposed to that in the NPPF. The Council has had this policy in place since 2011 (with the exception of a few months) and should bow be reflected in land values for all developers particularly SMEs. Evidence suggests that this policy hasn't prevented minor developments being delivered. Noted. 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. <p>First Homes</p> <ul style="list-style-type: none"> Agreed. First Homes came into effect after the consultation document finalised. Affordable Housing Policy will be amended to reflect the changes in national planning policy. <p>Viability Assessment</p> <ul style="list-style-type: none"> A viability Assessment will be published alongside Regulation 19 Local Plan. 	Where an alternative approach to the standard method is used, past under delivery should be taken into account. With regard to affordable housing contributions a more effective approach would be to allocate additional sites in order to meet housing needs in full. This approach is supported by PPG which states at paragraph 2a-024.

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		<p>18. The 2019 National Planning Policy Framework (NPPF) requires development viability to be resolved through the local plan and not at the planning application stage. The aim of this approach is to ensure that, as outlined in paragraph 57 of the NPPF, decision makers can assume that development which is in conformity with the local plan is viable and to, ultimately, reduce the amount of site-by-site negotiation that takes place. As such it will be important that the Council's approach to its viability assessment and the costs it places on development are cautious to take account of the variability in delivering the range of sites that will come forward through the local plan. To support local planning authorities in preparing their viability evidence the HBF has prepared a briefing note, attached to this response, which sets out some common concerns with viability testing of local plans under the latest guidance and how these should be addressed. Whilst this note focuses on all aspects of the viability testing of the residential development and should be taken into account, we would like to highlight four particular issues with whole plan viability assessments.</p> <p>19. The first issue is with regard to the approach taken to abnormal infrastructure costs. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019 NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, this option is now significantly restricted by paragraph 57 of the 2019 NPPF. As such these abnormal costs must be factored into whole plan viability assessments. We recognise that the very nature of an abnormal costs is difficult to quantify, but it is a fact that they are often substantial and can have a significant impact on viability. Where and how these costs arise is also variable. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. It is also the case that abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable.</p> <p>20. Whilst we recognise that abnormal costs are expected to come off the land value, we are concerned that if abnormal costs are high then it will result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. It is therefore important that a significant buffer is included within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the plan will come forward without negotiation.</p> <p>21. Secondly, we would encourage the Council to use the upper end of any of the ranges suggested with regards to fees and profit margins. Again, these will vary from developer to developer but given that the Government want to minimise negotiation on planning obligations it would make sense to use the highest point of any range. The changing landscape with regard to viability assessment could lead to development slowing significantly if the correct variables are not taken into account.</p> <p>22. Thirdly, the council must ensure that all the policy costs associated with the local plan are included within the viability assessment. Whilst affordable housing and infrastructure contributions for the majority of the additional costs that are placed on developers by the Council it is important that the cumulative impact of all policies are tested. With regard to the local plan review the Council will need to consider the impact of its proposed policies on bio-diversity net gains, electric vehicle charging, sustainable design and construction; and renewable energy. The viability assessment will also need consider the impact of future national policies on viability and whether there is sufficient headroom to ensure these standards can be addressed alongside the policies in the local plan.</p> <p>23. Finally, the approach to land values needs to be a balanced approach and one that recognises that there will be a point at which land will just not come forward if values are too low to take account of policy and infrastructure costs. There are a variety of reasons why a landowner is looking to sell their land and it cannot be assumed that they will absorb significant reductions in land values to meet policy costs. Land is a long-term investment and the returns being offered must take account of this.</p>	<p>being developed as land value will be insufficient to incentivise landowner to sell – important that viability assessment includes a significant buffer if the Council are to state with certainty that these sites will come forward without negotiation.</p> <ol style="list-style-type: none"> 2) Upper end of any of the ranges suggested with regards to fees and profit margins 3) Council must ensure that policy costs are included in the viability assessment – cumulative effect of any policies are tested (bio diversity net gains, electric vehicle charging points, sustainable design and construction, renewable energy etc) 4) Approach to land values needs to be balanced and one that recognises that there is a point at which land will not come forward if land values are too low due to infrastructure and policy costs. 		
SC_00012_Dacorum Borough Council	Dacorum Borough Council	We support the approach set out in the policy in terms of securing a sufficient supply and appropriate mix of genuinely affordable housing. However, the approach needs updating to reflect the recent introduction of First Homes.	<ul style="list-style-type: none"> • Support the policy but needs to be updated to reflect the recent introduction of First Homes 	Noted. Agreed. First Homes came into effect after the consultation document finalised. Affordable Housing Policy will be amended to reflect the changes in national planning policy.	Change the policy in relation to Part 1
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	<p>The definition of “affordable” housing is somewhat meaningless in a high-cost area such as Three Rivers and there should be a more detailed statement of the need for social housing and starter homes.</p> <p>With regards to the mode and delivery of affordable housing, there should be clear guidance on the size thresholds applicable to each type of site. Viability considerations should also be covered in the policy – the requirements should be based on an “open book” approach, with full publication of calculations of affordable housing on individual sites</p> <p>Croxley Green Parish Council believes as much as possible social renting is needed to provide housing especially for young families who are from the area and want to live here. We would like to see the policy include how the provision of affordable rent dwellings will be measured and how rental affordability of these dwellings be continued once they have been built. By applying the same proportion for all developments from 1 additional home upwards, small developers are penalised and will go elsewhere. Contribution to affordable housing is essential but the contribution should be progressive, i.e. the contribution by larger developers should be larger. There should be a threshold</p>	<ul style="list-style-type: none"> • Require a detailed statement of the need for social housing and starter homes. • With regards to the mode and delivery of affordable housing, there should be clear guidance on the size thresholds applicable to each type of site. • Viability considerations should also be covered in the policy • Better provision for wheelchair users, to reflect the increasing needs of an ageing population. At least 25% of affordable housing meeting the Building Regulations M4(3) standard. 	<ul style="list-style-type: none"> • Noted. • The affordable housing policy sets out the threshold for affordable housing. • A viability Assessment will be published alongside Regulation 19 Local Plan. • The LHNA sets out the type and mix of housing reflecting local needs. Setting a blanket policy of 25% wheelchair housing across all sites will not deliver wider housing needs within the area. 	No action

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			for small developments to encourage development of smaller in-fill sites that can contribute to the overall numbers of new homes. We believe there should be better provision for wheelchair users, to reflect the increasing needs of an ageing population. At least 25% of affordable housing meeting the Building Regulations M4(3) standard.			
SC_00 024_A Abbots Langley Parish Council	Abbots Langley Parish Council		Disagree, the document states that 60% is required, if we set the bar at 40% then it is not addressing the needs of the community and it will require migration to lower cost areas?	<ul style="list-style-type: none"> Object that the affordable requirement is only 40% and not 60% as stated in the LHNA. 	<ul style="list-style-type: none"> Noted. Despite the acute housing need within TRD developments need to pass the viability test otherwise many sites will be reduced to being undeliverable. 	No action
SC_00 027_T FL Comm ercial Develo pment	TFL Commercial Development		The South West Hertfordshire Local Housing Needs Assessment August 2020 notes on pg. 112 that <i>“such is the scale of affordable housing need that the local authorities should seek to deliver as much affordable housing to rent as viability allows”</i> . However, it does not appear from looking at the Council’s evidence base that a viability study has been undertaken. The requirement for 50% affordable housing (40% affordable rent and 10% affordable home ownership) is a high bar and this must be supported by viability evidence to demonstrate that this requirement would not significantly reduce the amount of development coming forward. There is also no mention of First Homes, it would be useful for the Council to clarify their approach on this.	<ul style="list-style-type: none"> Viability assessment not been undertaken. 50% affordable housing a high bar and must be supported by viability evidence to demonstrate that this requirement would not significantly reduce amount of development coming forward; No mention of First Homes 	<ul style="list-style-type: none"> A viability assessment will be undertaken as part of a Regulation 19 local plan. The 50% affordable housing target reflects housing need in TRDC. Agreed. First Homes came into effect after the consultation document finalised. Affordable Housing Policy will be amended to reflect the changes in national planning policy. 	
SC_00 029_H Hertsme re Boroug h Council	Hertsme re Boroug h Council		There is no reference to the government requirement for a percentage of affordable homes to be First Homes. First Homes are now the government’s preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.	<ul style="list-style-type: none"> No reference to First Homes that should account for 25% of all affordable housing 	<ul style="list-style-type: none"> Agreed. First Homes came into effect after the consultation document finalised. Affordable Housing Policy will be amended to reflect the changes in national planning policy. 	Draft policy to include First Homes requirement

Q5. Should we have considered alternative options?

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PROVISION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Q6 Do you think the Preferred Policy Option for Gypsies, Travellers and Travelling Showpeople is the right approach?

SC_00 022_E nviron ment Agenc y	Environment Agency		We are pleased to see that provisions have been made for such development to avoid areas at risk of flooding. Caravans, mobile homes and park homes intended for permanent residential have a flood risk vulnerability classification of ‘highly vulnerable’ (in accordance with Table 2 of the National Planning Practice Guidance, Flood Risk and Coastal Change). Table 3 shows this type of development is not compatible with flood zones 3b or 3a, and require the exception test to be passed to be compatible with flood zone 2. We believe this policy requires the following changes to ensure Three Rivers takes the right approach in ensuring sustainable development. Part 1 (a) of this policy could be clarified by including reference to ‘all sources of flooding’, so that it is clear that sources of flooding other than fluvial flooding are included (e.g. surface water and groundwater flooding). Furthermore, it should be ensured that development, including caravans, mobile homes and park homes are located at least 8 metres from a main river. This is to ensure access for maintenance purposes, ensure flood risk is not increased elsewhere (paragraph 160, NPPF) and to allow to coherent green space and the protection of biodiversity (paragraph 170, NPPF). We note that a buffer zone policy has been included in Preferred Policy Option 15 (Point J), so we recommend either referring to Policy Option 15, or including the requirement for an 8 metre buffer zone as a separate point within Policy Option 5.	<ul style="list-style-type: none"> Supports that provision has been made for such development to avoid areas at risk of flooding – caravans, mobile homes and park homes are classified ‘highly vulnerable’ Suggests following changes to policy Part 1 (a) could be clarified by including reference to ‘all sources of flooding’ so it’s clear not just fluvial Ensure that development including caravans, mobile homes and park homes are located at least 8m from a main river. We note that Policy Option 15 includes this requirement so recommend either referring to policy 15 or including the requirement again in this policy as a separate bullet point 	<ul style="list-style-type: none"> Noted. Agreed. Amendments to policy. Policy 15 includes the requirement for all development to maintain a minimum distance of 8m from a main river. This will apply to all development. 	Amendment to Policy Option 5 Provision for Gypsies, Travellers and Travelling Showpeople (1) a) Avoid areas at risk from all sources of flooding;
SC_00 027_T FL Comm	TFL Commercial Development		Appendix 1 notes that development which relies on outlook over railway lines will be discouraged. The paragraph goes on to note that there should be an outlook over a public or private highway, but it is not understood why this is considered to be any more acceptable from an outlook perspective than a railway. TfL CD have a number of sites next to railway lines within the borough that are suitable for development, and as one of the largest landowners in London and the surrounding areas	<ul style="list-style-type: none"> Appendix 1 – Unclear why the outlook over a public or private highway is worse than a railway line; Are mitigation measures available, such as a 3m buffer for access to the 	<ul style="list-style-type: none"> Noted. The vibration from trains is considered to have a greater detrimental impact than road users. However, given that additional guidance has been provided in regards to Buffer Zones, this will be reviewed ahead of the next stage of the Local Plan. 	Review Appendix 1 in light of comments by TFL

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ercial Development			<p>we are well versed in delivering residential-led development adjacent to railway infrastructure utilising suitable mitigation to minimise the impacts of the railway on new development. For example, where there is development proposed next to a railway there must be a 3 meter buffer provided between the development and the railway in order to facilitate operational access to the railway, access to the outside of the development for maintenance and to stop items that may fall out of development windows from falling directly onto the railway. This 3-meter buffer must allow vehicle access, but it can be incorporated into the landscaping aspect of a new development thus helping to providing a positive outlook.</p> <p>Given the above, we would request that the reference to outlooks over railway line being discouraged be removed.</p>	<p>railway and vehicle access; however this 3m can incorporate the landscaping aspect of a new development;</p> <ul style="list-style-type: none"> Therefore request that the reference to outlooks over the railway line be removed. 		
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Q6. Should we have considered alternative options?

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RESIDENTIAL DESIGN AND LAYOUT AD ACCESSIBLE AND ADAPTABLE BUILDINGS

Q7. Do you think the Preferred Policy Option for Residential Design and Layout and Accessible and Adaptable Buildings is the right approach?

SC_P1_00008_Home Builders Federation	Home Builders Federation	<p>We could not find any evidence to support the adoption of the National Described Space Standards. It is important to recognise that the optional technical standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. The application of space standards has been considered in the viability assessment, however no we could not find any evidence as to the need for such standards that has been published by the Council.</p> <p>25. Whilst the HBF share the Council desires to see good quality homes delivered within Three Rivers we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms. Given the poor affordability of property in the area it is important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy.</p> <p>26. The HBF is also not aware of any evidence that market dwellings in the district that do not meet the NDSS remaining unsold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in</p>	<ul style="list-style-type: none"> No evidence to support adoption of National Space Standards (Paragraph 56-0002 of PPG states should only be introduced where needed) Space standards can have a negative impact upon affordability issues and reduce customer choice (eg some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms) No evidence of market dwellings in the District that do not meet NDSS remaining unsold or that those living in them consider their housing needs not met/that size of houses being built are considered inappropriate by purchasers/or that houses not built to NDSS are selling less well in comparison Requests the removal of the policy Requirement that 10% of all homes on development should be built to part M4(3) must be based on evidence. LHNA says need for 430 but not clear how many homes policy will deliver Distinction between wheelchair accessible housing and wheelchair adaptable housing needs to be made clear. PPG 56-0009 of PPG wheelchair accessible homes can only be applied to those properties local authority is responsible for allocating or nominating Self-build homes welcomes the clause allowing unsold plots to revert back to developer to be built as market housing but request that the 18 months is too long and should be reduced to 12 months 	<ul style="list-style-type: none"> The NPPF sets out that Local Plans may make use of these NDSS where the need for an internal space standard can be justified. Monitoring information shows that 193 dwellings (25%) permitted in Three Rivers between April 2015 and March 2019 were smaller than the NDSS. This is a significant proportion and suggests that there is a clear need to apply the NDSS to new housing development in Three Rivers. As such, requiring new development to generally accord with NDSS would provide for improvement to the quality of housing being delivered and resulting benefits for the general health and wellbeing of the community and a more flexible and adaptable housing stock better able to meet the needs of residents. Preferred Policy Option 6 Residential Design and Layout and Accessible and Adaptable Buildings sets out On developments of 50 or more dwellings: <ol style="list-style-type: none"> 10% of new homes should meet Building Regulations M4(2) standard (accessible and adaptable dwellings) and 10% of the affordable housing should meet Building Regulations M4(3) standard (wheelchair user dwellings) or subsequent standards in legislation to make homes accessible and adaptable. 18 months considered a reasonable timescale. 	Do we have evidence for the 18 months period?
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			<p>partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The latest survey published in 2021 demonstrates that 92% of new home buyers would purchase a new build home again and 91% would recommend their housebuilder to a friend. The results also conclude that 94% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.</p> <p>27. Given that there is little to suggest that development below space standards is an endemic concern within the district we would suggest that the requirement to meet NDSS is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.</p> <p>28. Similarly, the requirement that 10% of all homes on developments should be built to part M4(3) must also be based on evidence. The SW Herts LHNA estimates there is a need for 430 wheelchair user homes by 2036, however, that is not clear is how many homes this policy will deliver. This must be clearly set out by the Council in order for the proposed policy to be justified. In addition, the Council must make the distinction in the policy between wheelchair accessible housing and wheelchair adaptable housing. These are distinct categories with paragraph 56-009 of PPG stating that local Plan policies for wheelchair accessible homes should be applied “only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling”.</p> <p>29. With regard to self-build homes the HBF welcomes the clause allowing unsold plots to revert back to the developer to be built as market housing. However, given that the Council is required to have a register of those wishing to purchase a plot for self-build we would suggest that 18 months is too long and should be reduced to 12 months.</p>			
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		<p>We consider the minimum standards for amenity space will lead to very cramped designs and are the absolute minimum that should be permitted. In particular we stress the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7).</p> <p>Draw attention to explaining what “character” covers and referring to more recent national guidance. We have a number of detailed comments on the Design Criteria in Appendix 1 to this consultation.</p>	<ul style="list-style-type: none"> Stress the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7). 	Noted	No action
SC_00 024_A bbots Langley Parish Council	Abbots Langley Parish Council	Yes	Support	Support	Noted	No action
SC_00 026_H CC Growth and	HCC Growth and Infrastructure		LEADS. It is considered that this policy should be altered to make sure it is aligned with the National Design Guide and that it follows the principles in design coding and masterplanning. It is strongly recommended that this policy is revisited with reference to the NPPF and National	<ul style="list-style-type: none"> It is considered that this policy should be altered to make sure it is aligned with the National Design Guide and that it follows the principles in design coding and masterplanning 	Noted.	Check national design guide.

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Infrast ructure			Design Guide. It should be noted that North Herts District Council has recently had a masterplanning policy approved at the recent Local Plan Examination in Public (Policy SP9)1 and the district council may therefore want to use this as an approach to a similar policy in this local plan.			
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Q7. Should we have considered alternative options?						
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		We consider that a higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards.	Noted.	Agreed. Amend policy to allow for 100% new builds to meet the Building regulation M4 (2) accessible and adaptable homes standard. Wheelchair housing will be provided in accordance with need as set out in the LHN Study.	Amend policy this has the benefit of ensuring more homes can be adapted to meet the lifetime needs of communities.
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EMPLOYMENT AND ECONOMIC DEVELOPMENT

Q8. Do you think the Preferred Policy Option for Employment and Economic Development is the right approach?						
SC_00 012_D acoru m Boroug h Council	Dacorum Borough Council		We would suggest that TRDC treat the South West Herts Economic Study (2019) with a degree of caution, particularly in translating office/industrial/warehouse floorspace figures into policy aims (paragraphs 5.8-5.9 in the Plan). We consider that it is important to take into account the wide-ranging implications of the COVID-19 pandemic and relaxation of national planning controls over commercial uses, on floorspace change across the SWH area as a whole.	• Need to treat the South West Herts Economic Study with caution due to COVID and relaxation of planning controls across SWH as a whole	Noted. The implications of COVID and the Class MA Permitted Development changes will be taken into consideration in later stages of the plan making process.	No action
SC_00 019_W atford Boroug h Council	Watford Borough Council	yes	Support the provision and protection of industrial, storage and distribution uses as there is a shortfall of this type of employment land to meet development needs in Watford during the proposed plan period	• support	Noted.	No action
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council has concerns that the pressure to redevelop “brownfield” sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services. Otherwise, In general, we support the approach.	• Support approach.	Noted.	No action
SC_00 024_A bbots Langle y Parish Council	Abbots Langley Parish Council		1.8 suggests a need for office space and confirms that all the future needs will be met with Croxley Park? That suggests vehicle based commuting? Surely we should be looking at creating community based work ‘hubs’ to accommodate localised work from village centres near to amenities to bolster the local high street? In the last two years we have seen a ‘shift’ from the traditional office based work. Potentially smaller satellite office accommodation could free up some of the large office sites for housing.	• Shift from traditional office based work and want to consider creation of community based hubs.	NPPF makes clear town centres are the key designations for new offices and/or designated employment areas. A new employment land study could identify the type of new employment we need i.e., affordable workspace.	New employment study
SC_00 025_St . Albans City and District Council	St. Albans City and District Council		As stated at previous Duty to Cooperate meetings and on 12 July 2021, SADC may be in a position to support South West Herts Authorities in meeting the potential collective shortfall in employment land based on the current South West Herts Economic Study Update (2019). However, SADC’s Local Plan is at an early stage and no decisions have yet been made.	• SADC maybe in a position to support South West Herts Authorities in meeting the collective shortfall in employment land based on the current South West Herts Economic Study Update (2019).	Noted.	Continue ongoing DTC discussions.
SC_00 026_H CC Growth and Infrast ructure	HCC Growth and Infrastructure		Minerals and Waste Planning. The safeguarding of employment uses for business, industrial and storage or distribution uses is welcomed, along with the delivery of additional employment space. This is important from the Waste Planning Authority’s perspective as the adopted Waste Site Allocations DPD designates Employment Land Areas of Search (ELAS) within the district, where the location of waste management uses are considered acceptable in principle. The county council would not therefore wish to see the loss of such land within the district. It is considered that paragraph 5 could be strengthened through the consideration of the ‘Agent of Change’ principle (NPPF, paragraph 182) which states that planning decisions on new developments should ensure integration with existing business such that they do not have unreasonable restrictions placed upon them.	• Support. It is considered that paragraph 5 could be strengthened through the consideration of the ‘Agent of Change’ principle (NPPF, paragraph 182)	Agreed.	Reference to the Agent of change principle to be incorporated within supporting test.

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Q8. Should we have considered alternative options?						
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		There should be a policy to encourage and support businesses carrying out maintenance, repair and refurbishment locally, to support the circular economy.	<ul style="list-style-type: none"> A new policy to encourage and support businesses carrying out maintenance, repair and refurbishment locally, to support the circular economy 	Noted.	No action

WARNER BROS STUDIOS AT LEAVESDEN

Q9. Do you think the Preferred Policy Option for Warner Bros Studios at Leavesden is the right approach?						
SC_00 019_W atford Borough Council	Watford Borough Council	yes	Support the policy to encourage investment in the Warner Bros Studios. It is noted that development of the site is supported with a site allocation (COSPF6) north of the A41. Watford is seeking to improve cycle connectivity between the studios and the Watford town centre and would like future development in the area to help support the delivery of future infrastructure and be taken into account when future schemes are designed e.g. site access, safety, cycle parking etc).	<ul style="list-style-type: none"> support 	No action	
SC_00 024_A bbots Langley Parish Council	Abbots Langley Parish Council	Yes	Agree	<ul style="list-style-type: none"> support 	No action	

Q9. Should we have considered alternative options?						
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RETAIL AND LEISURE

Q10. Do you think the Preferred Policy Option for Retail and Leisure is the right approach?						
SC_00 019_W atford Borough Council	Watford Borough Council	yes	The town centre first approach is supported to retail provision as it most effectively contributes towards sustainable development.	Noted	Noted	No action
SC_00 024_A bbots Langley Parish Council	Abbots Langley Parish Council		I would welcome a requirements list within this document stating what the 'for instance' aims of Abbots Langley needs to be, ie how does it serve its community, can a person satisfy their weekly need within that centre, do they have choices. In order to address the Sustainable lifestyle, we need to set a standard for each centre so we can assess its failings and address them. Simply identifying an area does not do this.	Want a set standard for each centre to assess its failings and address them. Simply identifying an area does not do this.	Noted.	Do we have a policy on local centre hierarchy? It may help identify those villages that can accommodate more employment/ housing than others.

Q10. Should we have considered alternative options?						
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SOCIAL AND COMMUNITY FACILITIES

Q11. Do you think the Preferred Policy Option for Social and community facilities is the right approach?						
SC_P1 _0000 7_Spor	Sport England	No	The preferred policy option is broadly supported as it supports the principle of new community facilities (including sports facilities such as leisure centres) and seeks to protect existing facilities.	<ul style="list-style-type: none"> Preferred policy option broadly supported 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> Additional wording can be added to Part 6 of the policy:

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t Englan d			<p>The policy option would be considered to broadly accord with Government policy in paragraph 97 of the NPPF in relation to sports facilities.</p> <p>Notwithstanding the general support for policy option 1, it is requested that the following amendments are made: Part 6 of the policy should add a criterion along the lines of 'where a strategic or local need for the facility can be identified for the new/improved social or community facility.' This would help the Council assess proposals in sensitive locations such as the Green Belt where the benefits of a facility to the community have to be considered against planning constraints and would also help avoid it being interpreted that the Council would support 'speculative' schemes for social/community facilities for which there is not an identified need. This approach would be consistent with paragraph 96 of the NPPF which focuses around planning for facilities for which a need has been identified. The reasoned justification to the policy should refer to the Council's Open Space, Sport and Recreation Study (2019) as this provides the Council's evidence base for informing whether a proposal accords with the policy in relation to sports facilities.</p>	<ul style="list-style-type: none"> Notwithstanding the general support for policy option 1, it is requested that the following amendments are made: Part 6 of the policy should add a criterion along the lines of 'where a strategic or local need for the facility can be identified for the new/improved social or community facility.' This would help the Council assess proposals in sensitive locations such as the Green Belt where the benefits of a facility to the community have to be considered against planning constraints and would also help avoid it being interpreted that the Council would support 'speculative' schemes The reasoned justification to the policy should refer to the Council's Open Space, Sport and Recreation Study (2019) as this provides the Council's evidence base for informing whether a proposal accords with the policy in relation to sports facilities. 	<ul style="list-style-type: none"> Additional wording can be added to Part 6 of the policy: d) Where a strategic or local need for the facility can be identified for the new/improved social or community facility.' Additional wording to be added to reasoned justification section at 6.3 The Open Space Sport & Recreation Study provides information relating to the provision of sports facilities and some community facilities. 	<p>(6) Proposals for new or improved social or community facilities, including extensions to existing facilities will be supported where they are in accordance with relevant objectives and other policies of the Local Plan and:</p> <p>a) Are located in areas convenient for the community they would serve and be accessible by a range of sustainable modes of transport including walking, cycling and public transport;</p> <p>b) Provide spaces and buildings which are inclusive, accessible, flexible and sustainable and which meet the needs of intended users; and</p> <p>c) Are designed and sited to maximise shared use of the facility.</p> <p>d) Where a strategic or local need for the facility can be identified for the new/improved social or community facility.'</p> <ul style="list-style-type: none"> Additional wording to be added to reasoned justification section at 6.3 It is vital that all residents have good access to community, leisure and cultural facilities and it is recognised that the loss of these facilities can have a detrimental impact upon an individual's quality of life. Social and community facilities, whether publicly or privately owned, can be subject to development pressures from alternative uses. It is therefore important that where appropriate such facilities are retained within the local community. The Open Space Sport & Recreation Study provides information relating to the provision of sports facilities and some community facilities.
SC_00 018_N HS Herts Valleys CCG	NHS Herts Valleys CCG	Social and Commu nity Facilitie s	<p>Preferred Policy Option 10 – Social and Community Facilities</p> <p>Policy 10 – Social and Community Facilities of the Preferred Policy Local Plan manages the loss or change of use of existing 'community facilities.'</p> <p>At present the policy reads: "Protection of Existing Facilities (1) Proposals for the redevelopment or change of use of any premises resulting in the loss of social or community facilities, or services that support the local community, will not be permitted unless: a) A replacement facility is provided on-site, offering a level of accessibility and standard of provision at least equal to that of the existing facility which would continue to meet the need of the local population; or b) The facility or service concerned will be adequately supplied or met by an easily accessible existing or new facility in an appropriate alternative location, served by sustainable modes of transport; or c) It can be demonstrated that there is no current or forecast future demand for the use or an alternative social or community use through provision of marketing information and an impact assessment to show why the site cannot support the social or community use and identify impacts on users; And d) The premises or site cannot readily be used for, or converted to, any other community facility. (2) Where a use is no longer economically viable, the Council will require supporting information setting out reasons as to why the use is no longer viable and cannot be made viable in the foreseeable future. This may include details of previous use, accounts and marketing information</p>	<ul style="list-style-type: none"> A vital part of this is ensuring the NHS continues to receive a commensurate share of developer contributions to mitigate the healthcare impacts arising from growth and help deliver transformation plans. We concur with Parts 3 and 4 of preferred Policy 10 which seeks to bring forward improvements to health facilities. We also believe that the cumulative impacts of smaller residential developments should also be recognised, and a vital part of this is ensuring the NHS continues to receive a commensurate share of developer contributions to mitigate the healthcare impacts arising from growth and help deliver transformation plans. Parts 1 and 2 of preferred Policy 10 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed 	<ul style="list-style-type: none"> Noted. The CIL for TRDC can be spent on healthcare facilities. Applications can be made by NHS Herts Valleys CCG. Where S106 is required (for developments outside of the CIL Charging Schedule) developer contributions can be sought through the existing processes. Noted. Suggested policy change to Policy Option 10 – Social and Community facilities considered acceptable together with a short paragraph under Reasoned Justification Additional information about existing health infrastructure to be used to inform Infrastructure Delivery Plan. 	<p>Policy Option 10 – Social and Community Facilities to be amended as follows:</p> <p>Projection of Existing Facilities (1) d) The premises or site cannot readily be used for, or converted to, any other community facility unless the loss or change of use of facilities arises from an NHS Service modernisation strategy following a wider public service estate rationalisation programme.'</p> <p>Inclusion of following additional wording (in blue italics) be included in Policy 10 Part 1 to make this statement more robust: d. The premises or site cannot readily be used for, or converted</p>

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		<p>demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time and that no suitable user has been/or is likely to be found New Provision and Enhancement</p> <p>(3) The council will support proposals to provide new and/or extended or enhanced social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment against all relevant Local Plan policies.</p> <p>(4) Social and community infrastructure will be funded through the Community Infrastructure Levy (CIL) and/or section 106 planning obligations (as appropriate). In addition, new and/or extended on-site provision of social and community infrastructure may be required as part of the supporting infrastructure for significant new housing and mixed-use development proposals where it is necessary to mitigate the impacts of the development on local services and meet the needs of occupiers."</p> <p>We support the opportunity for Three Rivers District Council and other partners to engage in the preparation of the Plan; there is a well-established connection between planning and health; in so far that the planning system has an important role in creating healthy communities. Planning can not only facilitate improvements to health services and infrastructure thereby enabling the health providers to meet changing healthcare needs but planning also provide a mechanism to address the wider factors of health.</p> <p>A vital part of this is ensuring the NHS continues to receive a commensurate share of developer contributions to mitigate the healthcare impacts arising from growth and help deliver transformation plans. We concur with Parts 3 and 4 of preferred Policy 10 which seeks to bring forward improvements to health facilities. We also believe that the cumulative impacts of smaller residential developments should also be recognised, and a vital part of this is ensuring the NHS continues to receive a commensurate share of developer contributions to mitigate the healthcare impacts arising from growth and help deliver transformation plans.</p> <p>However, we would like to highlight that presently, Parts 1 and 2 of preferred Policy 10 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of superfluous and unsuitable healthcare facilities for best value can be prevented or delayed.</p> <p>The policy currently fails to take into account that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services where it can be demonstrated that community facilities would be lost or have their use changed as part of a wider NHS estate reorganisation programme.</p> <p>Having met the NHS testing and approval processes before being declared surplus, it should be accepted that this provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available.</p> <p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that NHS sites are not strategically constrained by restrictive local planning policies. Where such restrictive policies are in place, the reorganisation of underutilised facilities can be delayed.</p> <p>In turn, there are direct implications for the provision of quality healthcare facilities and services, as the reinvestment of capital in modern and fit-for-purpose facilities is prevented or delayed, with ongoing revenue spent on maintaining inefficient parts of the estate.</p> <p>To confirm, a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. Furthermore, NHSPS estate code requires that any property to be disposed of is first listed on "e-PIMS", the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their potential use for it. Where NHS commissioners can demonstrate that healthcare facilities are in need of reorganisation, which might include the disposal or development of a facility, there should be a presumption that such sites are suitable for other uses and should not be subject to restrictive policies.</p> <p>With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via modification of the wording of Plan policies that ensure that we are able to promptly and efficiently respond to the needs of the population as they arise.</p> <p>The NPPF states that Local Plans by nature to adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 92b).</p> <p>We would suggest the inclusion of following additional wording (in blue italics) be included in Policy 10</p> <p>Part 1 to make this statement more robust: <i>'Proposals for the redevelopment or change of use of any premises resulting in the loss of social or community facilities, or services that support the local community, will not be permitted unless</i> <i>d. The premises or site cannot readily be used for, or converted to, any other community facility unless the loss or change of use of facilities arises from an NHS Service modernisation strategy following a wider public service estate rationalisation programme.'</i></p> <p>This change would directly affect the soundness issues as outlined above; and would ensure that the</p>	<p>at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of superfluous and unsuitable healthcare facilities for best value can be prevented or delayed.</p> <p>The policy currently fails to take into account that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services where it can be demonstrated that community facilities would be lost or have their use changed as part of a wider NHS estate reorganisation programme.</p> <p>Having met the NHS testing and approval processes before being declared surplus, it should be accepted that this provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available.</p> <p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that NHS sites are not strategically constrained by restrictive local planning policies.</p> <p>Where such restrictive policies are in place, the reorganisation of underutilised facilities can be delayed.</p> <ul style="list-style-type: none"> The NPPF states that Local Plans by nature to adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 92b). <p>We would suggest the inclusion of following additional wording (in blue italics) be included in Policy 10 Part 1 to make this statement more robust: <i>'Proposals for the redevelopment or change of use of any premises resulting in the loss of social or community facilities, or services that support the local community, will not be permitted unless</i> <i>d. The premises or site cannot readily be used for, or converted to, any other community facility unless the loss or change of use of facilities arises from an NHS Service modernisation strategy</i></p>	<ul style="list-style-type: none"> Noted. Agreed amended wording. 	<p>to, any other community facility unless the loss or change of use of facilities arises from an NHS Service modernisation strategy following a wider public service estate rationalisation programme.'</p> <p>Do we have a joint needs Assessment?</p>
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			<p>NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p> <p>Summary Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses. This should include a presumption in line with national policy that those sites are suitable for other uses and should not be subject to overly restrictive planning policies. NHSPS thanks Three Rivers District Council for the opportunity to comment on the Preferred Issues Plan and hopes the proposed amendments to Policy 10 are considered constructive and helpful. Additional information provided about existing health provision</p>	<p>following a wider public service estate rationalisation programme.’ This change would directly affect the soundness issues as outlined above; and would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p> <ul style="list-style-type: none"> Additional information about existing healthcare provision provided 		
SC_00 023_C Croxley Green Parish Council	Croxley Green Parish Council		<p>Croxley Green Parish Council believes that social and community facilities should be run as locally as possible, i.e. by Parish Councils, local associations or community groups wherever possible. Ownership should be passed to the local level from TRDC where appropriate. In particular the proposed policy would support retaining the Red Cross Centre in Croxley Green as a community asset and community building, and we consider that the policy should be extended. We draw the District Council's attention to the strength of feeling about the future of the Red Cross building and the support expressed through a local petition.</p>	<ul style="list-style-type: none"> Social and community facilities should be run as locally as possible, i.e. by Parish Councils, local associations or community groups wherever possible. the proposed policy should support retaining the Red Cross Centre in Croxley Green as a community asset and community building, and we consider that the policy should be extended. 	Noted.	We could consider as part of the social and community facilities chapter, a criteria based policy on the loss of social and community infrastructure. As part of that policy there would be reference to viability.
SC_00 024_A Langley Parish Council	Abbots Langley Parish Council	yes	agree	<ul style="list-style-type: none"> support 	Noted	No action
SC_00 026_H HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Children's Services (Early Childhood Services) Section 6 of the Childcare Act 2006 places a duty on all local authorities to secure sufficient childcare for working parents, or parent, who are studying or training for employment for children aged 0 to 14 (19 years for disabled children). HCC also has a statutory responsibility to provide universal Free Early Education (FEE) for 3 and 4 year olds. HCC also has had a statutory responsibility to provide 15 hours FEE to eligible vulnerable 2-year-old children across Hertfordshire. An extended entitlement of an additional 15 hours free childcare was introduced for working parents in Hertfordshire in September 2017.</p> <p>Provision of all the above entitlements are provided in schools, private and independent pre-schools, day nurseries and childminders. In addition to FEE places, HCC has a duty to ensure there are sufficient childcare places for 0 to 14-year-old children (age 19 for children with special education needs S.E.N.D.) in pre-schools, day nurseries and out of school clubs, which can run either from school locations or other community facilities.</p> <p>Three Rivers is the eighth most deprived area in the county of ten and the number of working households is higher than other areas of the county. The demand for the new extended childcare entitlement will be high and additional childcare provision will be required in those areas identified as insufficient or near to sufficient to support this new demand. If more private housing is developed than the demand for these places will increase further. One of the Three Rivers areas falls into the 30% most disadvantaged within the County. As the two year old free early education scheme is only available for 6 disadvantaged children, this indicates that the need for these places will be higher in these areas than the rest of the County. Overall at this current time there are sufficient places to meet demand but the size of the new developments being planned will have considerable impact on the availability of free early education and childcare places overtime and this has to be factored into the development discussions.</p> <p><u>Proposed Policy on Education Allocations Children's Services</u> (School Place Planning). The county council supports a standalone policy on proposed education allocations. However, it is considered that the wording of this policy should set out where the new education allocations are to be located within the district (both primary and secondary), as this will support the information contained within the individual education allocations that should be listed and elaborated further under the following section: 'Proposed Education Allocations.' It is therefore suggested that the wording is amended as follows. It is considered that a site for a new secondary school should also be included in this policy, in order to meet the pupil yield requirements subject to further discussion between the county council and the district council.</p> <p><u>Education allocations for new primary and secondary schools have been identified within the district. These will cater for the pupil yield generated from the housing site allocations that are contained within the local plan. Sites for new primary schools have been identified within the following Sites for Potential Allocation:</u> • West of the Kings Langley Estate, Abbots Langley (Site CFS26c); • Batchworth Golf Course (Site OSPF22); • Land to the south of Shepherds Lane and west of the M25 (Site</p>	<ul style="list-style-type: none"> The county council supports a standalone policy on proposed education allocations. However, the wording of this policy should set out where the new education allocations are to be located within the district (both primary and secondary), as this will support the information contained within the individual education allocations that should be listed and elaborated further under the following section: 'Proposed Education Allocations. It is considered that this section should be expanded to include all additional education allocations that are listed within the Proposed Policy on Education Allocations and the modifications highlighted within these representations. This also includes an additional secondary school site as well as land to provide a new SEND school and a detached playing field to facilitate expansion of existing secondary school(s). Individual inset maps should be included within this section that indicate where each education allocation is to be located within each site, along with a school build zone that should (where possible) be removed from the Green Belt. The county council can assist the district council in relation to this matter, prior to the forthcoming regulation 19 consultation. Community protection The current provision of fire service facilities in the District is sufficient, HFRS is also aware of the increased risk presented by the HS2 railway construction project within Three Rivers, although at present, HFRS do not believe that this requires any 	Noted.	A draft policy and section on education allocations will inform the next reiteration of the Local Plan.

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	<p><u>EOS7.0): • Land to the west and south of Maple Cross (Site EOS12.2); 5 • Land at Carpenders Park Farm-Northern Parcel (Site CFS69a) 6 , or • South of Little Oxhey Lane (Site PCS47):</u></p> <p><u>A site for a new secondary school has been identified at Site: CFS11: Carpenders Park Farm, Oxhey Lane that will cater for Three Rivers' needs, along with some of Hertsmere and Watford Boroughs. The following sites have been allocated for education to facilitate new secondary schools, or the expansion of existing schools:</u></p> <ul style="list-style-type: none"> • <u>Land at Long Lane, Mill End, Rickmansworth (adjacent to The Reach Free School);</u> • <u>Land at Little Green Lane (former Durrants Playing Field)7</u> <p><u>The location of these new and existing education allocations are shown on the following inset maps. A site for a new SEND school has been identified at Durrants Lane, Croxley Green. Three Rivers District Council will continue to work with the County Council, adjoining authorities and other interested parties to identify the most appropriate sites to meet identified educational needs. Identified education sites for new primary or secondary schools will be safeguarded for educational use. Proposals for further education facilities that are not identified within this plan, will be dealt with on a case-by-case basis, should the need arise. Supported.</u></p> <p>Children's Services (School Place Planning)</p> <p>As a forward planning tool, the county council is using a tiered approach to calculating the level of education provision that should be planned for to mitigate the potential child yield arising from emerging local plan allocations. This tiered approach uses data from our pupil yield study. It is considered that a tiered approach to pupil yield can reflect a more refined settlement-based strategy based on the forms of development likely to come forward in a specific area. The tiered approach is used in order to estimate the child yield that could be generated by each respective development and therefore the level of additional capacity the county council would wish to plan to be able to provide. The county council therefore considers this approach to be sufficiently robust to inform the district council of the need for additional education provision within this draft local plan regulation 18 consultation.</p> <p>Community Protection</p> <p>The following Hertfordshire Fire & Rescue Service (HFRS) stations lie within Three Rivers District: • Rickmansworth: a station which has one Fire Engine currently crewed on the 'day crewing plus system' and also one of Hertfordshire Fire & Rescue Services Damage Control Unit (DCU) With regard to the current provision of fire service facilities in the District, no changes are anticipated at the present time, particularly when the support afforded by the close proximity of Fire Stations in Watford and Dacorum (Watford, Garston and Kings Langley) are factored in. Although HFRS will always examine the possibility of re-locating stations should an opportunity arise in the future that is both economically and operationally viable.</p> <p>In addition, future consideration of the re-siting of Garston fire station towards Aldenham may be an option (should a site become available) which may then allow combination with Borehamwood. The county council would need to consider carefully the impact of this on attendance times to new developments. HFRS is also aware of the increased risk presented by the HS2 railway construction project within Three Rivers, although at present, HFRS do not believe that this requires any additional Fire and Rescue assets in the area. At present though, HFRS does not believe there is a need for additional Fire Stations in the District to support the indicated housing figures. However, HFRS would continue to wish to see a recommendation for sprinklers in all new buildings including domestic properties, in order to form part of an integrated fire safety provision, including suitable and sufficient water mains and hydrants.</p> <p>Library Services</p> <p>Libraries in Three Rivers function as community hubs offering services and facilities to cater for a range of community needs including those of children, students, job seekers, and the elderly. They offer free, authoritative, non-judgemental information services and supported access to online resources and services, as well as providing access to books, DVDs, magazines, community language material, computers and the internet, an online reference service, ICT-based and other learning opportunities. They are neutral places that promote community health and wellbeing. HCC has a strategy for its libraries. HCC promotes libraries in three different tiers in order to clarify the services available to communities:</p> <ul style="list-style-type: none"> o Tier 1 libraries are centrally located in large towns and offer the broadest range of stock and services, and the longest open hours. They are staffed by library staff; HCC invites volunteers to support the delivery of some services and activities. There are no Tier 1 libraries in Three Rivers. The nearest Tier 1 library for Three Rivers is Watford Central. o Tier 2 are located in smaller towns and provide core library services and a wide range of popular stock. Additional services are tailored to meet local need/demand. Tier 2 libraries are staffed during core hours; HCC seek to extend access through volunteer supervised self-service. There are four Tier 2 libraries in Three Rivers, Rickmansworth being the largest and busiest service point in the district, and the other three are based in Oxhey, Croxley Green and Abbots Langley. o Tier 3 libraries in smaller communities and villages and provide self-service access to library services, including the issue and return of books, access to computers/technology and study space and staff assistance via the LibraryLink service (video link to another library). HCC invites local 	<p>additional Fire and Rescue assets in the area.</p> <p>Libraries</p> <ul style="list-style-type: none"> • Future provision- Any increase in the population arising from new housing developments will impact on services and will therefore necessitate an increase in service provision in order to take account of additional demands on the service. HCC will seek contributions from developers (or from CIL receipts) for service improvements appropriate to the scale and nature of proposed developments. 		
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			<p>communities to add value to these self-service facilities through volunteer support and the provision of additional activities and services as decided by the local community. There is one Tier 3 library in Three Rivers, which is based in Chorleywood.</p> <p>Future Library Provision in Three Rivers -Any increase in the population arising from new housing developments will impact on services and will therefore necessitate an increase in service provision in order to take account of additional demands on the service. We will therefore seek contributions from developers (or from CIL receipts) for service improvements appropriate to the scale and nature of proposed developments. Further guidance and workings are available in Appendix 6 to the Hertfordshire Guide to Developer Contributions.</p>			
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Q11. Should we have considered alternative options?

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HEALTH AND WELLBEING

Q12. Do you think the Preferred Policy Option for Health and Wellbeing is the right approach?

SC_P1_Sport England	Sport England	Yes	<p>This policy option is supported due to its requirement for development to be designed to provide the necessary infrastructure to encourage physical exercise This would be consistent with Sport England's Public Health England's Active Design guidance https://www.sportengland.org/how-we-can-help/facilitiesand-planning/design-and-cost-guidance/active-design. This would also accord with paragraphs 91 and 92 of the NPPF and Sport England's 'Uniting the Movement' Strategy. The policy option is also supported as requires HIAs to be prepared in accordance with Hertfordshire County Council's guidance for major developments and part of a HIA would be expected to include the consideration of the opportunities for encouraging physical activity through the design of a development. I would also like to point out an inconsistency in part (3) of the policy which states that HIAs are required for residential developments over 100 or more dwellings while paragraph 6.11 of the reasoned justification refers to 50 homes. It is understood that 100 or more dwellings if the correct threshold for HIAs.</p>	<ul style="list-style-type: none"> Supports policy as consistent with Sport England's guidance The correct threshold for Health Impact Assessments are for 100 dwellings (as stated in the draft policy) and not (as set out paragraph 6.11 of the reasoned justification 50 homes. 	<p>Noted</p> <p>Agreed. Amendment to paragraph 6.11 to ensure consistency.</p>	<p>Change to reasoned justification at 6.11</p> <p>To ensure that Health and Wellbeing is considered in proposals for development we will require that Health Impact Assessments (HIAs) are submitted with planning applications for major residential developments of 50 100 or more dwellings and for non-residential developments of 1,000sqm or more in accordance with the Hertfordshire Public Health's Position Statement on HIAs available at.....'</p>
SC_00_023_Croxley Green Parish Council	Croxley Green Parish Council		<p>The current policy 11(2) is purely reactive; there should be a more proactive policy to secure suitable provision within the District. There is an urgent need to provide a suitable site (or sites) for new health care provision within Croxley Green. The present health and medical facilities in Croxley Green are inadequate to meet the needs of the present population of Croxley Green. The Parish Council considers that providing better health facilities, in particular doctors' surgeries with the capacity to deliver a wide range of health services for the existing and projected population, should be the priority for development in Croxley Green before any more residential properties are built in the area. We draw particular attention to the detailed response submitted by our local doctors' surgeries about the urgent need for both to have larger and more modern premises to be able to meet current demands and provide a wider range of services locally in line with changing NHS requirements.</p>	<ul style="list-style-type: none"> The current policy 11(2) is purely reactive; there should be a more proactive policy to secure suitable provision within the District. 	<p>Noted. The Strategic Joint Needs Assessment will identify what new healthcare infrastructure would be required over the plan period.</p>	<p>Do we have a joint Strategic Needs Assessment?</p>
SC_00_024_Abbots Langley Parish Council	Abbots Langley Parish Council		<p>Agree in principle, but surely this has to also be taken to the base level of community design, not just at a district level, since covid, there has been an upsurge in people looking more directly at their surrounding and the effect on their wellbeing, the council should make a requirement of this and potentially use the point system as set by the RIBA.</p> <p>The RIBA has developed the Social Value Toolkit (SVT) to evaluate the impact on design of developments from housing through to communities and into other fields. The SVT applies monetary results for various results, for instance:- 2. I feel in control of my life – currently valued at £15,894 per annum by SVT. 3. I talk to my neighbours regularly – currently valued at £4,511 by SVT. 4. I feel a sense of belonging in my neighbourhood – currently valued at £3,753 by SVT. 5. I am able to take frequent mild exercise – currently valued at £3,537 by SVT. 6.</p>	<ul style="list-style-type: none"> The Policy in its current state is lacking, and in needs to be in an enforceable statement and wants the council to adopt the RIBA the Social Value Toolkit (SVT) and the general design principles for developing Wellbeing focus on the design principles of permeability, external social spaces and mixed-use developments. 	<p>Noted. The NPPF sets out national space standards for residential developments and design guidance. The Councils SA includes a community health impact assessment.</p>	<p>No action</p>

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			I am active in a tenant's group – currently valued at £8,116 by SVT. The general design principles for developing Wellbeing focus on the design principles of permeability, external social spaces and mixed-use developments. 1. Prioritise placemaking that expresses identity and territory. 2. Create secure places for privacy. 3. Create places for social interaction. 4. Create vibrant mixed-use places. 5. Provide high quality permeable links to social amenities. 6. Provide high quality pedestrian public realm. 7. Create inclusive places for community interaction. 8. Create secure places with overlooking views. The above points could be mandatory objectives within the planning system for all new development, and could be a standard to assess all existing communities within the district and assess where further input is required? Further documentation is noted https://www.architecture.com/-/media/GatherContent/Work-withUs/Additional-Documents/PlacesWherePeopleWanttoLivepdf.pdf This has approach has gained pace since Covid and should be utilised in all proposed and existing communities, I feel that the Policy in its current state is lacking, and in needs to be in an enforceable statement.			
SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure		Preferred Policy Option 11, Health and Wellbeing Public Health. Paragraph 1 should specify a focus on ensuring that all communities have access to healthy and affordable food options. This could go a step further by committing to limiting the concentration of take-aways and other high-sugar/high-fat food outlets in areas where their concentration is already high, or there are sensitive receptors (e.g. schools). It should be noted that Health Impact Assessments (HIAs) are required for major residential developments of 100 or more dwellings, instead of 50 or more dwellings, as currently stated. LEADS. The county council agrees with the direction of this policy but considers that a stronger reference should be made to addressing health inequalities through identifying areas of Green and Blue Infrastructure deprivation and addressing this through new developments and through design coding where appropriate.	<ul style="list-style-type: none"> Paragraph 1 should specify a focus on ensuring that all communities have access to healthy and affordable food options. It should be noted that Health Impact Assessments (HIAs) are required for major residential developments of 100 or more dwellings, instead of 50 or more dwellings, as currently stated. The county council agrees with the direction of this policy but considers that a stronger reference should be made to addressing health inequalities through identifying areas of Green and Blue Infrastructure deprivation and addressing this through new developments and through design coding where appropriate. 	<ul style="list-style-type: none"> Noted. Agreed amendments to be made to policy. 	Change to reasoned justification at 6.11 To ensure that Health and Wellbeing is considered in proposals for development we will require that Health Impact Assessments (HIAs) are submitted with planning applications for major residential developments of 50 100 or more dwellings and for non-residential developments of 1,000sqm or more in accordance with the Hertfordshire Public Health's Position Statement on HIAs available at.....'
SC_00 028_C anal & River Trust	Canal & River Trust		The canal corridor represents a multifunctional asset, providing linkages to local facilities, recreational opportunities, and a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. The provision of S106 & CIL contributions towards the improvement of the towpath and access points along the Grand Union canal would aid in unlocking its potential, which in turn, would contribute to enhancing the health and wellbeing of local communities	<ul style="list-style-type: none"> Provision of S106 & CIL contributions towards improvement of towpath and access points along Grand Union canal would aid in unlocking its potential, and contribute to enhancing the health and wellbeing of local communities 	Regulation 59. (1) states that "A charging authority must apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area. The 'district' CIL pot can be spent anywhere within the district and is not site specific. A bid must be submitted for anyone wishing to request funds for infrastructure. It will then be looked at and assessed by various bodies before a decision can be made as to whether the funds can be granted from the CIL pot.	No action

Q12. Should we have considered alternative options?

CARBON DIOXIDE EMISSIONS & ON-SITE RENEWABLE ENERGY

Q13. Do you think the Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach?

SC_P1 _0000	Home Builders Federation		The Council will need to consider the necessity of this policy should the Government bring forward its proposed amendments to building regulations. The housebuilding industry, through the HBF,	<ul style="list-style-type: none"> Council will need to consider the necessity of this policy should the 	<ul style="list-style-type: none"> NPPF and Building Regulations allow for a higher target. Anticipated 	Draft policy to reflect new 2021 Part L.
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8_Home Builders Federation			recognises that there is a need to improve the environmental performance of new residential development. However, rather than have a variety of standards in every local plan, the HBF, and our members, consider a national and standardised approach to improving such issues as the energy efficiency of buildings, the provision of renewable energy and the delivery of electric vehicle charging points to be the most effective approach that balances improvements with the continued delivery of housing and infrastructure. The HBF considers a universal standard is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. As such we would recommend that the policy is deleted.	<ul style="list-style-type: none"> government bring forward its proposed amendments. HBF and members prefer a nationalised standard approach. Policy should be deleted 	changes to the Building Regulations will be accounted for in draft policy. 20% reduction to Pat L 2013 will be required until such a time building regulations are implemented.	<p>On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.</p> <p>As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.</p>
SC_00009_Sarratt Parish Council	Sarratt Parish Council	supports	<p>We support this policy but strongly believe that this policy does not go far enough. With various future net zero targets, including TRDC goal for the District to achieve net-zero by 2045, and the County wide target set by Herts CC of net-zero by 2050, we strongly believe the policy target “20% less carbon dioxide emissions than Building Regulations Part L requirements (2013)” is inadequate and will not support achievement of any net zero targets. We believe the target should require for all new buildings to be zero carbon ready and have carbon dioxide emissions 75% lower than Building Regulations Part L requirements (2013) (in line with the proposed Future Homes Standard). With the knowledge and technology available today, along with the agreed net zero targets, it would be counterproductive for the District not to take this opportunity to set these kind of targets in this plan</p> <ul style="list-style-type: none"> •Policy Option 12 on Renewable Energy – New developments must produce 20% less CO2 emissions than directed in the 2013 regs. SPC is committed to creating a more sustainable environment and therefore welcomes this new and tangible measure, but would also prefer the target is raised to align with TRDC’s goal for the District to achieve net-zero by 2045 and the County wide target set by Herts CC of net-zero by 2050; 	<ul style="list-style-type: none"> • Support the policy • Doesn’t think it goes far enough and that target should require for all new buildings to be zero carbon ready and have carbon dioxide emissions 75% lower than Building Regulations Part L requirements (2013) (in line with the proposed Future Homes Standard). 	Support noted Noted. National policy and guidance does not allow us to seek higher carbon reductions than the 20% proposed in the draft policy at the moment. It is anticipated that the government will introduce a two-stage approach to implement the Future Homes Standard with the first due in June 2022 requiring a 31% uplift in energy efficiency requirements compared to the current standard (Part 2013) with the second due when the Future Homes Standard regulations come into force – anticipated in 2025- at which point development proposals would have to demonstrate 75-80 per cent lower than those built to current Building Regulations standards. Considering the government’s track record of setting out proposed changes to the Building Regulations and not doing so and the likelihood of the Future Homes standard being implemented during the first 5 years of the Local Plan a change to the draft policy is required to address both scenarios.	<p>Draft policy to reflect new 2021 Part L.</p> <p>On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.</p> <p>As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.</p>
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	No	It is inadequate in the face of the challenges of climate change. TRDC should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out. Croxley Green Parish Council considers that all new build should be required to meet zero carbon targets. Adequate ventilation is required alongside energy efficiency. There is an existing and growing risk of older people and young children overheating in poorly designed and poorly ventilated homes.	<ul style="list-style-type: none"> • A higher standard should be set to face challenges of climate change. 		<p>Draft policy to reflect new 2021 Part L.</p> <p>On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.</p> <p>As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.</p>
SC_00024_Abbots Langley	Abbots Langley Parish Council	No	I believe we should be aiming higher, however I am aware that National Policy drives this. We are not beyond the realms of creating all new homes zero Carbon	<ul style="list-style-type: none"> • Understands that national policy drives the targets but suggests we aim higher. 	NPPF and Building Regulations allow for a higher target. Anticipated changes to the Building Regulations will be accounted for in draft policy. 20% reduction to Pat L 2013 will be required until such a time building regulations are implemented.	<p>Draft policy to reflect new 2021 Part L.</p> <p>On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021.</p> <p>As part of the climate change emergency and HCC work with adjoining boroughs – we need to agree a consistent approach to on-site carbon reduction target.</p>

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SC_00 026_H CC Growth and Infrastr ructure	HCC Growth and Infrastructure	<p>The county council does not agree with this policy wording as it currently stands. Building Regs part L is being reviewed and will likely be reviewed again during the lifetime of this local plan, and it is not the only Building Regs standard to affect energy efficiency.</p> <p>The Future Homes Standard is a set of standards that will complement the Building Regulations to ensure new homes are subject to higher energy standards. The standard will comprise a series of amendments to Part F (ventilation) and Part L (conservation of fuel and power) of the Building Regulations for new homes, and will be introduced in 2023. Further information can be found on the Government's website. Therefore, it is suggested that an approach requiring the submission of an Energy and Carbon strategy setting out how the building design, fabric and construction methods will reduce energy demand, the anticipated carbon dioxide emissions and the carbon emissions savings they achieve in excess of current building regulation requirements. Whilst local authorities are currently still permitted to set targets above building regulations, we note that this may not remain the case. We have not seen the evidence for a 20% saving over the current or new building regs, but if TRDC is confident that this is feasible and viable (especially given the future tightening of standards) then we have no objection to this target.</p> <p>It is to recommend that the policy could usefully require developers to publish their aspirations for in-use regulated energy performance using the metric kWh/m2/year (which is understandable to non-experts as it is directly comparable with domestic meter readings) to inform potential buyers and future buyers of the comparative cost of running the dwelling. This helps purchasers to directly consider energy performance as part of their purchasing choices. (Regulated energy covers space heating and cooling, hot water, ventilation, fans, pumps and lighting).</p>	<ul style="list-style-type: none"> Object. The county council does not agree with this policy wording as it currently stands. Reference should be made to Part L building Regs and the Future Homes Standard. We have not seen the evidence for a 20% saving over the current or new building regs, but if TRDC is confident that this is feasible and viable (especially given the future tightening of standards) then we have no objection to this target. 	<ul style="list-style-type: none"> Agreed. TRDC will continue through DTC discussions our approach to zero carbon targets. 	Do we have evidence to support the target of 20%? if not we should remove it until we agree, together with HCC and partners our approach to carbon zero targets.
SC_00 029_H ertsme re Boroug h Council	Hertsmere Borough Council	Preferred Policy Options 12 and 13 seek to reduce the carbon emissions of new development, which we welcome. However, the plan could perhaps be future-proofed through the inclusion of a more ambitious zero-carbon target for new development.	<ul style="list-style-type: none"> Welcome the policy options to reduce carbon emissions Could perhaps future proof through the inclusion of more ambitious targets 	<ul style="list-style-type: none"> Noted. TRDC will continue through DTC discussions our approach to zero carbon targets. 	Do we have evidence to support the target of 20%? if not we should remove it until we agree, together with HCC and partners our approach to carbon zero targets.

Q13. Should we have considered alternative options?

ADAPTING TO CLIMATE CHANGE AND SUSTAINABLE CONSTRUCTION

Q14. Do you think the Preferred Policy Option Adapting to Climate Change and Sustainable Construction is the right approach?

SC_00 009_S arratt Parish Council	Sarratt Parish Council	<p>We support the inclusion of sustainable flood management, but we are concerned that this is open to wide interpretation. So if there are any standards or frameworks that can be referenced, we believe that would help ensure the desired outcomes</p> <p>We support the inclusion of water consumption targets. While the target is still too high, we note the limitations of scope of authority</p> <p>We support the inclusion of BREEAM standard. We question the reason to limit application of this standard to major non-residential development and why to include a very broad escape clause "unless this is demonstrated to be unviable". We urge that this very good requirement is revised and strengthened to cover all developments. If BREEAM is not deemed usable for smaller developments there are other appropriate standards which could be used to aid desired outcomes.</p>	<ul style="list-style-type: none"> Support inclusion of sustainable flood management but concerned that they are open to interpretation and suggests use of standards or frameworks Supports the inclusion of water consumption targets – would like higher but understands limitations of scope of the authority Support BREEAM standards but questions why only applied to major non-residential development and the inclusion of 'unless this is demonstrated to be unviable' and requests BREEAM applies to all developments or other standard used 	<ul style="list-style-type: none"> Noted. Hertfordshire County Council are the Lead Local Flood Authority (LLFA) and set the requirements for the sustainable drainage systems that the policy relates to. The LFA sets guidance and standards which are available at https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/water/surface-water-drainage/guidance-for-developers.pdf Noted. Reference will be made to the water efficiency standards as set out within Building Regulations. BREEAM sets the standard for best practice in sustainable building design, construction and operation. These standards can only be applied to major non-residential development and cannot be adapted for residential development. The Code for Sustainable Homes which was used for residential developments has now been withdrawn and has been replaced by new national technical standards which comprise new additional optional Building Regulations regarding water and access as well as a new national space standard (this is in addition to the existing mandatory Building 	Make reference to water efficiency targets within policy.
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					Regulations). These additional options (which are comparable with the requirements for the former Code for Sustainable Homes Level 4) can be required by a planning permission and are included in the Draft Local Plan.	
SC_00 019_W atford Boroug h Council	Watford Borough Council	yes	The approach to reducing carbon emissions when new development comes forward is supported. This will contribute towards addressing the climate change emergency	<ul style="list-style-type: none"> support 	Noted	No action
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		The policy only mentions major developments. All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated. There should be a preference for using low embodied carbon materials. Also attention should be paid to the need to mitigate extreme weather, including excessive heat. Buildings should be designed to be kept cool by low carbon means such as shading and ventilation. We support the approach in general.	<ul style="list-style-type: none"> All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, not just major schemes. 	Noted.	We could require an energy assessment statement alongside planning applications?
SC_00 024_A bbots Langle y Parish Council	Abbots Langley Parish Council		The statement appears woolly and unenforceable, we need a list of bullet point requirements in our policy. We should set a limitation of the carbon footprint of materials to ensure that we can bolster local economies and create communities of local character. Sustainability Statements are generally a 'copy and paste', exercise and generally rarely complied to. How do we monitor its compliance? Also maybe we should have a policy that all new sites have to utilise rainwater and sewage is dealt with on site, or if not, could the new housing be forced to have sewage holding tanks to operate in times of heavy rain to avoid overloading the sewers? We have to tackle this at the point of planning and construction. I do not think the policy really takes into account the housing we are getting, and the effect on the already overburdened infrastructure.	<ul style="list-style-type: none"> Want a bullet point list of requirements in the policy as current policy unenforceable. 	Noted.	No action
SC_00 026_H CC Growth and Infrastr ucture	HCC Growth and Infrastructure		<p>Sustainable Hertfordshire The county council declared a climate emergency in July 2019, as a response to the need to act locally, having observed the global impacts of climate change including those from within Hertfordshire; dry riverbeds, reduced water supply, intense weather events, localised flooding and Hertfordshire specific loss of habitat and species. The county council has since published the Sustainable Hertfordshire Strategy which outlines HCC's nine ambitions as to how the authority will lead as an organisation and enable and inspire a sustainable county.</p> <p>The county council is very aware that action cannot be taken alone. In parallel to the work of HCC, all ten Hertfordshire authorities have unanimously agreed that a countywide approach to tackling climate change and ensuring sustainable development principles are at the forefront of the growth agenda. The Hertfordshire Climate Change and Sustainability Partnership was created in early 2020, which consists of all LPAs and the Local Enterprise Partnership (LEP). Four priority areas for action were identified which are Water, Carbon, Biodiversity and Transport. The county council has an officer working group to support the partnership and four subgroups to undertake the work on each theme. The primary purpose of the four subgroups is to prepare action plans for each of the priority areas and these action plans will cover which are resilience, mitigation and adaptation. Planning has a significant role to play in the development and implementation of suitable policies and this too will be reflected in action plans.</p> <p>The following national and international policies, plans and initiatives should also be considered:</p> <ul style="list-style-type: none"> The government's 25 Year Environment Plan; Paris Agreement 2015; 	<ul style="list-style-type: none"> Adapting to Climate change- new wording suggested Sustainable design and construction-It is considered that the section Sustainable design and construction in the policy is a prescriptive approach with an emphasis on current legislation (which will be changed during the lifetime of the plan) and current priorities. It is suggested some changes for an outcome focused policy 	Agreed.	<p><u>Adapting to climate change</u></p> <p><u>2) The built and natural environment needs to be able to adapt to climate change. This requires the careful design of buildings, public realm, infrastructure and ecological services. Development proposals will be required to include a written adaptation strategy and clear design drawings to demonstrate (a) risk assessment of climate change impacts to the proposed development and the surrounding context (b) a masterplan indicating where protective and adaptive measures are to be taken, for example through layout, massing, public realm, green and blue infrastructure, (c) more detailed information at the building design level, for example massing, facades, materials, finishes, ground floor uses and design, minimising single aspect dwellings (d) building services measures (a reliance on powered cooling without appropriate design measures will not generally be acceptable).</u></p>

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		<p>• SDGs – recognising that improving health, education, reducing inequality, and spurring economic growth go hand in hand with tackling climate change.</p> <p>The co-benefits of the proposed natural climate solutions highlighted in the plan should be considered; for example, how planting trees not only captures carbon but also absorbs pollutant gases, prevents flooding, improves soil quality, improves the health of residents etc.</p> <p>Adapting to climate change</p> <p><u>2) The built and natural environment needs to be able to adapt to climate change. This requires the careful design of buildings, public realm, infrastructure and ecological services. Development proposals will be required to include a written adaptation strategy and clear design drawings to demonstrate (a) risk assessment of climate change impacts to the proposed development and the surrounding context (b) a masterplan indicating where protective and adaptive measures are to be taken, for example through layout, massing, public realm, green and blue infrastructure, (c) more detailed information at the building design level, for example massing, facades, materials, finishes, ground floor uses and design, minimising single aspect dwellings (d) building services measures (a reliance on powered cooling without appropriate design measures will not generally be acceptable).</u></p> <p>It is considered that the section Sustainable design and construction in the policy is a prescriptive approach with an emphasis on current legislation (which will be changed during the lifetime of the plan) and current priorities. It is suggested some changes for an outcome focused policy below:</p> <p><u>“Sustainable Design and Construction</u></p> <p><u>3) All major developments will be required to submit a Sustainability Statement. This should show how the development is be designed and will be constructed to: a) Make efficient use of materials and minerals and minimising waste b) Take a Fabric First approach to reduce energy requirements and carbon emissions c) Embody circular economy principles to reduce the need for virgin materials d) Balance demolition and excavation with fill and onsite construction e) Conserve top soil for future use either on or offsite, f) Minimise water use in construction and operation, g) Manage water courses, surface and drainage water to avoid flood risk on and offsite h) Provide at least 10% of biodiversity net gain, following the biodiversity hierarchy (avoid damage, minimise damage, on site BNG, local offset BNG) i) Be flexible and adaptable to the needs of future occupiers 4) Major developments will be expected to treat regulatory standards as a minimum target.”</u></p>			<p><u>Suggested wording for policy “Sustainable Design and Construction</u></p> <p><u>3) All major developments will be required to submit a Sustainability Statement. This should show how the development is be designed and will be constructed to: a) Make efficient use of materials and minerals and minimising waste b) Take a Fabric First approach to reduce energy requirements and carbon emissions c) Embody circular economy principles to reduce the need for virgin materials d) Balance demolition and excavation with fill and onsite construction e) Conserve top soil for future use either on or offsite, f) Minimise water use in construction and operation, g) Manage water courses, surface and drainage water to avoid flood risk on and offsite h) Provide at least 10% of biodiversity net gain, following the biodiversity hierarchy (avoid damage, minimise damage, on site BNG, local offset BNG) i) Be flexible and adaptable to the needs of future occupiers 4) Major developments will be expected to treat regulatory standards as a minimum target.”</u></p>
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Q14. Should we have considered alternative options?						
SC_00 017_C halfont St Peter Parish Council	Chalfont St Peter Parish Council		<p>The M25 and HS2 are highlighted as sources of noise, pollution and light pollution. The large number of homes being suggested for these areas will add to this blight with the additional cars on the lanes and surrounding roads. Page 19 – 9 states “Air pollutants (including dust and odour) have been shown to have an adverse effect on both health and the environment and it will be important to consider emissions arising from development including indirect emissions such as those attributable to associated traffic generation” Residents on these sites would already be dealing with pollutants from the M25 and HS2 which your SA acknowledges to be an issue and risk.</p>	<ul style="list-style-type: none"> Large number of homes will add to noise, pollution and light pollution from the M25 	<p>Draft policies in the Local Plan set out the requirements in relation to pollution (air, noise, light etc.) that development proposals will have to consider</p>	No action
				<ul style="list-style-type: none"> 		

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RENEWABLE LOW ENERGY DEVELOPMNETS

Q15. Do you think the Preferred Policy Option Renewable and Low Carbon Energy Developments is the right approach?						
SC_00009_Sarratt Parish Council	Sarratt Parish Council		We support this policy and would request that it is enhanced to mention Combined Heat and Power (CHP) schemes. We also request that all developments of 4 units and above must consider shared energy options.	<ul style="list-style-type: none"> Support the policy but request mention to Combined Heat and Power (CHP) schemes Request that developments of 4 units and above must consider shared energy options 	<ul style="list-style-type: none"> Noted. Decentralised energy systems typically use renewable energy sources, including small hydro, combined heat and power (CHP), biomass, solar and wind power. Further wording to be added for clarification. Noted. This is unlikely to be viable and be unduly onerous on small home builders. 	Change to draft policy to include reference to CHP. (1) Proposals for large-scale renewable energy developments, micro-renewables (such as, but not limited to, micro-wind turbines, micro-hydro and solar panels), or low and zero carbon and decentralised energy (such as, but not limited to Combined Heat and Power systems) will be supported subject to assessment of potential impacts on:
SC_00019_Watford Borough Council	Watford Borough Council	Yes	The overall approach is supported.	<ul style="list-style-type: none"> support 	Noted	No action
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	Yes	Croxley Green Parish Council considers the approach needs to be developed much further, with more specific and detailed targets, and become part of a fully sustainable strategy for any new residential or commercial developments. However, we support the approach in general.	<ul style="list-style-type: none"> Support the approach in general but the approach needs to be developed much further, with more specific and detailed targets, and become part of a fully sustainable strategy for any new residential or commercial developments. 	Noted	No action
SC_00024_AAbbots Langley Parish Council	Abbots Langley Parish Council	No	Why not insist that all new housing has its own heat and power generation on site. If we can make all new housing as 'off grid' as possible, then we would be moving in the right direction.	<ul style="list-style-type: none"> Suggestion as stated 	Noted. This is unlikely to be viable and be unduly onerous on small home builders.	No action
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure		Preferred Policy Option 14, Renewable and Low Carbon Energy Developments HCC supports the approach applied in this policy and have no comments on the policy wording. It is noted that building integrated renewables can contribute to a sense of place and we encourage TRDC to consider the positive visual impact that these can make when properly designed. The district council is encouraged to investigate suitable locations for renewable energy generation and propose these in the local plan. National Grid are an essential consultee in this as connections to a suitable network are required. It is considered that the district council should require viability assessments of decentralised heating and cooling networks on major developments over 100 homes, and larger mixed-use developments. We also encourage TRDC to carry out their own feasibility assessments for retrofitting decentralised energy systems in areas adjacent to urban extension sites.	<ul style="list-style-type: none"> Support policy approach and have no comments on policy wording. The district council is encouraged to investigate suitable locations for renewable energy generation and propose these in the local plan. National Grid are an essential consultee in this as connections to a suitable network are required. It is considered that the district council should require viability assessments of decentralised heating and cooling networks on major developments over 100 homes, and larger mixed-use developments. Encourage TRDC to carry out their own feasibility assessments for retrofitting decentralised energy systems in areas adjacent to urban extension sites. 	Noted.	TRDC to consider carrying out feasibility assessments for retrofitting decentralised energy systems in areas adjacent to urban extension sites.

Q15 Should we have considered alternative options?						
SC_00019_Watford Borough Council	Watford Borough Council	Yes	To encourage sustainable development and contribute towards addressing the climate change emergency, is there a more positive approach that could be set out for renewable energy development in the Green belt?	<ul style="list-style-type: none"> See comment 	Noted.	TRDC to consider carrying out feasibility assessments for retrofitting decentralised energy systems in areas adjacent to urban extension sites.

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Q21. Should we have considered alternative options?			
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FLOOD RISK AND WATER RESOURCES

Q16. Do you think the Preferred Policy Flood Risk and Water Resources is the right approach?			
SC_00 014_T hames Water	Thames Water	Support	<p>Thames Water support Preferred Policy Option 15 and in particular Section 3 which relates to wastewater infrastructure. In relation to wastewater infrastructure any necessary upgrades to the network will be delivered by Thames Water and funded through the Infrastructure Charge on new development.</p> <p>The time for delivering network reinforcement measures should not be underestimated. Local upgrades can take 18 months to 3 years to deliver with more strategic upgrades taking 3-5 years. Where necessary Thames Water would seek the inclusion of phasing conditions to ensure that the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed. As such the policy in Section 3 of Preferred Policy Option 15 is considered to be necessary to help ensure that there are no adverse impacts resulting from development such as pollution or land or watercourses or sewer flooding. It is suggested that additional supporting text is included for the policy advising developers to engage with Thames Water to discuss their wastewater infrastructure requirements at an early stage, prior to the submission of any planning applications. Such text could state:</p> <p>“The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p> <p>Omission of support for development at Maple Lodge Sewage Treatment Works</p> <p>In relation to sewage treatment works upgrades can take 3-5 years while implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to 10 years. Upgrades to sewage treatment works are funded through water bills which are set every 5 years. Water companies’ investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process.</p> <p>AMP7 covers the period from 1st April 2020 to 31st March 2025. Proposed growth in the catchment could result in a requirement for upgrades during AMP8 which will run from April 2025 to March 2030 depending on the scale of growth coming forward and the phasing of delivery. As such Thames Water are keen to work closely with local authorities and developers to understand where and when development will come forward so that any necessary upgrades can be programmed accordingly. For information a copy of the position statement for Maple Lodge and Blackbirds Sewage Treatment Works is enclosed.</p> <p>Maple Lodge Sewage Treatment Works (STW) is located within the local authority boundary. The site is currently identified as a Major Developed Site in the Green Belt in the adopted Core Strategy and the Core Strategy acknowledges the potential need for development at the site. There are likely to be requirements for upgrades to the site in the future and as such it is considered that policies that support development of Maple Lodge STW should be included within the new Local Plan to assist with the delivery of infrastructure necessary to support growth.</p> <p>To further assist with delivery of essential infrastructure on the site it is considered that the site should be removed from the Green Belt. This would remove a potential constraint to the delivery of</p>

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	<p>essential infrastructure on a site and assist with ensuring the timely delivery or new infrastructure at the site which may be necessary to support growth or deliver environmental improvements. A Stage 2 Green Belt Assessment has been undertaken to assess the harm of releasing land for development to facilitate expansion of inset settlements. Given the size of Maple Lodge STW and its designation as a significant infrastructure site, it is considered that the Stage 2 Green Belt Assessment should also have assessed the harm of releasing the STW site from the Green Belt, particularly as development of the site is likely to be required to support growth within the catchment.</p> <p>It is considered that the site provides limited to no contribution to the purposes of checking the unrestricted sprawl of large built up areas; preventing neighbouring towns from merging into each other; and assisting in safeguarding the countryside from encroachment. As such the removal of the site from the Green Belt would not result in any harm to the Green Belt purposes.</p> <p>In relation to planned growth at Maple Lodge STW and Blackbirds STW, the 'Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council, Watford Borough Council, Welwyn Hatfield Borough Council Water Cycle Study (2010)' (WCS), stated that capacity of the treatment plant was likely to become an issue within the development plan timescales. The summary of information from the WCS is still considered valid. With regards to the required upgrades identified however, there are still some uncertainties that may have to be investigated further once growth in each of the Local Planning Authority (LPA) areas become clearer. With the growth information previously made available, our modelling and analysis has suggested that neither Maple Lodge STW or Blackbirds STW will require significant growth upgrades in AMP7 (1st April 2020 to 31st March 2025). Upgrades may however be necessary in AMP8 (1st April 2025 to 31st March 2030). We will continue to review the situation on a regular basis and as confidence grows in the degree and locations of growth, along with the forecast of delivery. Although it is useful to know high level forecasts (e.g. 10,000 dwellings between from 2011- 2031), it would be very difficult to assess the impact without further details regarding location, timing and phasing of development.</p> <p>Thames Water use LPA housing and employment growth figures and ONS data to help project likely increases in sewage flows to its STWs. We also take into consideration a range of other factors, including data on wastewater flows entering the STW. Using this information, we seek to ensure that the STWs have sufficient capacity to cater for the growth being proposed. Where capacity constraints at STWs are predicted, we aim to invest at the appropriate time to ensure our treatment permit levels continue to be met.</p> <p>As our sewerage network and the STWs are impacted by development in several other LPA areas, we also need to assess the cumulative impacts of these areas. It is important to understand that new dwellings do not create sewage; people do, so understanding population migration and occupancy rates in the catchment will be an important consideration as well as further changes to industrial and business discharges. The impact of changes to weather patterns also needs to be acknowledged.</p> <p>We therefore require confidence in the delivery and timing of developments, to know where to base our assessments. Until such information is received, we can only really acknowledge, monitor and invest in upgrades accordingly.</p> <p>As part of our five-year business plan, Thames Water advise Ofwat on the funding required to accommodate growth to ensure the STWs can continue to meet the standard required by the treatment consents.</p> <p>Where there are infrastructure constraints, Thames Water may require an 18-month to three-year lead time for provision of extra capacity to drain new development sites. If any large-scale engineering works are needed, the lead time could be up to five years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.</p> <p>Maple Lodge STW Maple Lodge STW currently treats a population equivalent (PE) of approximately 550,000. This is residential population plus the trade and business discharges converted to a population equivalent. As stated above, recent modelling assessments indicated that with the growth forecasts to date, we do not require significant growth upgrades at Maple Lodge STW in AMP7.</p>	<ul style="list-style-type: none"> That the existing Core Strategy identified the Maple Lodge Waste Water Treatment Works as a Major Development Site in the Green Belt due to the anticipated upgrades required on site and request that a separate policy be included in the new Local Plan to assist with the delivery of infrastructure necessary to support growth and that the site should be assessed as part of the Green Belt Review and removed from the Green Belt to remove a potential constraint to the delivery of essential infrastructure on a site and assist with ensuring the timely delivery or new infrastructure at the site which may be necessary to support growth or deliver environmental improvements Water Cycle Study (2010) concluded that upgrades to existing Maple Lodge and Blackbirds STWs would be needed in the plan period. Thames Water's modelling has shown that neither Maple Lodge or Blackbirds STW will require significant upgrades in the period from 1 April 2020 to 31 March 2025 but upgrades may be necessary in the period 1 April 2025 – 31 March 2030 (will be reviewed) Thames Water may require an 18-month to three-year lead time for provision of extra capacity to drain new development sites. If any large-scale engineering works are needed, the lead time could be up to five years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The Water Cycle Study (2010) states that, 'current flows are approaching the current process and hydraulic capacity at the WwTW. Creation of additional capacity would require the construction of new assets, which would require changing the layout of the existing site – however TWU are investigating diverting additional flows to Blackbirds WwTW in the future' At present, we do not need to alter the flow arrangement; however, the viability of this option will need to be investigated as we receive more accurate growth data. We are restricted in our options to accommodate growth at Maple Lodge STW by the lack of space to upgrade 	<ul style="list-style-type: none"> The Core Strategy retained the Major Developed Site in the Green Belt status of the Maple Lodge Wastewater Treatment Works to acknowledge that development may be necessary over the Plan period for strategic and operational reasons. The Site Allocations LDD also acknowledged this and reiterated the classification and stated that it was a significant infrastructure site in the Green Belt as well as providing a policy requiring any development to retaining the landscaped setting provided by mature vegetation on the site boundaries and area surrounding the site in any proposals for infilling or redevelopment and that any further buildings should be of comparable height to other nearby structures on the site. The Hertfordshire Water Study (2017) states that the Maple Lodge STW is predicted to require at least focused planning from 2021 onwards to ensure it can accommodate expected growth and that strategic interventions could be needed to ensure it has sufficient capacity in 2051. Acknowledge that Thames Water state that neither Maple Lodge nor Blackbirds STWs require upgrades in the period to 31 March 2025 but may be necessary between 1 April 2025 and 31 March 2030 (within the new local plan period) Acknowledge that Thames Water will be investigating the ability of Blackbirds STW to accommodate growth as the Maple Lodge site is restricted but also acknowledge that the provision of additional infrastructure may be required on the site Agree that consideration be given to the removal of Green Belt designation from the major developed site at Maple Lode Treatment works to allow redevelopment in the plan period to this significant infrastructure 	<p>New policy based on existing Core Strategy and Site Allocations (SA8) be included in new Local Plan. Green Belt Assessment to be looked at to see what harm there would be to the Green Belt.</p>
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		<p>The WCS states that, 'current flows are approaching the current process and hydraulic capacity at the WwTW. Creation of additional capacity would require the construction of new assets, which would require changing the layout of the existing site... TWU are investigating diverting additional flows to Blackbirds WwTW in the future' (pg41). At present, we do not need to alter the flow arrangement; however, the viability of this option will need to be investigated as we receive more accurate growth data.</p> <p>Blackbirds STW Blackbirds STW currently treats a PE of approximately 95,000. Blackbirds STW is a sub-catchment of Maple Lodge catchment, serving approximately 16% of the population and Maple Lodge STW treating the remaining 84%. It is fed almost exclusively by Drop Lane SPS which draws off a portion of the sewage that runs down the C-line sewer towards Maple Lodge STW. Currently, under normal conditions, the flows to Blackbirds STW from Drop Lane SPS are pumped at set rates. Therefore, as growth occurs upstream, the volume of flow may remain constant but the organic load requiring treatment will increase. We are assessing how this growth will potentially impact on both STWs and thus what upgrades / alterations may be required for us to comply with our consents.</p> <p>We are restricted in our options to accommodate growth at Maple Lodge STW by the lack of space to upgrade our plant. This is less of an issue at Blackbirds STW, where we could potentially accommodate higher flows by upgrading the site or fully utilising some existing, redundant plant. As highlighted in the WCS however, the site 'already has a tight ammonia consent (1.4 mg/l)' (pg41), which we would need to design to.</p> <p>It is therefore possible that in future, we may be able to alter the flow split or the volumes treated by the STWs, in order to accommodate growth in future AMPs. This may require significant investment at one or both sites, and discussions with the Environment Agency. We require more detailed growth forecasts from the LPAs, regarding locations, confidence in delivery, and phasing, to complete a more thorough assessment.</p> <p>Conclusion We confirm that upgrades may be required at Maple Lodge STW and / or Blackbirds STW as a result of the development planned in the Core Strategy and beyond. This investment is likely within the period to 2031. Significant upgrades are not required in AMP7, however the longer-term plan for capacity at both STWs will be appraised and developed as details of the proposed scale and phasing of development sites becomes clearer.</p> <p>To obtain this better picture, we will continue to work with and support the Local Planning Authorities as their Local Plans are formalised and adopted.</p> <p>Thames Water continue to monitor incoming flows, their chemical make-up, the PE of the incoming loads, the performance of the plant, the cost of operating the plant and the daily volumetric effluent flows discharged to the river. As such there are many early warning signs available to enable us to react according to the need.</p> <p>Thames Water will continue to work with the Environment Agency to understand what future water quality consents changes may be necessary for Water Framework Directive compliance. These may be in respect of volumetric discharges and / or the final effluent discharge standards e.g. Ammonia, Phosphorous. Should such changes be required these would need to be agreed with the water company via the EA's Water Industry National Environmental Programme (WINEP), to ensure any solutions to meet these consents are deliverable with best available technology and affordable. The WINEP would also establish realistic time-frames to implement the STW improvements (up to 5-years in some cases).</p>	<p>our plant. This is less of an issue at Blackbirds STW, where we could potentially accommodate higher flows by upgrading the site or fully utilising some existing, redundant plant. As highlighted in the WCS however, the site 'already has a tight ammonia consent (1.4 mg/l)', which we would need to design to. It is therefore possible that in future, we may be able to alter the flow split or the volumes treated by the STWs, in order to accommodate growth in future AMPs. This may require significant investment at one or both sites, and discussions with the Environment Agency. We require more detailed growth forecasts from the LPAs, regarding locations, confidence in delivery, and phasing, to complete a more thorough assessment.</p> <ul style="list-style-type: none"> • Conclusion We confirm that upgrades may be required at Maple Lodge STW and / or Blackbirds STW as a result of the development planned in the Core Strategy and beyond. This investment is likely within the period to 2031. Significant upgrades are not required in AMP7, however the longer-term plan for capacity at both STWs will be appraised and developed as details of the proposed scale and phasing of development sites becomes clearer 		
<p>SC_00 017_C halfont St Peter Parish Council</p>	<p>Chalfont St Peter Parish Council</p>	<p>Sites are in flood zones 1 and 2 and will require site specific flood risk assessments to take into account all source of flooding and future climate change impacts and the vulnerability of different land uses to flood risk.</p> <p>Page 56 – 7.38 and 7.39 states that "Three Rivers is an area of serious water stress and it is noted that many existing water mains and sewage systems are increasingly becoming overloaded by successive development"</p> <p>This is an increasing problem in Chalfont St Peter and as The Maple Cross Treatment Works also serves our village as well as Chalfont St Giles and Missenden, all lying on the vulnerable and fragile Misbourne chalk stream. We are concerned that this quantity of new housing will impact severely on its capacity with unintended consequences for Chalfont St Peter.</p> <p>The Interim Sustainability Appraisal Report appendices B.6.2.2. states "Waste water and sewage – Thames Water covers most of Hertfordshire's drainable catchment split into two main catchments, each with a sewage treatment works/waste water treatment works. To the west is Maple Lodge Wastewater Treatment Works located in Rickmansworth. The sewage from Three Rivers all drains to Maple Loge as does the majority of sewage from the neighbouring boroughs of Watford, Dacorum and Welwyn Hatfield and the neighbouring district of St Albans. The capacity of Maple Lodge to accommodate the increase in waste water from development in Three Rivers up to 2031 will be severely constrained by how much growth from the neighbouring local authorities is allocated to the Maple Lodge catchment"</p> <p>This is a worrying situation which could exacerbate the problems Chalfont St Peter is already currently facing with groundwater flooding causing raw sewage to escape the system into the village High Street affecting businesses and residential properties. Ongoing debate for 12 years or so with Thames Water has failed to resolve the problems and is now subject to examination by CWW.</p>	<ul style="list-style-type: none"> • Sites in flood zones 1 and 2 will require site specific flood risk assessments to take into account all source of flooding; • Water stress is an increasing problem in Chalfont; The Maple Cross Treatment Works will severely affect these treatment works and have unintended consequences; • Interim Sustainability Report states that the capacity of Maple Lodge to accommodate increase in wastewater from development up to 2031 will be severely constraints • Worrying situation that could exacerbate problems in Chalfont St Peter with groundwater flooding causing sewage to escape the system into the village High Street • Section B8 water states there are these concerns regarding contamination and flooding 	<p>Noted. Site Specific flood risk assessments are required in Flood Zones 2 and 3.</p> <p>The Infrastructure and Delivery Plan prepared in consultation with the infrastructure providers will identify any shortfalls and new provision requirements. The developer will need to lay sewers and drains to deal with domestic sewerage. Sewerage companies are responsible for the public sewers (usually in roads or public open spaces, but may run through private gardens). The drains which carry household waste are normally the property owner's (or the landlord's) responsibility up until the boundary of the property where they connect to public sewers.</p>	<p>No action</p>

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			Section B8 water states that there are many concerns regarding contamination, flooding, groundwater protection zones and over abstraction. "Water is an essential natural resource. It is important that water resources are protected so that the risk of harm to the environment and to human health can be reduced as far as possibleThe Chiltern's Chalk Streams are particularly susceptible to over abstraction"			
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		NO Croxley Green Parish Council considers that NO residential development should be permitted in flood Zone 3 ANYWHERE In Three Rivers. Despite the sequential test approach, there is no need for further residential development in such areas within Three Rivers. Any development that is permitted in the flood zones should be capable of surviving flooding with minimal damage and designed to provide as much flood detention and retention storage as possible. There should be stronger guidance and control on any development, and particularly front gardens, to keep them as green as possible and ensure there is no surface water run-off from them. We draw attention to the comments in Jed Griffiths' statement and endorse them. In particular, the need to consider surface water flooding, in the context of climate change and the need for natural methods of flood control. The importance of protecting water resources and water quality. The importance of the three rivers and their tributaries as priority habitats and the need to improve their environmental quality by encouraging rewilding. Otherwise, we support the approach in general.	<ul style="list-style-type: none"> NO residential development should be permitted in flood Zone 3 ANYWHERE In Three Rivers. Despite the sequential test approach, there is no need for further residential development in such areas within Three Rivers. In particular, there is a need to consider surface water flooding, in the context of climate change and the need for natural methods of flood control. The importance of protecting water resources and water quality. 	Noted	SFRA study?
SC_00 024_	Abbots Langley Parish Council		Once again, appears woolly and unenforceable. We also need to be stricter and manage the block paving of peoples drives which further pushes un regulated amounts of water onto the street, this is not permitted, but I have yet to see enforcement action taken, the drives are very rarely drained, and permeable paving soon becomes clogged and also fails in heavy rain.	<ul style="list-style-type: none"> Policy appears wholly unenforceable 	Noted.	No action
SC_00 028_C anal & River Trust	Canal & River Trust		The supporting text to the policy is positive in that it highlights the requirement for Flood Risk Assessments for developments located in areas adjacent to the canal to include an assessment of the residual risk, considering the impact of breach, including the effect on safe access and egress, as well as potential for flood risk to increase in the future due to overtopping. It is also positive to note that the policy seeks to ensure that water quality is protected and where possible enhanced. It may be beneficial to include specific reference to canals in the policy itself though to ensure that applicants / developers are aware of the need to consider canals at the earliest opportunity. We also wish to highlight the potential for surface water drainage from sites to the canal. Any surface water discharge to the canal would require prior consent from the Canal & River Trust. Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there was no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right- where they are granted, they will usually be subject to completion of a commercial agreement.	<ul style="list-style-type: none"> Support the policy; Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there was no adverse impact to water quality or structural integrity of the waterway. 	Noted	No action
SC_00 030_Hi ghway s Englan d	Highways England		Highways England is supportive of this policy, but reference should be made to Highways England and the SRN. In relation to drainage and the SRN, it is important to note that no new connections are permitted to Highways England drainage network. In the case of an existing 'permitted' connection, this can only be retained if there is no land use change. Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. Highways England should be contacted to discuss these points in detail as part of, or in advance of a planning application submission.	<ul style="list-style-type: none"> Support the Policy, but make reference to Highways England and Strategic Road Network. Development must not lead to any surface water flooding or SRN carriageway. 	Noted	No action

Q16.Should we have considered alternative options?

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GREEN BELT

Q17. Do you think the Preferred Green Belt is the right approach?

SC_00 017_C halfont St Peter Parish Council	Chalfont St Peter Parish Council		Significantly both communities also enjoy the benefit of Green Belt protection. Chalfont St Peter's Green belt is currently under threat from development in the form of a motorway service area which would lie between the M25 to the South of Maple Cross and the now defunct West Hyde Lane as far as its junction with Denham Lane. That area includes ancient woodlands and hedgerows and risks linking West Hyde with Chalfont St Peter, eradicating essential Green Belt. The Parish Council is deeply opposed to the MSA development and its Response and Supplemental Response to that development identify its Green Belt arguments. It takes a similar view of overdevelopment of green Belt land from Hornhill Road eastwards as far as the A412 North Orbital	<ul style="list-style-type: none"> Chalfont St Peter's Green Belt is currently under threat from a Motorway Service area; Concerned regarding overdevelopment of the Green Belt from Hornhill Road eastwards as far as A412 North Orbital Road. Combined with services will remove a massive amount of Green Belt Land; Area acts as a buffer to stop coalescence with Chalfont St Peter on the boundary with Three Rivers; In May 2019 Three Rivers adopted an emergency climate policy. The Strategic Objective states that you will provide a coherent network of green infrastructure, but do not recognize this coherent network within the sites adjoining Hornhill Road 	Noted. Any development would be required to meet Local Plan policies which seek to address climate change, e.g. by requiring a minimum of 20% less carbon dioxide emissions than Building Regulations requirements, requiring 10% biodiversity net-gain, reducing water consumption etc. Local Plan policies have informed the	Do we have evidence for the 20% emissions target? Biodiversity net gain – HCC are currently working up this policy we should wait so that we have consistency across the Hertfordshire area unless we have evidence to support the 10% biodiversity net gain.
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		<p>Road. Combined with the proposed MSA these developments will remove a massive amount of Green Belt land which (M25 apart) manages to define the leading edge of the London Boroughs and communities inside the M25 from the open fields of the Chiltern Hills.</p> <p>These areas act as a buffer to stop coalescence with Chalfont St Peter on its boundary with Three Rivers. They also act to separate Hertfordshire from Buckinghamshire.</p> <p>Quote preferred policy option 16 (2) “there is a general presumption against inappropriate development that would not preserve the openness of the green belt or which would conflict with the purposes of including land within it”</p> <p>In May 2019 Three Rivers adopted an emergency Climate Change Policy in which it is said “as part of this, the Council has committed to use all practical means to reduce the impact of Council services on the environment, to cut carbon emissions and to reduce impacts on the environment (2.34)”</p> <p>Your Strategic Objective says that you will provide a coherent network of green infrastructure. We do not recognize this coherent network within the sites adjoining Hornhill Road as west east traffic will feed from the M25, crossing into dense housing developments on both sides of the road.</p> <p>We consider the impacts of these developments, or even parts of them, on the environment raises huge concerns for the future of the countryside and open landscapes and will lead to the coalescence of adjoining villages and Counties.</p>	<p>as west east traffic will feed from the M25, crossing into dense housing developments;</p> <ul style="list-style-type: none"> Consider that the impacts of the developments on the environment raises huge concerns for future of the Countryside 	TRDC Climate Emergency & Sustainability Strategy.	
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council	<p>The Green Belt within Croxley Green and in the surrounding areas is one of the key features of the settlement and highly valued by most residents. The whole point of the Green Belt is that it is intended to be an enduring feature. Otherwise, the whole character of a place like Croxley Green will be totally changed. Croxley Green Parish Council endorses the comments from Jed Griffiths’ statement about not reiterating, and thereby slightly altering, the policies set out in the NPPF. We suggest TRDC should stick to the clear policies in the NPPF and not change the designation of any land within the Green Belt, except in extreme cases or where slight amendment of the boundaries is locally acceptable and does not damage the integrity of the Green Belt. In addition, we suggest there should be a presumption in favour of only using temporary buildings to meet any agricultural or forestry needs and a requirement to demolish and remove any such buildings or structures when the original purpose expires. There should be a prohibition on converting such buildings to residential use with a legally enforceable covenant as well as conditions attached to any planning permission.</p>	<ul style="list-style-type: none"> TRDC should not change the designation of any land within the Green Belt, except in extreme cases or where slight amendment of the boundaries is locally acceptable and does not damage the integrity of the Green Belt. In addition, there should be a presumption in favour of only using temporary buildings to meet any agricultural or forestry needs and a requirement to demolish and remove any such buildings or structures when the original purpose expires. There should be a prohibition on converting such buildings to residential use with a legally enforceable covenant as well as conditions attached to any planning permission. 	Noted. TRDC does not have sufficient available land to meet its housing needs over the plan period and as such has undertaken call for sites exercises and Strategic Housing and Employment Land (SHELA) capacity studies to identify additional sources of land to meet housing needs over the plan period. 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”.	No action
SC_00 024_A bbots Langle y Parish Council	Abbots Langley Parish Council	<p>The first three pages of this document and the general dismay of the loss of the greenbelt demonstrates that this policy is redundant to all but residents who wish to enlarge their home. ‘DO AS I SAY, NOT AS I DO’.</p>	<ul style="list-style-type: none"> Unclear 	Noted	No action
SC_00 026_H CC Growth and Infrastr ucture	HCC Growth and Infrastructure	<p>Green Belt</p> <p>Waste Management Unit. The existing waste transfer station and recycling centre at Waterdale, located between the M1 and A405 (Watford Road) is a strategic waste management facility, located within the Green Belt. The facility is also essential to the waste collection and bulking of the district’s municipal waste including the processing of recyclables. The site is also shown as an existing waste allocation on the district council’s adopted policies map. Waterdale is an important facility handling around 60 percent of Hertfordshire’s residual waste and in 2019/20 alone it received nearly 160,000 tonnes of waste rubbish and recycling. The county council has recently purchased the former bus depot, on land immediately south of the site, for the potential expansion of the waste management facilities that currently operate from the Waterdale site (further comments in relation to this are outlined within section 12 of this representation).</p>	<ul style="list-style-type: none"> As Waterdale is a developed site, it is considered that it does not meet the five purposes of the Green Belt, as stated within the NPPF. The construction of new buildings in the Green Belt is inappropriate development and is also contrary to the NPPF. The county council therefore requests that the Waterdale site be excluded from the Green Belt, prior to the publication of the forthcoming consultation on the Regulation 19 local plan and that the Green Belt boundary is amended to exclude this site on the accompanying policies map. It is further noted that the district council may potentially allocate an additional housing allocation to the south of Waterdale (CFS65: Land North of Bucknalls Lane, Garston). it is considered that the amended Green Belt boundary, through the potential removal of this housing allocation from the Green Belt, could therefore be extended north to exclude the Waterdale waste transfer station and recycling centre, 	<p>Noted. Green belt releases can only be undertaken through a local plan review. 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”.</p> <p>We have carried forward a new policy on major developed sites in the green belt.</p>	<p>Assess Waterdale against the GB assessment to determine whether it should be released from the green belt.</p> <p>Is waterdale classified as a major developed site?</p>

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			As Waterdale is a developed site, it is considered that it does not meet the five purposes of the Green Belt, as stated within the NPPF. The construction of new buildings in the Green Belt is inappropriate development and is also contrary to the NPPF. The county council therefore requests that the Waterdale site be excluded from the Green Belt, prior to the publication of the forthcoming consultation on the Regulation 19 local plan and that the Green Belt boundary is amended to exclude this site on the accompanying policies map. It is further noted that the district council may potentially allocate an additional housing allocation to the south of Waterdale (CFS65: Land North of Bucknalls Lane, Garston). Whilst the county council has made separate comments on this potential allocation within section 12 of this representation, it is considered that the amended Green Belt boundary, through the potential removal of this housing allocation from the Green Belt, could therefore be extended north to exclude the Waterdale waste transfer station and recycling centre, along with the former bus depot which will be incorporated into the Waterdale site.	along with the former bus depot which will be incorporated into the Waterdale site.		
SC_00 028_C anal & River Trust	Canal & River Trust		<p>With any development close to the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc. It is important to ensure that developments do not adversely affect the stability of the canal infrastructure, such as cutting and embankment slopes, as this could significantly increase the risk of damage to the canal. It is therefore encouraging to note that land stability is specifically referenced in the policy. The need for developments adjacent to the canal corridor to consider any potential impacts to land stability could be referenced within the supporting text or a specific canal related policy.</p> <p>The canals generally retain a tranquil and quiet character and even in urban areas can provide relief from noisy activities or urban influences. It is therefore important to ensure that any development proposed adjacent to the canal considers the potential impacts on users of the canal and its biodiversity value. Noise and Air Quality Assessments should be required to consider the canal corridor and its users as sensitive receptors with developments also required to provide any necessary mitigation.</p> <p>With regards to lighting, the Trust advises that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the site, and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species.</p>	<ul style="list-style-type: none"> • Potential for adverse impacts on infrastructure of canal, ensure developments near the canal do not adversely affect the Council; • Noise and Air Quality Assessments should be required to consider the canal corridor; • Lighting – Any external lighting should be angled downwards and should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species 	<p>Noted. Development proposals near a canal will be expected to ensure there is no adverse impact on the canal.</p> <p>Draft policies in the Local Plan set out the requirements in relation to pollution (air, noise, light etc.) that development proposals will have to consider as part of their developments.</p>	No action

Q17.Should we have considered alternative options?

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GROUND CONDITIONS CONTAMINATION AND POLLUTION

Q18. Do you think the Preferred Ground Conditions, Contamination and Pollution is the right approach?

SC_P1 _Sport Englan d	Sport England	No	<p>It is requested that section 8 of the policy option on lighting is amended. The policy does not provide policy guidance on light sensitive developments proposed in locations where nearby existing land uses may have an adverse effect on the occupants of the development. For example, residential schemes proposed adjoining school or sports clubs sites that have floodlit sports facilities. In such scenarios, developments should submit lighting assessments including mitigation measures to address any identified impacts to help avoid residential amenity issues arising which may result in the uses that generate an impact being prejudiced.</p> <p>Sport England has had experience of sites with established floodlit community sports facilities coming under pressure to reduce the hours of use that the floodlighting operates in response to complaints</p>	<ul style="list-style-type: none"> • Section 8- Policy does not provide guidance on where new development proposals might be subject to an adverse effect from existing developments such as existing sports facilities with flood lights. Sport England has had experience of sites with established floodlit community sports facilities coming under pressure to reduce the hours of use that the floodlighting operates in response to complaints from residents in new developments where there was inadequate consideration of the lighting impact issue. 	<ul style="list-style-type: none"> • Agreed. Paragraph 186 of the NPPF states 'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.' 	<p>Additional wording to be added to policy justification:</p> <p>Under the agent of change principle, if new development or uses are to be introduced near a pre-existing business, such as a live music venue, or sports facility it is the responsibility of the developer to ensure solutions to address and mitigate noise and/or light are put forward as part of proposals.</p>
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			from residents in new developments where there was inadequate consideration of the lighting impact issue. The inclusion of such policy guidance would help avoid such a scenario. It would also be consistent with the approach taken to noise sensitive development in section 5(c) of this policy.	<ul style="list-style-type: none"> It would also be consistent with the approach taken to noise sensitive development in section 5(c) of this policy. 		
SC_00 024_A Abbots Langley Parish Council	Abbots Langley Parish Council	Yes	Agree	<ul style="list-style-type: none"> support 	Noted	No action
SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure		Preferred Policy Option 17, Ground Conditions, Contamination and Pollution. It is suggested that the following additional text is added to the list of criteria under paragraph (8): g) Light pollution will be minimised by following the latest guidance ² of the Institute of Lighting Professionals h) Appropriate technologies will be used to minimise the energy usage required and carbon generated. This may include the energy source, bulb, daylight or movement sensors, or timers.	Suggested additional text be included in the list of criteria under paragraph 8.	Agreed. Paragraph 186 of the NPPF states 'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'	Additional wording to be added to policy justification: Under the agent of change principle, if new development or uses are to be introduced near a pre-existing business, such as a live music venue, or sports facility it is the responsibility of the developer to ensure solutions to address and mitigate noise and/or light are put forward as part of proposals.
SC_00 030_H Highway England	Highways England		This policy relates to ground conditions, lighting, noise and vibration. This policy does not currently refer to the SRN, but is required for those sites that run up to or close to the SRN boundary. For sites positioned site close to the SRN carriageway and junctions, it will be necessary to ensure that the proposals mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts. In terms of noise, we would expect the site masterplan to be designed to minimise the exposure of noise-sensitive receptors to strategic traffic, using either or a combination of a landscape buffer and acoustic bund designed to shield the settlement from motorway noise. In addition to noise impacts, we would also draw attention to the importance of ensuring that drainage, landscaping, lighting and boundary treatment proposals for the proposals in accordance with the DfT Circular 02/2013 Annex A A1, which states that all noise fences, screening and other structures must be erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land. We would expect that these issues are considered when finalising the site layout and masterplan proposals. Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed and reported.	Noted.	Paragraph 186 of the NPPF states 'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'	Additional wording to be added to policy justification: Under the agent of change principle, if new development or uses are to be introduced near a pre-existing business, such as a live music venue, or sports facility it is the responsibility of the developer to ensure solutions to address and mitigate noise and/or light are put forward as part of proposals.

Q18. Should we have considered alternative options?

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WASTE MANAGEMENT AND RECYCLING

Q19. Do you think the Preferred Waste Management and Recycling is the right approach?

SC_00 023_C Croxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council considers the policy should be extended to reduce waste and encourage recycling. In particular, there should be a requirement on all commercial development to commit to phasing out single use, non-compostable materials, and to providing recycling facilities for their customers for all of their products and packaging. Also a significant amount of demolition and construction waste arises from domestic extensions and adaptations. The policy should be extended to require the pre-sorting and recycling of such waste to minimise the amount going to landfill and the contamination of waste streams for reuse and recycling. Otherwise we support the approach in general.	The policy should be extended to reduce waste and encourage recycling and be extended to require the pre-sorting and recycling of such waste to minimise the amount going to landfill and the contamination of waste streams for reuse and recycling.	Noted	No action
SC_00 024_A Abbots Langley Parish Council	Abbots Langley Parish Council		Waste management in the district is good, could be improved by household education regarding what is and is not recyclable.	Support	Noted	No action

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SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure	<p>Preferred Policy Option 18, Waste Management and Recycling. It is noted that the wording in Part 2 c) and then in paragraph 9.16 (bullet point 4) should refer to Modern Methods of Construction (MMC). Given the emphasis that the government puts on MMC and the wish of the Growth Board to stimulate this delivery method, it may be appropriate to include a specific section explaining what it is in the Sustainability Policy commentary. HCC could assist in providing some draft wording, if the district council considers such a section should be included.</p> <p>Minerals and Waste Planning. The county council supports the inclusion of this policy, although it is suggested that the following amendments are made to paragraph (2) e):</p> <p>e) Applying a Site Waste Management Plan for relevant projects. This could require a Site Waste Management Plan or a Circular Economy Statement and could refer to the emerging Circular Economy Guidance document</p> <p>Waste Management Unit. The first paragraph of this policy appears to focus primarily on the district council's function as Waste Collection Authority. When considering the overall waste management services for the district and the wider Hertfordshire area, it is critical that the county council's statutory function as waste disposal authority is also acknowledged within this policy. With regard to paragraph (1) b) and the provision of waste and recycling facilities, the county council requires all new waste facilities to be designed to modern standards. For example, enclosed operations and employing odour, noise and/or dust suppression as may be appropriate for the material being received and treated. Therefore, it is recommended that the policy should be amended to allow some degree of adverse impact(s) where these can be reasonably mitigated. Detailed siting, design and operational arrangements for a waste facility, as well as mitigation measures for any adverse impact that may be generated by new developments will need to be consulted and where necessary, agreed by HCC.</p> <p>Waste Management and Recycling (Paragraphs 9.10 and 9.11) Minerals and Waste Planning. It is requested that the plan signposts the adopted Waste Core Strategy & Development Management Policies DPD, in order to provide a clear reference to the Waste Local Plan forming part of the Development Plan for the district.</p> <p>Waste Policy 12: Sustainable Design, Construction and Demolition of requires all relevant construction projects to be supported by a Site Waste Management Plan (SWMP). This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Reference to this could be included.</p> <p>Minerals and Waste Planning. HCC supports the inclusion of this policy which sets a requirement for major developments to submit a Sustainability Statement. Part (3) a) of the policy option could refer specifically to opportunistic extraction of minerals for use on site, prior to non-mineral development. Opportunistic extraction refers to cases where preparation of the site for built development may result in the extraction of suitable material that could be processed and used on site as part of the development. This would be in-line with adopted Minerals Local Plan Policy 5: Mineral Sterilisation and Policy 8: Mineral Safeguarding, of the Proposed Submission document which encourages the prior extraction of sand and gravel on site in construction projects, in order to reduce the need to import material.</p> <p>The county council is currently in the process of reviewing the adopted Waste Local Plan. The current draft version contains the following policy (Strategic Policy 15: Sustainable Design and Resource Efficiency), which proposes that all new development proposals are to be supported by a Circular Economy Statement. Should this policy be included within the new Waste Local Plan once it is adopted, it would replace the existing policy requirement for a Site Waste Management Plan (SWMP) and references will therefore need to be included in the later iteration of the district council's local plan. The county council supports the direction of this policy, however there are serious concerns about the wording as being too prescriptive on the inputs without being comprehensive. HCC suggests the following wording to be used as part of the policies which is a process approach requiring the developer to do the necessary assessments and show how risks are tackled through a series of levels.</p>	<ul style="list-style-type: none"> Waste management and recycling. It is noted that the wording in Part 2 c) and then in paragraph 9.16 (bullet point 4) should refer to Modern Methods of Construction (MMC). It may be appropriate to include a specific section explaining what it is in the Sustainability Policy commentary. The county council supports the inclusion of this policy, although it is suggested that the following amendments are made to paragraph (2) e) It is critical that the county council's statutory function as waste disposal authority is also acknowledged within this policy. With regard to paragraph (1) b) and the provision of waste and recycling facilities, the county council requires all new waste facilities to be designed to modern standards. It is recommended that the policy should be amended to allow some degree of adverse impact(s) where these can be reasonably mitigated. Paras 9.10 and 9.11- It is requested that the plan signposts the adopted Waste Core Strategy & Development Management Policies DPD, in order to provide a clear reference to the Waste Local Plan forming part of the Development Plan for the district. Include reference to a Site Waste Management Plan (SWMP). <p>Minerals</p> <ul style="list-style-type: none"> Support. Part (3) a) of the policy option could refer specifically to opportunistic extraction of minerals for use on site, prior to non-mineral development. The current draft version contains the following policy (Strategic Policy 15: Sustainable Design and Resource Efficiency), which proposes that all new development proposals are to be supported by a Circular Economy Statement. Should this policy be included within the new Waste Local Plan once it is adopted, it would replace the existing policy requirement for a Site Waste Management Plan (SWMP) and references will therefore need to be included in the later iteration of the district council's local plan. The county council supports the direction of this policy, however there are serious concerns about the wording as being too prescriptive on the inputs without being comprehensive. HCC suggests wording to be used. 	<p>Agreed.</p>	<ul style="list-style-type: none"> Wording in Part 2 c) and then in paragraph 9.16 (bullet point 4) should refer to Modern Methods of Construction (MMC). Include a specific section explaining what it is in the Sustainability Policy commentary. Amendments to be made to paragraph (2) e): <p>e) Applying a Site Waste Management Plan for relevant projects. This could require a Site Waste Management Plan or a Circular Economy Statement and could refer to the emerging Circular Economy Guidance document</p> <ul style="list-style-type: none"> Waste Management and Recycling (Paragraphs 9.10 and 9.11) signpost the adopted Waste Core Strategy & Development Management Policies DPD, in order to provide a clear reference to the Waste Local Plan forming part of the Development Plan for the district. Waste Policy 12: Include reference to a Site Waste Management Plan (SWMP). <p>Minerals</p> <ul style="list-style-type: none"> Part (3) a) of the policy option could refer specifically to opportunistic extraction of minerals for use on site, prior to non-mineral development. HCC suggests the following amended wording setting out a process approach requiring the developer to do the necessary assessments and show how risks are tackled through a series of levels.
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Q19. Should we have considered alternative options?

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GREEN AND BLUE INFRASTRUCTURE NETWORK

Q20. Do you think the Preferred Green and Blue Infrastructure Network is the right approach?						
SC_P1_Sport England	Sport England	Yes	The preferred policy option for Green and Blue Infrastructure is supported as it supports a net gain in the quality and quantity of Green and Blue Infrastructure which would include spaces suitable for sport and physical activity. The proposals in parts 4 and 5 of the policy to improve connectivity between key assets in the Green Infrastructure network and to protect/enhance public rights of way are particularly supported as this would help safeguard and improve opportunities for physical activity. This policy would accord with Government policy in paragraphs 91 and 97 of the NPPF in this respect.	<ul style="list-style-type: none"> Supports policy as it supports a net gain in the quality and quantity of Green and Blue Infrastructure which would include spaces suitable for sport and physical activity. The proposals in parts 4 and 5 of the policy to improve connectivity between key assets in the Green Infrastructure network and to protect/enhance public rights of way are particularly supported as this would help safeguard and improve opportunities for physical activity. This policy would accord with Government policy in paragraphs 91 and 97 of the NPPF in this respect. 	Noted	No action
SC_00_023_Croxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council considers there should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity. We endorse the comments from Jed Griffiths' statement about the importance of the local chalk streams; the need to define "key assets"; the importance for preserving and enhancing connectivity between sites; and the need for wide buffer zones. Otherwise we support the approach in general.	<ul style="list-style-type: none"> There should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity 	Noted.	Need to check if we can rely on Herts Green and Blue Strategy or whether we need to undertake a GI plan.
SC_00_024_Abbots Langley Parish Council	Abbots Langley Parish Council		This also relates to item 12, the amount of green and blue infrastructure needs to be enforced with all new development both on the site and on the borders, new site should also have to provide funding to the greening of interconnected spaces.	<ul style="list-style-type: none"> Noted. 	Noted.	Need to check if we can rely on Herts Green and Blue Strategy or whether we need to undertake a GI plan.
SC_00_026_HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Preferred Policy Option 19, Green and Blue Infrastructure.</p> <p>The county council supports the direction and intent of this policy but have a few concerns regarding insufficient land allocation to ensure that the infrastructure is managed and maintained, and therefore the following additions have been proposed: It is suggested that the wording within paragraph 1) is also amended as follows:</p> <p>1) <u>The Council will seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces.</u> <u>a. Where land is provided or identified for Green and Blue Infrastructure purposes as part of a development proposal, applicants will be required to provide appropriate land management and maintenance plans.</u> <u>b. Stewardship plans and funding arrangements will also be required on major developments or ecologically sensitive sites."</u></p> <p>The district council should note that the Local Biodiversity Action Plan will shortly be updated and replaced by the Local Nature Recovery Strategy required under the Environment Bill. HCC also suggests referencing the Herts Green and Blue Infrastructure Strategy which is currently being prepared by the Spatial Planning team. The following updates are recommended in accordance to the suggested referencing.</p>	<ul style="list-style-type: none"> Supports policy and has proposed some additional wording to address concerns regarding insufficient land allocation to ensure that the infrastructure is managed and maintained (paragraph 1) HCC suggests referencing the Herts Green and Blue Infrastructure Strategy. HCC also recommends suggested wording in the supporting text (paragraph 2 d) and supporting text. Paragraph 10.0 -Amend definition of Green Infrastructure (GI). There is however concern with regard to the lack of reference to any evidence to underpin the strategic planning and delivery of GI within the district and its wider context, in line with NPPF paragraph 25, which confirms that 	<ul style="list-style-type: none"> Agreed amendments to wording. TRDC is undertaking evidence updates within which new GI strategy will be considered 	<p>Suggested wording within paragraph 1) <u>The Council will seek a net gain in the quality and quantity of Green and Blue Infrastructure, through the protection and enhancement of assets and the provision of new green spaces.</u> <u>a. Where land is provided or identified for Green and Blue Infrastructure purposes as part of a development proposal, applicants will be required to provide appropriate land management and maintenance plans.</u> <u>b. Stewardship plans and funding arrangements will also be required on major developments or ecologically sensitive sites."</u></p>

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	<p>2) Priorities for Green and Blue Infrastructure focus on conserving and enhancing the following key assets and the linkages between them: ... d) the District's Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, key biodiversity habitats, species and areas identified in the Hertfordshire Biodiversity Action Plan and Local Nature Recovery Strategy and heritage assets and landscape character within areas of Green Infrastructure. 7). The approach to Green Infrastructure will be consistent with the revised Hertfordshire Green Infrastructure Strategy.</p> <p>HCC would also recommend including the following in the supporting text: <u>"Green and Blue infrastructure enables natural flood control, and also to stress that enhancement of biodiversity requires land management and connectivity between sites. We have not seen reference to the importance of the rural economy and farming / grazing practices to maintain priority habitats and would like to see this mentioned in the commentary. It links to Biodiversity Net Gain as this requires a 30 year management strategy."</u></p> <p>The Landscape Institute³ confirms that GI functions are the roles that assets play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystem services.' It is important to acknowledge functions that deliver a range of health and wellbeing benefits. With regard to paragraph 2), the priorities are supported in principle; however, they are very high level and there may be areas between them that are equally important, for example in supporting the function of natural systems. This could be evidenced within a district level GI strategy as discussed above. It is suggested that the wording within paragraph 2) d) is amended as follows:</p> <p><u>d) the District's Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, key biodiversity habitats, species and areas identified in the Hertfordshire Biodiversity Action Plan¹⁵, Local Nature Recovery Strategies and heritage assets and landscape character within areas of Green Infrastructure.</u></p> <p>With regard to paragraph 3), it should be noted that not all GI is, or should be, accessible. Avoiding conflict between people and sensitive habits and wildlife, is critical in the planning and management of GI, and there needs to be balance of provision for to meet the needs of people or wildlife, or both. It is suggested that there could be a greater distinction between the provision of strategic GI networks and public open space and recreation networks – that should complement each other. At a site (planning application) level, it is understood that open space requirements are informed by objectively assessed needs. In relation to GI, it is suggested that agreed GI principles should be embedded within design guides and codes/development briefs or similar mechanisms. Given the progress of the Environment Bill, we advise it should now refer to Local Nature Recovery Strategies which will be a requirement of the Environment Act. The policy should ideally refer to the National Design Guide and a requirement for the preparation and agreement of Design Codes for major developments which are in or affect designated or sensitive rural and urban fringe landscapes.</p> <p>Appropriate technologies will be used to minimise the energy usage required and carbon generated. This may include the energy source, bulb, daylight or movement sensors, or timers. The definition in the NPPF of Green Infrastructure (GI) has been updated in July 2021 and the text within paragraph 10.0 should be amended as follows:</p> <p><u>"Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity."</u> The overall policy intention to conserve and enhance green and blue infrastructure (GI), is fully supported.</p> <p>Paragraph 10.6 It is considered that the wording in this paragraph should be amended as follows: <u>"Public Rights of Way of provide valuable footpath, cycle and bridleway routes within the urban area and out into the countryside. During the 2020 /21 coronavirus pandemic the value of Rights of Way became even more important have been prevalent, providing an extensive network for to access and recreation within the countryside..."</u></p> <p>There is however concern with regard to the lack of reference to any evidence to underpin the strategic planning and delivery of GI within the district and its wider context, in line with NPPF paragraph 25, which confirms that authorities should collaborate to identify the relevant strategic matters (such as GI) which they need to address in their plans. The 'Hertfordshire Strategic Green Infrastructure Plan (Incorporating Green Arc area), Land Use Consultants, March 2011' provides an overview of the proposed GI network at a County level. This document is currently under review with renewed emphasis on strategy, delivery an implementation, commissioned by Hertfordshire Infrastructure Planning Partnership (HIPP), and provides the framework within which more local strategies should sit. There is no reference to a district level GI strategy within the policy or listed within the local plan evidence base. It is suggested that a district level strategy is critical to identify opportunities for the enhancement and creation of GI, especially where it can be given planning weight and endorsed as a material consideration in the planning process, and it can be embedded in</p>	<p>authorities should collaborate to identify the relevant strategic matters (such as GI) which they need to address in their plans.</p> <ul style="list-style-type: none"> • There is no reference to a district level GI strategy within the policy or listed within the local plan evidence base. It is suggested that a district level strategy is critical to identify opportunities for the enhancement and creation of GI, especially where it can be given planning weight and endorsed as a material consideration in the planning process, and it can be embedded in the infrastructure delivery Plan, in line with NPPF paragraph 34, which states that plans should set out contributions expected from development to deliver green infrastructure. • Supports the provision of sustainable design and the requirement for development proposals to take opportunities to reduce waste within paragraph 17. 		<ul style="list-style-type: none"> • suggested wording within paragraph 2) d) <p><u>d) the District's Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, key biodiversity habitats, species and areas identified in the Hertfordshire Biodiversity Action Plan¹⁵, Local Nature Recovery Strategies and heritage assets and landscape character within areas of Green Infrastructure.</u></p> <p>Supporting text: <u>"Green and Blue infrastructure enables natural flood control, and also to stress that enhancement of biodiversity requires land management and connectivity between sites. We have not seen reference to the importance of the rural economy and farming / grazing practices to maintain priority habitats and would like to see this mentioned in the commentary. It links to Biodiversity Net Gain as this requires a 30 year management strategy."</u></p> <p>Need to undertake a GI Study. Paragraph 10.0 -Amend definition of Green Infrastructure (GI).</p> <p><u>Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity."</u> The overall policy intention to conserve and enhance green and blue infrastructure (GI), is fully supported.</p> <p>Paragraph 10.6 It is considered that the wording in this paragraph should be amended as follows: <u>"Public Rights of Way of provide valuable footpath, cycle and bridleway routes within the urban area and out into the countryside. During the 2020 /21 coronavirus pandemic the value of Rights of Way became even more important have been prevalent, providing an extensive network for to access and recreation within the countryside..."</u></p>
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			the infrastructure delivery Plan, in line with NPPF paragraph 34, which states that plans should set out contributions expected from development to deliver green infrastructure. A strategy would provide planning officers with an important tool and robust justification for the provision of GI in negotiations with developers. It can also inform masterplans, design guides and codes, under the recent and emerging planning reforms. The county council supports the provision of sustainable design and the requirement for development proposals to take opportunities to reduce waste within paragraph 17.			
SC_00028_Canal & River Trust	Canal & River Trust		The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The importance of canals as green infrastructure is well recognised, and Paragraph 175 of the National Planning Policy Framework is clear that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure should be undertaken. It is therefore encouraging to note that the canal corridor is acknowledged as a key green and blue infrastructure asset within the Local Plan area and overall, the policies are positive and supportive. The requirement for surveys to be conducted along the GU to identify water vole and other important wildlife habitat could be included as a priority. In addition, the Council should consider the development and enhancement of floating habitat and other habitat enhancement projects.	<ul style="list-style-type: none"> Requirement for surveys to be conducted along the GU to identify water vole and other important wildlife habitat could be included as a priority. The Council should consider the development and enhancement of floating habitat and other habitat enhancement projects 	Noted	Consider sufficiency of Herts Green and Blue Strategy or whether we need to undertake a GI plan.

Q20. Should we have considered alternative options?						
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LANDSCAPE CHARACTER

Q21. Do you think the Preferred Landscape Character is the right approach?						
SC_00002_Historic England	Historic England	Yes	Landscape Character We welcome the inclusion of this policy and the requirement for landscape enhancement. It is recommended however that the policy be expanded to refer to the role the historic environment has to play in understanding the landscape. Many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence of how the landscape has evolved over time. The objective of protecting and enhancing the landscape and recognition of its links to cultural heritage can help improve how the historic environment is experienced and enjoyed.	<ul style="list-style-type: none"> Welcome the inclusion of the policy Suggest policy expanded to refer to the role historic environment has to play in understanding the landscape 	Noted. Policy requires landscape assessment which is considered to cover this.	No action
SC_00009_Sarratt Parish Council	Sarratt Parish Council		We strongly support the introduction of a presumption against development in the Chilterns Area of Outstanding Natural Beauty (AONB).	<ul style="list-style-type: none"> We strongly support the introduction of a presumption against development in the Chilterns Area of Outstanding Natural Beauty (AONB). 	Noted.	No Action
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council considers there should be reference to the importance of local landscapes and explicit support of local landscape characteristics identified in Neighbourhood Plans. Otherwise we support the approach in general.	<ul style="list-style-type: none"> Support general approach There should be reference to the importance of local landscapes and explicit support of local landscape characteristics identified in Neighbourhood Plans. 	Noted.	No action
SC_00024_Abbots Langley Parish Council	Abbots Langley Parish Council		Agree	<ul style="list-style-type: none"> agree 	Noted.	No action
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure		Preferred Policy Option 20, Landscape Character. With regard to paragraph 1), it is considered that the Chilterns Area of Outstanding Natural Beauty (AONB) does not sit comfortably within this policy theme. It is suggested that it may be better placed in a policy focused on 'landscape value' in line with NPPF paragraph 174 which states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes...in a manner commensurate with their statutory status or identified quality in the development plan.	<ul style="list-style-type: none"> Paragraph 1- it is considered that the Chilterns Area of Outstanding Natural Beauty (AONB) does not sit comfortably within this policy theme. It is suggested that it may be better placed in a policy focused on 'landscape value' in line with NPPF paragraph 174 Paragraph 2) references Landscape Regions and it should be noted that 'A Landscape Strategy for Hertfordshire Volume 1, has since been superseded. The level of assessment used should be proportionate to the scale of the proposed change, 	<ul style="list-style-type: none"> Paragraph 1- disagree. AONB is about the distinctive, attractive and varied landscapes so fits within this policy. Remove reference to Landscape Regions, which has been superseded. Noted, paragraph 10.11 will be amended to provide further clarity to 	<p>Consider evidence base sufficiency</p> <p>Heritage assessment</p> <p>Townscape character assessments- conservation character appraisals?</p> <p>Hertfordshire Landscape Character Assessment to be updated?</p>

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	<p>Paragraph 2) references Landscape Regions and it should be noted that 'A Landscape Strategy for Hertfordshire Volume 1: Background Information' which was produced in 1997, has since been superseded.</p> <p>A series of landscape character assessments have been produced at a national, regional and local level.</p> <ul style="list-style-type: none"> Natural England, National Character Areas (NCAs) 2014: https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-the-east-of-england East of England Landscape Typology, Landscape East (2011), Identifies regional landscape types: http://landscape-east.org.uk/ Hertfordshire Landscape Character Assessment, The Landscape Partnership, October 2001: Landscape Character Assessment Hertfordshire County Council. <p>The level of assessment used should be proportionate to the scale of the proposed change, for example, for the purposes of large-scale strategic plan making it may be more appropriate to refer to the national level assessment, and for the purposes of assessing site allocations and other planning applications, it is considered that the local level assessment is most appropriate. The local level assessment identifies local landscape character areas and provides a description and assessment of landscape character, an evaluation of landscape condition and robustness, and a strategy and guidelines for managing change. It is advised that (where relevant), development proposals should be required to demonstrate how they comply with the strategy and guidelines for change. Landscape character assessment are also a critical evidence base underpinning the development of design codes, and the designation of Local Green Space. It is unclear whether the district has any townscape character assessments. If so, the policy could be extended to encompass 'landscape and townscape character.'</p> <p>It is unclear whether "landscape regions" in part (2) of the policy means National Character Areas, HCC landscape regions or local Landscape Character Areas. The LCAs are much more refined and descriptive of local landscape distinctiveness and in themselves are not of a regional scale.</p> <p>Paragraph 3 The policy should ideally refer to the National Design Guide and a requirement for the preparation and agreement of Design Codes for major developments which are in or affect designated or sensitive rural and urban fringe landscapes.</p> <p>Paragraph 10.8 The supporting text prior to Preferred Policy Option 20, does not mention the important topography; therefore, it is proposed to amend the text as follows: <u>"The landscape of Three Rivers is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other land forms set within the dip slope and river valleys of the Chilterns, North Thames basin and Thames Valley..."</u></p> <p>Paragraph 10.9 It is considered that the text within paragraph 10.9 should also be amended as follows: <u>"The parts of the AONB within the District consist largely of chalk stream river valley and adjacent hillsides and woods and dip-slope woods and pastures."</u></p> <p>Paragraph 10.11 The approach to protecting and enhancing valued landscapes outside national designations is not clear. This is critical, as it can provide the only line of defence for some locally important landscape areas against negative change. This includes local landscape designations, such as Local Green Space Designations (NPPF paragraph 101). The NPPF also provides a strong reason for restricting the overall scale, type or distribution of development in the plan area' (NPPF paragraph 8).</p> <p>The range of factors that can be considered when identifying landscape value are set out in industry best practice guidance 'Guidelines for Landscape and Visual Impact Assessment Third edition, Landscape Institute and Institute of Environmental management and Assessment' (GLVIA3), and within the recently published 'Technical Guidance Note 02/21 Assessing landscape value outside national designations, Landscape Institute'</p>	<p>for example, for the purposes of large-scale strategic plan making it may be more appropriate to refer to the national level assessment, and for the purposes of assessing site allocations and other planning applications, it is considered that the local level assessment is most appropriate. Paragraph 10.11- The approach to protecting and enhancing valued landscapes outside national designations is not clear. It is advised that (where relevant), development proposals should be required to demonstrate how they comply with the strategy and guidelines for change. Landscape character assessment are also a critical evidence base underpinning the development of design codes, and the designation of Local Green Space.</p> <ul style="list-style-type: none"> It is unclear whether the district has any townscape character assessments. If so, the policy could be extended to encompass 'landscape and townscape character.' It is unclear whether "landscape regions" in part (2) of the policy means National Character Areas, HCC landscape regions or local Landscape Character Areas. Paragraph 3 -The policy should ideally refer to the National Design Guide and a requirement for the preparation and agreement of Design Codes for major developments which are in or affect designated or sensitive rural and urban fringe landscapes. Paragraph 10.8 The supporting text prior to Preferred Policy Option 20, does not mention the important topography; therefore, it is proposed to the policy to amend the text as follows: <u>"The landscape of Three Rivers is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other land forms set within the dip slope and river valleys of the Chilterns, North Thames basin and Thames Valley..."</u> Paragraph 10.9- It is considered that the text within paragraph 10.9 should also be amended as follows: <u>"The parts of the AONB within the District consist largely of chalk stream river valley and adjacent hillsides and woods and dip-slope woods and pastures."</u> It is suggested that the current Hertfordshire Landscape Character Assessment may benefit from updating in this respect (as an extension to existing LCA or as an add-on study). 	<p>demonstrate how development proposals will comply with strategy and guidelines for change.</p> <ul style="list-style-type: none"> DO we have townscape assessments? Noted. Part 2 will be amended accordingly. Paragraph 3 will make reference to National Design Guide Agree amendments to Paragraph 10.6, 10.8 and 10.9 to provide greater context. Noted, the need to update evidence as an add-on study to the Herts Landscape Character Assessment. 	<p>Does Policy require a Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA)? Need to be clear.</p> <p>Paragraph 10.6 wording in this paragraph should be amended as follows: <u>"Public Rights of Way of provide valuable footpath, cycle and bridleway routes within the urban area and out into the countryside. During the 2020 /21 coronavirus pandemic the value of Rights of Way became even more important have been prevalent, providing an extensive network for to access and recreation within the countryside..."</u></p> <p>Paragraph 10.8 proposed to amend the text as follows: <u>"The landscape of Three Rivers is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other land forms set within the dip slope and river valleys of the Chilterns, North Thames basin and Thames Valley..."</u></p> <p>Paragraph 10.9 be amended as follows: <u>"The parts of the AONB within the District consist largely of chalk stream river valley and adjacent hillsides and woods and dip-slope woods and pastures."</u></p>
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			<p>https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstituteorg/2021/05/tgn-02-21-assessing-landscape-value-outside-national-designations.pdf.</p> <p>Value can also be expressed within landscape character assessment evaluations, and landscape sensitivity studies. However, it is suggested that the current Hertfordshire Landscape Character Assessment may benefit from updating in this respect (as an extension to existing LCA or as an add on study). At a site (planning application) level, Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA) should be required to provide an assessment of landscape value. Landscape value should be determined through a review of existing assessments, policies, strategies and guidelines and, where appropriate, by new survey and analysis.</p>			
SC_00031-Natural England	Natural England		<p>Natural England wants to see the character of protected landscapes conserved and enhanced. Therefore, we welcome the criteria set out for appropriate development within or impacting on the Chilterns Area of Outstanding Natural Beauty (AONB), including encouraging enhancement of the AONB and presumption against major developments within the protected landscape. We would recommend a requirement for Landscape Visual Impact Assessments (LVIA) to be undertaken for developments within the protected landscape or its setting. Also, we would advise consultation with the Chilterns Conservation Board on developments relating to the AONB.</p>	<ul style="list-style-type: none"> • Welcome the criteria set out for appropriate development within or impacting on the Chilterns Area of Outstanding Natural Beauty (AONB), including encouraging enhancement of the AONB and presumption against major developments within the protected landscape. • We would recommend a requirement for Landscape Visual Impact Assessments (LVIA) to be undertaken for developments within the protected landscape or its setting. • we would advise consultation with the Chilterns Conservation Board on developments relating to the AONB 	<ul style="list-style-type: none"> • Agree the requirement for landscape visual impact assessments, as part of developments within the landscape or setting. • The Chilterns Conservation Board are already consulted on planning applications that relate to the AONB 	<p>Additional policy wording to be added to:</p> <p>'.....and whether it could have a significant adverse impact on the purposes of the AONB designation. A Landscape Visual Impact Assessment is to be submitted with planning applications for developments within the AONB or its setting'.</p>

Q21. Should we have considered alternative options?						
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BIODIVERSITY TREES AND WOODLANDS AND LANDSCAPING

Q22. Do you think the Preferred Biodiversity, Trees, Woodlands and Landscaping is the right approach?						
SC_00031-Natural England	Natural England		<p>Natural England supports the protection given to statutory sites as we encourage allocations that avoid impacts to designated sites and targeted towards land with the least environmental value. We therefore welcome the clear criteria set out for developments that would affect nationally designated Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs) and Local Wildlife Sites (LWSs) or protected species within Three Rivers District. We would advise that developments that would affect designated sites located outside, but adjacent, to Three Rivers District are also considered.</p> <p>Government policy is progressing to reverse the trend in biodiversity decline, which has continued to occur despite planning policy aimed towards no residual loss in biodiversity. This includes the revised NPPF which sees a strengthening of provision for net gain through development. We therefore welcome the inclusion of a requirement for applicants to be required to use the Defra Biodiversity Metric to demonstrate net gain in biodiversity within their developments. Please note that the preferred metric is the recently launched Defra Biodiversity Metric 3.0.</p>	<ul style="list-style-type: none"> • Supports protection to statutory sites and the clear criteria set out. • Advise that developments that would affect designated sites outside, but adjacent to TRDC are also considered • Welcome the inclusion of a requirement for applicants to be required to use DEFRA Biodiversity Metric to demonstrate net gain in biodiversity within new developments 	<p>Noted. Policy does not distinguish between designated sites within or adjacent to TRDC – it applies to any designated site affected by development.</p>	<p>Biodiversity net gains targets to be included in the Regulation 19 Local Plan as it's an ongoing process in collaboration with HCC and other Hertfordshire Authorities.</p>
SC_00017-Chalfont St Peter Parish Council	Chalfont St Peter Parish Council		<p>Development of these green field sites will without question have an adverse effect on biodiversity. It will result in the loss of agricultural land and areas of open countryside.</p> <p>We emphasise in conclusion that our concerns all relate to the areas proposed for development on the boundary with Chalfont St Peter having regard to the green belt, access and roads, sustainability, climate change, water and sewage and biodiversity.</p> <p>This response was approved by a meeting of the Parish Council on the 9th August 2021.</p> <p>We thank you for the opportunity to express these concerns during the consultation period of your proposed Local Plan and trust that our comments will be taken into consideration.</p>	<ul style="list-style-type: none"> • Development of the green field sites with have an adverse effect on Biodiversity. 	<p>Noted. Requirement for a net gain in biodiversity would be applied.</p>	<p>No action</p>
SC_00023-Croxley Green Parish Council	Croxley Green Parish Council		<p>Croxley Green Parish Council considers the suggestion that “the need for the development would outweigh the need to safeguard the site” is vague and easily open to abuse. The suggestion of alternative wildlife habitat provision shows a fundamental misunderstanding of ecology. “Minimising adverse effects” is not protection. “Maintaining the level of biodiversity in the area” as some form of aggregate measure is meaningless. Adequate protection requires that sites designated as important</p>	<ul style="list-style-type: none"> • The suggestion that “the need for the development would outweigh the need to safeguard the site” is vague and easily open to abuse. The plan should state categorically that development 	<ul style="list-style-type: none"> • Noted. • Requirement for a net gain in biodiversity would be applied. 	<p>Biodiversity net gains targets to be included in the Regulation 19 Local Plan as it's an ongoing process in collaboration with HCC and other Hertfordshire Authorities.</p>

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Parish Council			<p>are not disturbed. Years/decades of ecological development cannot simply be moved or replaced. Focusing on “species identified for retention” again shows a misunderstanding of ecology – a biodiverse location supports multiple species, many of which will not be identified/counted/placed on lists for retention. What is known of any location is at best a small sample of the life it supports. The plan should state categorically that development will not be permitted in the listed areas under the Local Plan. This is the only way to protect the ecosystems that they support.</p> <p>Where alternative wildlife habitat provision can be made in order to maintain local biodiversity; (3(b)) we suggest that provision of alternative sites should require a full EIA. We note that the DEFRA Biodiversity Metric is listed as the means to quantify the value of biodiversity, but suggest it be could be specified as the most recent DEFRA Biodiversity Metric (currently 2.0).</p> <p>We consider it is not acceptable to suggest that achievement of the biodiversity gain can be made at alternative local sites when it cannot be achieved at the site of the development. Even worse to propose that offset elsewhere nationally would be an acceptable remedy for destruction of biodiversity within Three Rivers. We would like to see something more definitive than just 'seek' to retain existing trees etc. We would also like to see landscaping directed by those with appropriate and independent expertise to ensure use of suitable diverse species for each location.</p> <p>The areas considered key for biodiversity should be more clearly specified, including use of maps / coordinates, perhaps by reference to other documents. Statements such as “Whippendell Woods and surrounds” are imprecise and too vague.</p>	<ul style="list-style-type: none"> will not be permitted in the listed areas under the Local Plan. Where alternative wildlife habitat provision can be made in order to maintain local biodiversity; (3(b)) we suggest that provision of alternative sites should require a full EIA. We note that the DEFRA Biodiversity Metric is listed as the means to quantify the value of biodiversity, but suggest it be could be specified as the most recent DEFRA Biodiversity Metric (currently 2.0) We consider it is not acceptable to suggest that achievement of the biodiversity gain can be made at alternative local sites when it cannot be achieved at the site of the development. We would like to see something more definitive than just 'seek' to retain existing trees etc. We would also like to see landscaping directed by those with appropriate and independent expertise to ensure use of suitable diverse species for each location. The areas considered key for biodiversity should be more clearly specified, including use of maps / coordinates, perhaps by reference to other documents. 	<ul style="list-style-type: none"> Noted Agreed. An updated Biodiversity Action plan is being prepared and once finalised will inform TRDCs evidence. 	
SC_00 024_A Langley Parish Council	Abbots Langley Parish Council		<p>The council has set a Biodiversity Survey of the district, will this form a level to start from? Also any wording for any tree / hedge installation or replacement has to be native, and of this country (ie no imports), a policy should be required to demonstrate all plant passports as a condition of habitation of the buildings.</p>	<ul style="list-style-type: none"> a policy should be required to demonstrate any tree / hedge installation or replacement has to be native, and of this country. 	<p>Noted. An updated Biodiversity Action plan is being prepared and once finalised will inform TRDCs evidence.</p>	<p>No action</p>
SC_00 026_H HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Preferred Policy Option 21, Biodiversity, Trees, Woodlands and Landscaping</p> <p>The policy intent to retain important landscape features is fully supported. However, it should be clear that in addition to trees and woodlands, this includes a range of natural and built features such as boundary treatments, and waterbodies and courses etc.</p> <p>With regard to paragraph a), it is suggested that the text within this paragraph should be expanded to not only ensure the retention of important features, but to require their protection and ongoing conservation through sustainable positive management.</p> <p>In relation to paragraph d), it is suggested that there should be requirements for development, in order to provide sufficient space to accommodate large-scale, native trees at maturity (and not just token 'lollipop' trees) to ensure the creation of a dense urban canopy that will help mitigate the impact of urbanisation (breaking up the built horizon) and provide maximum benefits for biodiversity, and the regulation of air/water/soil.</p> <p>It is suggested that paragraph f) could be strengthened to secure a net gain and require that for each tree removed, two new replacement trees should be provided.</p> <p>It is considered that the policy should also be updated to reflect the intent of the updated NPPF which states that: <u>“Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees 32 elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.”</u> (NPPF paragraph 131).</p> <p>The initial reference to Biodiversity Net Gain needs to be strengthened and related to the forthcoming Environment Act and subsequent update of the T&CPA which will be in place by the time this plan is adopted. BNG cannot apply on irreplaceable habitats and certain other types of site referenced in the NPPF. Much of the commentary needs to be updated and moved to the main policy. In the light of the above, it is suggested that the following amendments are made to Preferred Policy Option 21: Biodiversity Net Gain</p>	<ul style="list-style-type: none"> Paragraph a), it is suggested that the text within this paragraph should be expanded to not only ensure the retention of important features, but to require their protection and ongoing conservation through sustainable positive management. Paragraph d), it is suggested that there should be requirements for development, in order to provide sufficient space to accommodate large-scale, native trees at maturity Paragraph f) could be strengthened to secure a net gain and require that for each tree removed, two new replacement trees should be provided. The policy should also be updated to reflect the intent of the updated NPPF concerning trees (paragraph 131). The initial reference to Biodiversity Net Gain needs to be strengthened and related to the forthcoming Environment Act and subsequent update of the T&CPA which will be in place by the time this plan is adopted. BNG cannot apply on irreplaceable habitats and certain other types of site referenced in the NPPF. Much of the commentary needs to be updated and moved to the main policy. Suggested amendments to Policy 21 Biodiversity Net Gain. 	<p>Agreed.</p>	<ul style="list-style-type: none"> Paragraph a), expand text within this paragraph to require their protection and ongoing conservation through sustainable positive management. Paragraph d), suggested requirement for development, to provide sufficient space to accommodate large-scale, native trees at maturity? Paragraph f) could be strengthened to secure a net gain and require that for each tree removed, two new replacement trees should be provided? Agree amended wording concerning trees. <p><u>“Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees 32 elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.”</u> (NPPF paragraph 131).</p> <ul style="list-style-type: none"> Suggested amendments to Policy 21 to reflect the forthcoming environment act and requirement for Biodiversity Net Gains.

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		<p><u>1) Development is required to should result in a net gain of biodiversity value of at least 10%. This should be measured using the most recent version of the Defra Biodiversity Metric or its successor. The following hierarchy to delivering net gain must be applied:</u></p> <p><u>a. Avoiding harm to existing biodiversity</u></p> <p><u>b. Providing mitigation for unavoidable harm, and the required net gain, on site.</u></p> <p><u>c. Providing mitigation and the required net gain in close proximity to the site</u></p> <p><u>d. Providing mitigation and the required net gain at a further distance but within Hertfordshire e. Providing the required net gain outside of Hertfordshire or through the purchase of biodiversity credits</u></p> <p><u>i. The nature of the net gain and its location must be agreed with and approved by the local authority</u></p> <p><u>ii. The developer will be required to legally secure locations for biodiversity net gain on and off the site for the period set out in planning legislation, and also to provide for the maintenance and management of the site for the same period. This will also be subject to legal agreement.</u></p> <p><u>Protection of sites 2) The weight given to the protection of sites from development will be commensurate with their statutory status or identified quality according to their position in the hierarchy: • International • National • Regional • Local</u></p> <p><u>if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, following the mitigation hierarchy, then planning permission will be refused</u></p> <p>3) Development that would affect a Site of Special Scientific Interest, Local Nature Reserve, Local Wildlife Site or protected species under UK or European law, or the loss or deterioration of irreplaceable habitats (such as ancient woodland or veteran trees) or identified as being in need of conservation by the latest UK Post-2010 Biodiversity Framework, or the Hertfordshire Biodiversity Action Plan or Local Nature Recovery Strategy , will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests or integrity of the resource of the site, unless it can be demonstrated that: ...</p> <p>c) Adverse effects can be satisfactorily minimised addressed through mitigation and compensation measures to maintain and enhance the level of biodiversity in the area.</p> <p>4) ... [To add the following at the end of Part 4: Reference should be made to the Herts Ecological Network Mapping or to the Local Nature Recovery Strategy for further guidance.] ...</p> <p>6) "All development must conserve, enhance and, where appropriate, restore biodiversity through: a) Protecting habitats and species identified for retention b) Providing compensation for the loss of any habitats (as a last resort) a) Applying the mitigation hierarchy bc) Providing for the management of habitats and species where appropriate" cd)... de)...</p> <p>7) Linked habitat networks are important in enabling allowing species to withstand or adapt and respond to changing circumstances, such as the effects of land use change, increased disturbance or climate change. Development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape.</p> <p>8) When granting permission for any proposals that include measures to improve biodiversity, the Council will impose conditions or seek planning obligations that secure the delivery of biodiversity gain in perpetuity. [This is deleted as it needs to sit in the BNG part of the policy]</p>			
SC_00 027_T FL Comm ercial Develo pment	TFL Commercial Development	With regard to the specific standards for new development in Section 6 the inclusion of the text which discusses variation is supported as this allows for a range of different scenarios and different area context.	Noted	Noted	No action

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Q22. Should we have considered alternative options?			
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OPEN SPACE PLAY SPACE SPORT AND RECREATION

Q23. Do you think the Preferred Open Space, Play Space and Recreation is the right approach?			
SC_P1_00007_Sport England	Sport England	No	<p>The preferred policy option is broadly supported as it seeks to safeguard sport and recreation facilities and makes provision for new residential development to provide for the sport and recreation provision that it generates. The policy is considered to broadly accord with Government policy in paragraphs 96 and 97 of the NPPF. Notwithstanding the general support for policy option 22, it is requested that the following amendments are made:</p> <p>Part 1(iv) of the policy should add 'it can be demonstrated that' at the start to make it clear that it is the applicant's responsibility to demonstrate that an open space/sport/recreation facility deficiency will not be created rather than the Council's;</p> <p>The criteria in part 8 of the policy should be broadened to cover indoor and outdoor sports facilities rather than just playing pitches as this part of the policy applies to all sports facilities not just outdoor playing pitches i.e. criteria 8a and 8c would equally apply to tennis/netball courts for instance.</p> <p>Part 8 should also not just require major development proposals to provide for sports facilities as all residential developments will generate a demand for additional sports facilities regardless of their size and the cumulative impact of several smaller developments would be the same as a single major development;</p> <p>Part 9 of the policy should require open spaces to be designed so that they are multifunctional as this will encourage the spaces to be used for physical activity by a range of groups within the community.</p>
			<ul style="list-style-type: none"> Policy broadly supported and considered to accord with NPPF para 96 and 97. Notwithstanding the general support for policy option 22, it is requested that the following amendments are made: <ul style="list-style-type: none"> Part 1(iv) of the policy should add 'it can be demonstrated that' at the start to make it clear that it is the applicant's responsibility to demonstrate that an open space/sport/recreation facility deficiency will not be created rather than the Council's; The criteria in part 8 of the policy should be broadened to cover indoor and outdoor sports facilities rather than just playing pitches as this part of the policy applies to all sports facilities not just outdoor playing pitches i.e. criteria 8a and 8c would equally apply to tennis/netball courts for instance. Part 8 should also not just require major development proposals to provide for sports facilities as all residential developments will generate a demand for additional sports facilities regardless of their size and the cumulative impact of several smaller developments would be the same as a single major development; Part 9 of the policy should require open spaces to be designed so that they are multifunctional as this will encourage the spaces to be used for physical activity by a range of groups within the community.
			Agreed.
			<p>Part 1 iv) to be amended:</p> <p>iv) It can be demonstrated that a A deficiency of open space, sport and recreation facilities is not created through or exacerbated by its loss, now or over the plan period</p> <p>Part 8) a) and c) to be amended</p> <p>a) The enhancement of existing pitches indoor and outdoor sports facilities to increase their capacity or</p> <p>b) Securing greater community access to currently restricted provision or</p> <p>c) The provision of new playing pitches indoor and outdoor sports facilities on existing sites</p> <p>Part 9) to be amended</p> <p>Design of Open Space</p> <p>9) Proposals for new or existing open space should be designed so that they are multifunctional, to a high standard and should not consist of large areas of open grass. The design of open space should have regard to the relationship between the open space and its surroundings, the level and kind of use likely given the nature of nearby uses and occupants, the need to maintain a variety and balance of different forms of open space and the need to maintain and enhance existing nature conservation interests and the benefits of creating new habitats.</p>
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council		<p>Croxley Green Parish Council considers this policy requires more detail. In particular no recreation sites should be built on unless a locally acceptable alternative has been provided. Otherwise we support the approach in general.</p>
			<ul style="list-style-type: none"> Supports general approach This policy requires more detail. In particular no recreation sites should be built on unless a locally acceptable alternative has been provided.
			Noted.
SC_00026_HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>9) Trees, Woodland and Landscaping</p> <p>a) ...Landscaping proposals should also include new trees and other planting to enhance the landscape and habitats of the site and its surroundings as appropriate and contribute to local climate amelioration and natural flood control. For biodiversity benefit these should be locally native, adhere to biosecurity needs and be future proofed as to known disease susceptibility e.g. ash die-back."</p>
			<ul style="list-style-type: none"> Further changes are suggested to the supporting text in paragraphs 10.20 and 10.21, 10.23-10.27, 10.29-10.31, 10.33-10.35 and 10.37. Preferred Policy Option 22, Open Space, Play Space, Sport and Recreation. HCC is expected to see reference to the ANGST standard and would like to refer you to the
			Agreed.
			<ul style="list-style-type: none"> Further changes are suggested to the supporting text in paragraphs 10.20 and 10.21, 10.23-10.27, 10.29-10.31, 10.33-10.35 and 10.37. Preferred Policy Option 22, HCC expects reference to the ANGST standard and mapping areas of Green and Blue infrastructure

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		<p>e) "Planning permission will be refused for any development resulting in the loss or deterioration to protected woodland (including ancient woodland), protected trees (including aged or veteran trees), historic orchards and hedgerows, unless conditions can be imposed to secure their protection."</p> <p>f) "Where the felling of a tree or removal of a hedgerow is permitted, a replacement tree or hedge of an appropriate species, size and in a suitable location will be required, taking account of issues such as landscape, and biodiversity and local distinctiveness."</p> <p>g) Areas forming part of development proposals which are to be transferred to the local authority for maintenance should be designed for ease of access and low cost effective maintenance overheads and management regimes.</p> <p>Further changes are suggested to the supporting text in paragraphs 10.20 and 10.21, 10.23-10.27, 10.29-10.31, 10.33-10.35 and 10.37.</p> <p>Paragraph 10.20 "...It is important that those not covered by designations are <u>also</u> retained, protected and wherever possible, added to, since pressure for development will increasingly threaten trees, woodlands, <u>orchards</u>, hedgerows watercourses and their surrounding habitat. <u>Local Authorities are obliged to conserve and enhance biodiversity wildlife and landscape</u> under the Natural Environment and Rural Communities Act 2006 and the Water Framework Directive and the Natural Environment White Paper.</p> <p>Paragraph 10.21 It is considered that paragraph 10.21 duplicates the policies set out previously and should therefore be deleted</p> <p>Paragraph 10.23 The Local Nature Partnership is currently in abeyance and its successor body is not yet known. It is therefore suggested that the following amendments are made: "The Hertfordshire Local Nature Partnership has been established in response to the Natural Environment White Paper and will take a strategic lead on how the natural environment can be taken into account in decision making within the local area. Local Nature Recovery Strategy prepared under the Environment Act 2021, will be taken into account in decision making." <u>The Local Nature Partnership may identify or endorse priority areas for habitat conservation and restoration."</u></p> <p>Paragraph 10.24 The first paragraph should be amended as follows: "Three Rivers has a number of important wildlife sites, ranging from nationally <u>important statutory</u> designated Sites of Special Scientific Interest (SSSIs) to Local Nature Reserves (LNRs) and sites of local wildlife importance referred to as Local Wildlife Sites."</p> <p>And the final bullet point under the heading: 'Local Nature Reserves' should be expanded as follows: • 144 Local Wildlife Sites (<u>designated by the Local Wildlife Site partnership</u>)</p> <p>Paragraph 10.25 It should be noted the Biodiversity Action Plan (BAP), as referenced within this paragraph, is being replaced by the Local Nature Recovery Strategy in the 2021 Environment Bill.</p> <p>Paragraph 10.26 The text within this paragraph should be amended as follows These represent priority areas for conserving existing biodiversity resource and also provide the best opportunity for maintaining and creating large areas of quality habitat. The Council will give particular weight to impacts of development on biodiversity and ecological connectivity within Key Biodiversity Areas as defined in the BAP and the <u>Local Nature Recovery Strategy</u></p> <p>Paragraph 10.27 This paragraph appears to be a repeat of earlier sections in the Green and Blue Infrastructure policy. If this paragraph is retained, the following amendments to the text should be made: "Biodiversity is a key element of Green Infrastructure (networks of green spaces, <u>features</u> and <u>semi-natural features in both urban and rural areas</u>, elements including open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage, heritage assets, earth science interests and open countryside)."</p> <p>Paragraphs 10.29 and 10.30 It is considered that paragraphs 10.29 and 10.30 can be deleted as they are included in the policy wording.</p> <p>Paragraph 10.31 Amendments to the text should be made as follows: "Developers should have regard to design to minimise the potential impact of development proposals on biodiversity, trees, watercourses and woodlands from the outset..."</p> <p>Paragraph 10.33 Amendments to the text should be made as follow "In accordance with national planning policy on biodiversity and geology, the Council will conserve, restore and, where possible, enhance</p>	<p>comments earlier on mapping areas of Green and Blue infrastructure deprivation on Preferred Policy Option 21.</p>		<p>deprivation on Preferred Policy Option 21.</p>
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			<p>Paragraph 10.34 Amendments to the text should be made as follows: “When considering development proposals, the Council will take account of <u>the appropriate</u> legislation and guidance, UK Post-2010 Biodiversity Framework, the Hertfordshire Biodiversity Action Plan, <u>Local Nature Recovery Strategy and Networks</u> and other relevant information to:</p> <ul style="list-style-type: none"> • Assess the importance of a habitat • Consider the potential impact of development 37 • Identify ways <u>the development can</u> to conserve and enhance biodiversity in Three Rivers <p>Paragraph 10.35 It is suggested that the last sentence within paragraph 10.35 should be deleted as follows: “The Council will support measures identified in management plans (including the Thames River Basin Management Plan) and related status reports for Sites of Special Scientific Interest, Local Nature Reserves and other wildlife sites that seek to conserve, enhance and restore biodiversity. Where appropriate, developers will be required to contribute to improvements in biodiversity as part of their proposals.”</p> <p>Paragraph 10.37 The text within the first sentence of this paragraph should be amended, along with an additional bullet point added, as follows: “Landscaping proposals – <u>often in the form of a Landscape and Ecology Management Plan (LEMP)</u> should address: • <u>Supporting pollination, securing connectivity across a development site e.g. hedgehog holes, and provision of nesting sites for birds, bats and insects where appropriate.</u>”</p> <p>Preferred Policy Option 22, Open Space, Play Space, Sport and Recreation HCC is expected to see reference to the ANGST standard and would like to refer you to the comments earlier on mapping areas of Green and Blue infrastructure deprivation on Preferred Policy Option 21.</p>			
SC_00027_TFL Commercial Development	TFL Commercial Development		<p>Part 4 and 5 seems to repeat each other and they could be combined for clarity and succinctness. Part 7 notes that materials used should be sustainable, this element is more appropriately covered in Policy 13. Also, as currently worded it seems to imply that all materials must be sustainable which may not be possible.</p>	<ul style="list-style-type: none"> • Parts 4 and 5 seem to repeat each other and could be combined for clarity and succinctness; • As currently worded implies that all materials must be sustainable which may not be possible. 	Agreed. The policy and supporting justification will be reviewed ahead of the next stage of the Local Plan.	Review ahead of next stage of the Local Plan.

Q23. Should we have considered alternative options?

LOCAL DISTINCTIVENESS AND PLACE SHAPING

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_P10007_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</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 	<p>Preferred Policy 11 Health and Wellbeing states: (1) All development shall be designed to maximise the impact it can make to promoting healthy</p>	<p>Additional wording to be added to Policy 11 Health and Wellbeing: After 6.10 and before 6.11:</p>

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			<p>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>	<p>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.</p> <ul style="list-style-type: none"> That reference to Sport England's Active Design Guidance should be referred to in the supporting text. 	<p>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>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_00 023_C 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> <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>	<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>Do we have character area appraisals?</p> <p>Is there a HCC design guide relating to residential extensions and the historic buildings or is this covered under the Heritage Assessments?</p> <p>We need to develop a policy on tall buildings identifying those areas we want to encourage it.</p>
SC_00 024_A 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>	<p>No action</p>

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SC_00 026_H CC 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>
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Q24. Should we have considered alternative options?

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ADVERTISEMENTS

Q25. Do you think the Preferred Advertisements is the right approach?						
SC_00023 _Croxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council considers there should be a reference to locally relevant design guidance in Neighbourhood Plans. Otherwise we support the general approach.	<ul style="list-style-type: none"> Support general approach but reference to be made to locally relevant design guidance in NPs. 	This is an overarching policy and not specific to a particular area and therefore no reference will be made to locally derived design guidance.	No action
SC_00024 _Abbots Langley Parish Council	Abbots Langley Parish Council	Yes	support	<ul style="list-style-type: none"> support 	Noted	No action
SC_00030 _Highways England	Highways England		<p>Highways England is supportive of this policy, but reference should be made to advertisements and the SRN. The display of advertisements is subject to a separate consent process within the planning system. This is principally set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.</p> <p>Most advertisements on land directly facing motorways and trunk roads require the express consent from the relevant local planning authority as well as prior permission from the landowner before they may be displayed lawfully. It is a requirement of the local planning authority to consult Highways England on the road safety aspects of advertisements proposed alongside the SRN. Advertisements that are likely to distract motorists are unlikely to be approved. Highways England should be consulted on any advertisement proposals close to the SRN and Highways England will need to consider its location, if visible from the SRN, its size, brightness/lighting (if any) and its effect on public safety. Most of the SRN within Three rivers is subject to the lighting mid-night to 5 am switch off so there presence of bright internally illuminated signing would for the most part be inappropriate in these settings.</p>	<ul style="list-style-type: none"> Noted 	This is an overarching policy and not specific to Highways England and the SRN.	No action

Q25. Should we have considered alternative options?						
				<ul style="list-style-type: none"> 		
				<ul style="list-style-type: none"> 		

HERITAGE AND THE HISTORIC ENVIRONMENT

Q26. Do you think the Preferred Heritage and the Historic Environment is the right approach?						
SC_0000 2_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>	<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, 	<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: Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset,</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. 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>

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	<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 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>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> <ul style="list-style-type: none"> 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 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. 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>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>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>Consider adding 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>
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			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.			
SC_0002 3_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.	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.
SC_0002 4_Abbots Langley Parish Council	Abbots Langley Parish Council	No	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.	<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_0002 6_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 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 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.</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</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, 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. 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 	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> <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>

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			<p>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 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>	<p>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.</p> <ul style="list-style-type: none"> 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. 		
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_Natural 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 	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>

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				improve access to nature in addition to providing recreational, health and wellbeing benefits for people.		
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Q26. Should we have considered alternative options?						

SUSTAINABLE TRANSPORT AND TRAVEL

Q27. Do you think the Preferred Sustainable Transport and Travel is the right approach?						
SC_P1_00007_Sport England	Sport England	Yes	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.	<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. 	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. Therefore there is no need to repeat this in Local Distinctiveness and Place Shaping policy 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	Additional wording to be added to Policy 11 Health and Wellbeing: After 6.10 and before 6.11: 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
SC_00019_Watford Borough Council	Watford Borough Council	Yes	The policy option could be more positive and reference the Transport Hierarchy to prioritise alternative modes of transport than private vehicle and reduce impact on the environment which is consistent with the aspiration to deliver sustainable development. To support a long-term modal shift, the cycle parking standards set out in Appendix 3 could be more positive, particularly within the sustainability zones where lower car parking standards are proposed.	<ul style="list-style-type: none"> The policy option could be more positive and reference the Transport Hierarchy to prioritise alternative modes of transport than private vehicle and reduce impact on the environment which is consistent with the aspiration to deliver sustainable development. To support a long-term modal shift, the cycle parking standards set out in Appendix 3 could be more positive, particularly within the sustainability zones where lower car parking standards are proposed. 	Agreed.	Update parking standards in accordance with HCC parking standards.
SC_00017_Chalfont St Peter Parish Council	Chalfont St Peter Parish Council		The two (formerly three) east-west routes referred to in paragraph 4 on page 1 are the only direct means of travel between the two communities and beyond. They are popular routes for people travelling to areas such as Harefield, Mount Vernon Hospital, Watford, Rickmansworth and the M25. A significant factor in the growth in recent years of Chalfont St Peter is the influx of residents who have moved out from the Harrow area and in many cases continue to work there taking a route through these two lanes.	<ul style="list-style-type: none"> Large development in Chalfont St Peters will generate large amounts of extra traffic in both directions; Traffic volumes are expected to rise by 15.6% but yet there is no traffic survey data on the roads surrounding the development; Presume the 15.6% does not take account impact of a large 	Representations from the Hertfordshire Highways Authority will be taken in to consideration. The Transport Assessment will identify mitigation measures required and any identified measures will be included in the Infrastructure Delivery Plan.	Move to part 2- this is referencing a site.

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			<p>On the Maple Cross side the initial bends leading from the motorway bridge are narrow and twisting and require passing spaces.</p> <p>A large development here will generate large amounts of extra traffic in both directions. The existing infrastructure is not up to the extra traffic volume. We note your estimate that traffic volumes are expected to rise by 15.6% between 2017-2031. We have noted an absence of traffic survey data on the roads surrounding the particular developments. Presumably this 15.6% increase does not take into account the impact of a large development on the A412 North Orbital Road, Hornhill Road, The Hawthorns and Chalfont Lane.</p> <p>Much the same is true of the only other remaining east-west axis route from Gorelands Lane to Chalfont Lane. To the west Gorelands becomes a narrow country road with barely passing spaces at points for two vehicles. The high density of housing proposed will place significant pressure on both these routes.</p> <p>We have grave concerns that development on this scale across these country lanes will have huge implications for our residents and those of the wider Buckinghamshire area. The North Orbital is already a busy two lane road and housing on this scale will have a massive impact on traffic flow between the A40/M40 and Rickmansworth/Watford. Again, where is the relevant traffic data?</p>	<p>development on A412 North Orbital Road;</p> <ul style="list-style-type: none"> Narrowness of roads cannot accommodate additional development; Have grave concerns that development on this scale across the country lanes will have huge implications for residents and those of wider Buckinghamshire area 		
SC_00 023_C Croxley Green Parish Council	Croxley Green Parish Council	Yes	<p>Travel and transport are currently one of the major sources of carbon emissions. There will need to be a significant shift to sustainable forms of transport with more electric vehicles, including bicycles and scooters. The policies to support sustainable transport and travel do not seem to address the scale of the changes that will be needed. We suggest, in particular, further consideration of the following points:</p> <ul style="list-style-type: none"> Provision of charging points for electric vehicles Support for hydrogen infrastructure when appropriate. Support for shared transport and shared car systems. Support for bus transport Protection of and promoting the Croxley Link corridor for sustainable modes. Working with others to make pedestrian crossing of roads safe and easy and Consider introducing 20mph zones in residential areas. <p>We endorse the comments from Jed Griffiths' statement about the importance of coordinating transport planning with the Local Plan. In particular the need to define "acceptable walking distances" and "safe access routes" for pedestrians and cyclists. And the need for Transport Assessments to consider the impact on the capacity of the local network to provide for all modes as well as the environment and public amenity. Otherwise we support the general approach</p>	<ul style="list-style-type: none"> The policies to support sustainable transport and travel do not seem to address the scale of the changes that will be needed. Suggest the need to define "acceptable walking distances" and "safe access routes" for pedestrians and cyclists. And the need for Transport Assessments to consider the impact on the capacity of the local network to provide for all modes as well as the environment and public amenity. Support general approach 	Noted.	No action
SC_00 024_A Abbots Langley PC	Abbots Langley Parish Council		<p>The 15.6% rise in transport should be seen as the critical level and we need to set a bar to come below that and set ways of doing it, also localised neighbourhoods with access to shops and infrastructure, as noted in the first three pages, some of the proposed sites fail in this area, demonstrating a contradiction of all these policies when sites have been approved.</p>	<ul style="list-style-type: none"> The 15.6% should be seen as the critical level and we need to set policy to stay below this. 	Representations from the Hertfordshire Highways Authority will be taken in to consideration. The Transport Assessment will identify mitigation measures required and any identified measures will be included in the Infrastructure Delivery Plan.	No action
SC_00 026_H HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Preferred Policy Option 26: Sustainable Transport and Travel</p> <p>HCC supports part 1 and part 2 of this policy. However, with regard to the Development Proposals section in this policy, it is recommended that the text should align closer to Policy 1 of HCC's LTP4.</p> <p>The text within paragraph 4) d) of the policy should be amended as follows, as high quality bus stops are not just about shelters, but are also about accessible design, and infrastructure also includes easy access kerbing and display screens where appropriate: "The provision and improvement of public transport access including layouts to enable convenient access for buses, bus priority <u>where possible and accessible bus stops with high quality infrastructure;</u> and provision of covered waiting facilities where appropriate;"</p> <p>It is also suggested that part 4) e) of the policy could be expanded as to include some set criteria such as a number of developments which may be more relevant and appropriate for this, for example, station forecourts, town centres but not in general and do often represent a single occupancy vehicle which cannot be considered sustainable.</p> <p>The Place and Movement Design Guide should be referenced to part 6 of this policy. In addition, the link to the Travel Plan Guidance sets out criteria for production of Travel Plans can be viewed with the following link: www.hertfordshire.gov.uk/travelplans</p>	<ul style="list-style-type: none"> HCC supports part 1 and part 2 of this policy. However, with regard to the Development Proposals section in this policy, it is recommended that the text should align closer to Policy 1 of HCC's LTP4 as suggested. Suggested wording amendments for paragraph 4) d) of the policy. It is also suggested that part 4) e) of the policy could be expanded as to include some set criteria such as a number of developments which may be more relevant and appropriate for this, for example, station forecourts, town centres but not in general and do often represent a single occupancy vehicle which cannot be considered sustainable The Place and Movement Design Guide should be referenced to part 6 of this policy. Suggested wording for paragraph 12.20 	Agreed	<p>The text within paragraph 4) d) of the policy should be amended as follows, as high quality bus stops are not just about shelters, but are also about accessible design, and infrastructure also includes easy access kerbing and display screens where appropriate: "The provision and improvement of public transport access including layouts to enable convenient access for buses, bus priority <u>where possible and accessible bus stops with high quality infrastructure;</u> and provision of covered waiting facilities where appropriate;"</p> <p>Paragraph 12.20 -The following wording should be added at the end of the paragraph as follows: "<u>...and accessible bus stops with high quality infrastructure.</u>"</p> <p>It is also suggested that this paragraph reference to HCC's Intalink Bus Strategy and the Rail Strategy.</p>

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		<p>Paragraph 12.20 It should be noted that high quality bus stops are not only about shelters. The following wording should therefore be added at the end of the paragraph as follows: <u>"...and accessible bus stops with high quality infrastructure.</u> It is also suggested that this paragraph reference to HCC's Intalink Bus Strategy and the Rail Strategy which set out the county council's approach to working with bus operators and the rail industry to improve networks, access, and encourage usage.</p> <p>Paragraph 12.22 It is considered that Place and Movement Design Guide should be mentioned as part of the reference.</p>	<ul style="list-style-type: none"> Paragraph 12.22- It is considered that Place and Movement Design Guide should be mentioned as part of the reference. 		<p>Make reference to the Place and movement Design Guide to part 6 of this policy and paragraph 12.22.</p>
SC_00 028_C anal & River Trust	Canal & River Trust	<p>Preferred policy option 26 states that the transfer of road freight to the canals in the district would be supported in principle. The 1968 Transport Act designates the Grand Union canal as a cruising waterway, and there is therefore no obligation on the Trust to facilitate freight. This does not mean that the Trust would not consider the movement of freight on a cruising waterway, but it must be recognised that there is no obligation to do so. The use of the canal to carry freight would largely depend on the extent required and maintenance implications for the waterway.</p> <p>The Trust must be contacted for further discussions as the particular working practises and frequency required, costs, management etc would be key to determining the overall suitability of any proposals for freight on the waterway. The policy should be amended to reflect this and the need for consultation with the Canal & River Trust for any proposals relating to the Grand Union canal highlighted.</p> <p>The canal towpath is an important traffic free route for walking /cycling for both leisure and utility walkers and represents a multifunctional asset, providing linkages to local facilities, recreational opportunities, and a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. The plan acknowledges this potential and requires developments to link to and from the towpath. Whilst 'enhancement of existing cycle and walking routes' could include the towpath, it is considered that the second part of 4c) adds some ambiguity, and this would benefit from some amendments to ensure it is clear that developments need to look at enhancements to the towpath and access points, not just the linkages to and from the canal and the proposed development.</p> <p>Improvements to integrate the canal corridor into adjacent development and create / strengthen links to other areas of open space also need to be considered. This could include improvements to the existing towpath, improving signage and creating circular walks or heritage trails.</p> <p>In partnership with Sustrans the Trust is considering projects in the area, with Sustrans already having National Cycle Network routes within the Colne Valley, and further opportunities to enhance the network could be explored and supported within the Plan.</p>	<ul style="list-style-type: none"> The Canal Trust must be contacted for further discussions as particular working practices and frequency required, costs, management etc would be key to determining overall suitability of any proposals for freight on the waterway; Policy should be amended to reflect this and the need for consultation with the Canal & River Trust for any proposals relating to the Grand Union canal highlighted; Towpath -Whilst 'enhancement of existing cycle and walking routes' could include the towpath, it is considered that the second part of 4c) adds some ambiguity, and this would benefit from some amendments to ensure it is clear that developments need to look at enhancements to the towpath and access points, not just the linkages to and from the canal and the proposed development. In partnership with Sustrans the Trust is considering projects in the area, with Sustrans already having National Cycle Network routes within the Colne Valley, and further opportunities to enhance the network could be explored and supported within the Plan. 	Agreed amendment.	<p>Amend policy by taking out the reference to the transfer of road freight to the canal and to reflect the need for consultation with the Canal & River Trust for any proposals relating to the Grand Union canal.</p> <ul style="list-style-type: none"> Amend the second part of 4c) to ensure it is clear that developments need to look at enhancements to the towpath and access points, not just the linkages to and from the canal and the proposed development. Note that the canal Trust in partnership with Sustrans is seeking projects in the area- will need to be incorporated within the infrastructure plan.
SC_00 030_Hi ghway s Englan d	Highways England	<p>For Policy 27 concerning transport, reference should be made to Highways England and the SRN</p> <p>We note paragraph 12.7 refers to 'the Highways Agency' and ask this now be updated to reference 'National Highways' which was formally announced on 19th August to be the new name for this organisation. Although reference to Highways England will remain as a common term in a vast majority of correspondence for some time.</p> <p>Highway England is supportive of the text provided and asks that Three Rivers District Council promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. This is reflected in Paragraph 12 of Circular 02/2013 states that 'the preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'</p> <p>Highways England welcomes measures to reduce traffic generation at its source and the provision of sustainable transport measures. Whilst Highways England supports a sustainable transport strategy, we also have to realistic in understanding if these measures would discourage vehicle trips travelling on the SRN, which are largely strategic journeys in nature. For Highways England, it is measures such as public transport enhancements i.e. bus, underground, rail, or improved integration of these services that would only realistically affect the number of vehicle trips that would otherwise travel on the SRN. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the District, without careful consideration of mitigation measures. It is important that the Local Plan provide the</p>	<ul style="list-style-type: none"> Specific reference to the SRN should be included in Policy 27; Change reference in Paragraph 12.7 to National Highways; Highway England is supportive of the text provided and we ask that Three Rivers District Council promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, if the benefits for managing down demand and reducing the need to travel on the SRN is suitably evidenced. Highway England would request transport evidence and modelling to be undertaken to determine what the cumulative impact of these developments could be on the SRN and therefore, what measures may be required to mitigate these 	Agreed.	<ul style="list-style-type: none"> Make reference to Highways England and the SRN in policy 27. Paragraph 12.7- update reference from the Highways Agency to 'National Highways'. <p>The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound.</p> <p>IDP needs to be undertaken.</p>

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			<p>planning policy framework to ensure development cannot progress without the appropriate infrastructure in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, if the benefits for managing down demand and reducing the need to travel on the SRN is suitably evidenced.</p> <p>Specific reference to the SRN should be included in Policy 27.</p> <p>Paragraph 18 of Circular 02/2013 states that ‘capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. Highways England will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.’ Beyond sustainable transport measures, physical junction improvements may be required. Highways England draws your attention to Paragraphs 9 and 10 of the Circular which refers to development proposals being unacceptable, by virtue of a severe impact, if they increase demand for use of a section of the network that is already operating over-capacity or cannot be safely accommodated within the existing infrastructure provision, unless suitable mitigation is agreed. In such a circumstance, mitigation would be requested. For the Local Plan, this should be presented as an Infrastructure Delivery Schedule (IDS) / Infrastructure Delivery Plan (IDP) or related document. Highway England would request transport evidence and modelling to be undertaken to determine what the cumulative impact of these developments could be on the SRN and therefore, what measures may be required to mitigate these impacts. This should take account of already committed development and infrastructure proposals affecting the SRN. It is therefore unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations, or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. Highways England ask to be consulted on all steps in the development / identification of this transport information, able to comment on the appropriateness of the raw data, modelling assumptions and modelling software to be used, etc. A scoping report should be submitted to Highways England in the first instance to agree the modelling and trip generation parameters.</p> <p>Until this has been submitted, Highways England is not in a position to offer further comments as to the soundness of the Plan. We would welcome a conversation on this, if it would be helpful.</p> <p>The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates for interim assessments to show when mitigation action will be required.</p>	<p>impacts. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates for interim assessments to show when mitigation action will be required. Highways England cannot offer more commentary until IDP is submitted</p>		
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Q27. Should we have considered alternative options						
SC_00 019_W atford Borough Council	Watford Borough Council	yes	<p>The former Metropolitan Line Extension provides a significant opportunity to improve connections between Watford Junction and the area of Ascot Road which is seeing high density development at present. Watford has explored potential uses of the route including light rail, bus corridor and walking/cycling infrastructure that can all contribute towards achieving a long-term modal shift using sustainable transport modes. The route subject to the exploration of transport options as part of the Croxley Line Safeguarding for Mass Rapid transport Technical Report (2020) terminates at the north end of Ascot Road near the Three Rivers - Watford boundary. It is suggested that potential long-term options be recognised as part of a long-term sustainable transport strategy and this be reflected in policy so policy hook is in place that could maximise the value of the former MLX route and any opportunities that may arise to support sustainable development.</p>	<ul style="list-style-type: none"> It is suggested that potential long-term options be recognised as part of a long-term sustainable transport strategy and this be reflected in policy so policy hook is in place that could maximise the value of the former MLX route and any opportunities that may arise to support sustainable development. 	Noted.	Discussions ongoing regarding the metropolitan line extension and new route alignment.

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PARKING

Q28. Do you think the Preferred parking is the right approach?						
SC_P1_00008_Home Builders Federation	Home Builders Federation	No	We do not consider that part 1 of the policy to be sound as it states that the parking standards set out in appendix 3 will be preferred until the standards are revised. This implies that the standard could be revised through supplementary guidance and not through a review of this policy. It is not appropriate for policies in a local plan to be amended through supplementary guidance and as such we would suggest that the phrase “until such time that standards are revised” is deleted.	<ul style="list-style-type: none"> Do not consider that part 1 of the policy to be sound as it states that the parking standards set out in appendix 3 will be preferred until the standards are revised. Implies that the standard could be revised through supplementary guidance and not through a review of this policy. It is not appropriate for policies in a local plan to be amended through supplementary guidance and as such we would suggest that the phrase “until such time that standards are revised” is deleted 	Noted.	Possible change required – needs further discussion Are we expecting a revised standard? If not delete as suggested
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	No	<p>It is not clear whether “development” in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms. Where the number of potentially usable bedrooms is increased the parking standards should apply, wherever possible, including the requirement to provide for electric vehicles and cycles. Croxley Green Parish Council supports the requirements for active and passive provision for electric vehicles. However, there should be greater consideration of the emerging needs for electric cycles, cycle trailers and cargo cycles and greater provision for all types of cycles in all settings, and particularly residential properties. Both the need for parking provision and for safe storage within the curtilage or nearby.</p> <p>We suggest that there should be explicit consideration of the parking requirements for car clubs and rented vehicles, particularly for flats in class C3. We note the comments from Jed Griffiths’ statement about the difficulties of balancing the demand for car parking with support for sustainable transport. In particular we suggest the minimum parking standards for the C3 use class could be increased to: • 1 Bedroom, 1 space (full size) • 2 or 3 bedrooms, 2 spaces (full size) • 4 or more bedrooms, 3 spaces (full size) minimum</p>	<ul style="list-style-type: none"> It is not clear whether “development” in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms. Support the requirements for active and passive provision for electric vehicles. However, there should be greater consideration of the emerging needs for electric cycles, cycle trailers and cargo cycles and greater provision for all types of cycles in all settings, and particularly residential properties. suggests that there should be explicit consideration of the parking requirements for car clubs and rented vehicles, particularly for flats in class C3 and the minimum parking standards for the C3 use class could be increased. 	Noted. The policy refers to new development schemes.	No action
SC_00024_Abbots Langley PC	Abbots Langley Parish Council	No	Off road parking means more hardstanding and it contravenes the flooding policies, why cannot the proposal for new housing require car pool schemes?	<ul style="list-style-type: none"> See comment 	Noted.	No action

Q28 Should we have considered alternative options?						
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DELIVERIES SERVICING AND CONSTRUCTION

Q29. Do you think the Preferred Deliveries, Servicing and Construction is the right approach?						
SC_00030_Highways England	Highways England		Reference should be made to Highways England and the SRN. For sites positioned close to the SRN, or which would place a sizeable amount of construction vehicles on the SRN, any impacts arising from any disruptions during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported. A detailed Construction Management Plan (CMP) may also be required, including detailed traffic management measures during construction of the access junction and road to ensure the operation of the SRN is not	<ul style="list-style-type: none"> Make reference to Highways England and SRN in this question; For sites close to the SRN, any impacts should be fully assessed. A detailed Construction Management Plan should be provided alongside proposals to 	<ul style="list-style-type: none"> References to Highways England and SRN will be added in future versions of the plan; Construction Management Plans will be added as a condition to the application 	Add reference to Highways England and SRN.

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			adversely affected. There would be identified and requested during the planning application submission stage or as a Highways England identified planning condition on any planning permission granted.	ensure operation of SRN is not adversely affected.		
SC_00 024_A Abbots Langley PC	Abbots Langley Parish Council	Yes	Agree	<ul style="list-style-type: none"> support 	Support welcomed	No action

Q29. Should we have considered alternative options?

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WATERWAYS

Q30. Do you think the Preferred Waterways is the right approach?

SC_00 023_C Croxley Green Parish Council	Croxley Green Parish Council	NO	Our local rivers and waterways are at risk from climate change and from discharges whether consented or not. The Local Plan should seek to improve their condition by protecting them from unauthorised and authorised discharges and encouraging "rewilding" developments to enhance diversity of natural habitats. Otherwise we support the approach in general.	<ul style="list-style-type: none"> The Local Plan should seek to improve their condition by protecting them from unauthorised and authorised discharges and encouraging "rewilding" developments to enhance diversity of natural habitats. 	Noted.	No action
SC_00 024_A Abbots Langley PC	Abbots Langley Parish Council	Yes	Support	<ul style="list-style-type: none"> Support 	Noted.	No action
SC_00 028_C Canal & River Trust	Canal & River Trust		<p>The inclusion of a policy specifically relating to waterways is positive though it is not clear if this policy relates specifically to canals or is also aimed at other waterways in the plan area.</p> <p>This should be clarified, though the Trust would be supportive of a canal specific policy to ensure the particular considerations for development along the canal corridor are clearly set out and we are keen to work with you to develop this as the Plan progresses.</p> <p>Preferred Policy Option no29 currently sits within the 'Transport & connections section' of the document though as identified above the waterways are significant Green / blue Infrastructure which serve in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage, and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunications. They also offer opportunities for leisure, recreation and sporting activities as part of the 'natural health service' acting as 'blue gyms' and supporting physical and healthy outdoor activity.</p> <p>It would therefore be preferable to include a separate section within the Local Plan on the Grand Union canal to ensure it is clearly identified as an important and valued multi-functional asset. This would also aid in clearly setting out the requirements for proposed developments on or adjacent to the canal corridor. Furthermore, a canal specific section would provide greater clarity on the different types of moorings on the network and the aims and objectives of the policy in this regard. To reflect the multi-functional nature of the canal the wording within the policy should also be expanded to include reference to more specific considerations for development on or adjacent to the canal corridor, such as design principles, heritage, structural integrity, water quality towpath enhancement etc.</p> <p>For example, the Trust recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water</p>	<ul style="list-style-type: none"> Not clear whether policy specifically to canals or is aimed at other waterways in the plan area; Include a separate section within the Local Plan on the Grand Union Canal to ensure it is clearly identified as an important and valued multi-functional asset; Trust recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation; Trust would also require any development at the canal frontage to not adversely affect the integrity of the waterway structure; Waterways towing path and environs should form an integral part of the public realm in terms of design and management; Trust are keen to work with the Council for a canal specific section/ policy 	<p>Noted. The policy would include Canals and it is recognised that this needs to be made clearer for the next stages of the Local Plan process.</p> <p>It is considered that the once the policy is amended to make it clear that Canals are included within the waterways policy, that there is not a need to have a separate policy for the Grand Union Canal as the points raised would be covered by the Waterways policy.</p> <p>Any development at the Canal would need to demonstrate that it does not adversely affect the Canal.</p>	Amend the policy to make clear that Canals form part of the Waterway Policy.

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		<p>should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored. Waterways themselves should be the starting point for consideration of any development and use of the water and waterside land – look from the water outwards, as well as from the land to the water.</p> <p>The Trust would also require any development at the canal frontage to not adversely affect the integrity of the waterway structure. New waterside development needs to be considered holistically with the opportunities for water-based development, use and enhancement. It is important that developments respond appropriately to the historic significance of the canal whilst protecting its character and historical integrity. Developments need to consider the impact on water quality and enhancing the landscape, ecological quality and character of the waterways.</p> <p>A waterway's towing path and its environs should form an integral part of the public realm in terms of both design and management. It is important that the siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water. It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside</p> <p>As stated above the Trust are keen to work with you to develop a canal specific section / policy and we would be happy to engage further with you on this matter as the Plan progresses.</p>			
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Q30. Should we have considered alternative options?						
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BROADBAND AND ELECTRONIC COMMUNICATIONS

Q31. Do you think the Preferred Broadband and Electronic Communications is the right approach?						
SC_00 024_A Abbots Langley PC	Abbots Langley Parish Council	Yes	agree		support	Noted No action
SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Broadband and Electronic Communications</p> <p>The county council welcomes these paragraphs within the draft local plan, along with the accompanying policy option that aim to raise awareness of the importance of broadband connections in the district, through the role out of fibreoptic broadband. Access to broadband is a vital component of infrastructure in today's world and it is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience.</p> <p>The LPA should be aware that HCC has been part of the 'Connected Counties' joint partnership since 2014, which is a consortium between HCC, Bucks County Council, Hertfordshire Local Enterprise Partnership and BT that aims to deliver superfast broadband (measured as a minimum of 24Mbps download speed) in areas not commercially covered by BT, Virgin, Sky, Gigaclear and other providers.</p> <p>As the county seeks to become a county with 100% coverage of superfast broadband, new developments in the county were being encouraged to include superfast broadband availability. Whilst superfast broadband is fast enough for most current individual/household needs, the</p>	<ul style="list-style-type: none"> Support and some suggested amendments to the second paragraph this policy: 2) 	Agreed.	Suggested amendment are made to the second paragraph this this policy: 2) All residential, employment and commercial developments should be served by or be capable of being served by super fast <u>full-fibre broadband</u> through the integration of appropriate measures such as open access ducting to industry standards.

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		<p>availability of and demand for data-intensive services such as online video streaming and video calls is increasing and high data demands by many users at one time can push the limits of a superfast broadband connection. To support this growing dependence on and demand for digital services, it is becoming increasingly evident that high capacity internet connections that can support fast download speeds, large amounts of data and many users at one time will be required. The coronavirus pandemic has further highlighted the need for widely available and reliable digital connectivity.</p> <p>Superfast broadband has been mainly delivered by fibre-to-the-cabinet technology, which is a part-fibre, part-copper technology. However, the National Infrastructure Commission concluded in July 2018 that investment should be made in 'full-fibre networks compared to upgrading the existing copper network and the importance of this has been accelerated by the impact of COVID-19. High capacity internet connections whether in the home or office is starting to place an even greater emphasis on the availability of full-fibre to the premise. This has been particularly evident in respect to addressing significant changes in domestic use and the demands of home working, but also contributing to the strategic thinking and planning around the way we work in the future. LPAs and property developers therefore have a pivotal role to play in ensuring they do what they can to 'future-proof' new developments by installing direct fibre access.</p> <p>Preferred Policy Option 30, Broadband and Electronic Communications. In the light of the above, it is suggested that the following amendments are made to the second paragraph this this policy: 2) All residential, employment and commercial developments should be served by or be capable of being served by super-fast <u>full-fibre broadband</u> through the integration of appropriate measures such as open access ducting to industry standards.</p>			
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Q31. Should we have considered alternative options?					
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