

APPENDIX 6 REPRESENTATIONS RECIEVED

REPRESENTATION REFERENCE	REPRESENTOR		REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Northwood Headquarters						
SC_00010_Defence Infrastructure Organisation (MOD)	Defence Infrastructure Organisation (MOD)	No objection – suggest 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>	<ul style="list-style-type: none"> • Requests a specific policy to be included in draft Local Plan • 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. 	<ul style="list-style-type: none"> • Agreed. New section to be added to Local Plan with suggested draft policy 	<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>
Q5. Do you think the Preferred Policy Option for Affordable Housing is the right approach?						
SC_P1_00008_Home Builders Federation	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>12. 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”.</p> <p>13. 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</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 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’ • Refers to governments support for SMEs 	<p>Affordable Housing</p> <ul style="list-style-type: none"> • Noted, however local circumstances and evidence suggests that the need for affordable housing is so acute that a different approach is proposed to that in the NPPF. • The majority of sites allocated are classified as major development and proposed policy will ensure that any minor windfall development contributes to affordable housing where viable. • 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. 	No action

		<p>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.</p> <p>14. 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>16. 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>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</p>	<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. • Viability Assessment • 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"> 1) 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 value – where costs are high will result in sites not 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. 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 	<p>First Homes</p> <ul style="list-style-type: none"> • Interim policy statement issued in relation to the new First Homes requirement and draft policy will be amended to include First Homes requirement following the issue of the Ministerial Statement. • Viability Assessment will follow national guidance and best practice. Viability Assessment will be published alongside Regulation 19 consultation. 	<p>Draft policy to include First Homes requirement</p> <p>No action</p>
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		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. 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.	vehicle charging points, sustainable design and construction, renewable energy etc) 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 	<ul style="list-style-type: none"> Support Noted. Policy will be updated to reflect recent introduction of First Homes 	Draft policy to include First Homes requirement
SC_00029_Hertsmere Borough Council	Hertsmere Borough 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
NSS4		Preferred Policy Option 4 (PPO4), requires development which results in the net gain of one or more dwellings to deliver 40% affordable rent and 10% affordable ownership as well as 10% building regulation M4(3) standard. The policy also states that in most cases, affordable housing provision should be made on site. It is recognised that the affordable housing need established within the LHNA (2020) is acute, the subsequent recommendation within the LHNA is for local authorities to seek to deliver "as much affordable housing as viability allows". We have been unable to locate any viability evidence within the Council's evidence base to support the figures contained within the PPO4. As such, we consider that this policy is unsound as it is not justified. We note that the policy as currently drafted would appear to apply to all dwellings. This would include 'traditional' C3 developments and specialist housing including 'Extra Care' developments (often considered Use Class C2). We have not seen any viability evidence to support this. Specialist housing for older people should be treated differently to standard housing due to their very different viability and operational characteristics. In light of the above, we request that PPO4 is updated to make clear that the provision of affordable housing will not be sought in the case of Extra Care development.	<ul style="list-style-type: none"> No viability figures in the plan to support affordable housing figures, therefore is considered to be unsound; Would apply to all forms of development, Policy should exclude Extra Care housing 	<ul style="list-style-type: none"> The plan is at an early stage, viability will be tested prior to Regulation 19. The need for affordable housing in the district is such that the policy seeks contributions from all new development proposals 	No Action
NSS7		Policy Option 4(4) confirms that the approach towards supporting affordable housing development in Sarratt is limited to the provision of Rural Exception Sites. Bedmond is also listed as a village where Rural Exception Sites will be supported, albeit this appears inconsistent with the additional opportunities for growth provided as a result of the proposals to inset the settlement from the Green Belt. This part of the Council's proposed policy approach provides only general direction and does not seek to specifically support opportunities for growth in the sustainable settlement of Sarratt. The policy effectively duplicates paragraph 149(f) of the Framework without making provision for specific sites and with the additional qualification for schemes to be located ' <i>immediately adjacent to the village core</i> '. The Council's proposed approach is not justified, not effective and not positively prepared. Given the acuteness of the Council's housing needs, an approach that specifically supports our client's site as an opportunity for residential development in accordance with national policy is required.	<ul style="list-style-type: none"> Approach to support affordable housing is limited to Rural Exception policy in a sustainable location of Sarratt 	<ul style="list-style-type: none"> Sarratt is a village washed over by Green Belt and it is considered appropriate that a Rural Exception policy applies in accordance with national planning policy 	No Action
NSS9		Draft Preferred Policy Option 4 (Affordable House) states that there is an "identified pressing need for affordable housing in the district" (1). When outlining the use of Rural Exception Sites, part (4) of the Preferred Policy Option 4 states: "Small-scale proposals delivering 100% affordable housing in perpetuity within and immediately adjacent to the village core areas of Bedmond and Sarratt may be supported within the Green Belt where these are evidenced to provide affordable housing to meet identified local community needs. A minor degree of market housing may be acceptable where it is required to support the delivery of affordable housing on the site". This revised wording moves away from the allocation of Rural Exception Sites, which is supported by Aldenham Residential. This more flexible approach will assist in allowing windfall Rural Exception Sites to come forward and contribute new affordable homes towards the Council's extensive need. Notwithstanding this support for the more flexible approach to windfall sites, the wording "within or immediately adjacent to the village core areas of Bedmond or Sarrat" is maintained at point 4 of the	<ul style="list-style-type: none"> General agreement with the approach; Wording "<i>within or immediately adjacent to the village core areas of Bedmond or Sarrat</i>" is maintained at point 4 of the draft Preferred Policy Option 4. Not supported as it is considered to cancel out the flexibility created through the omission of allocating Rural Exception Sites. Reviewing the evidence base there is no known justification for this; Will result in an under-delivery of affordable new homes; Replace the wording to the effect that an appropriate assessments of a site's suitability is required, looking at a number of criteria; 	The rural exception site is drafted in accordance with the NPPF. Planning Application will be considered on a case by case basis. The suggested approach would result in isolated development contrary to NPPF paragraph 80.	No action

		<p>draft Preferred Policy Option 4. This is not supported by Aldenham Residential and is considered to cancel out the flexibility created through the omission of allocating Rural Exception Sites. On review of the Council's emerging evidence base there is no known justification for the continued inclusion of this wording. The consequence of adopting such a policy approach is likely to result in the current outcome; an under-delivery of affordable new homes coming forward. This is explained in more detail in the next section. Within the context of National Policy, the NPPF makes no reference to the need for Rural Exception Sites to be "within or immediately adjacent to" the core of settlements, villages or any specific locations. The inclusion of such wording is considered inconsistent with national planning policy, a requirement of paragraph 35 of the NPPF and the test of soundness.</p> <p>It is noted that the assessment of the local affordable housing need is an important criterion in assessing the suitability of a Rural Exception Site, as currently worded in adopted policy. The retention of this requirement is required by national policy and is supported. However, it is promoted that the policy be made more flexible by removing the geographic limitation as it is currently worded. Aldenham Residential propose that "within or immediately adjacent to the village core areas of Bedmond and Sarratt may be supported..." is replaced with wording to the effect that an appropriate assessment of a site's suitability is required. The criteria for the suitability of sites should be based on the core requirement of sustainable locations. Model criteria, for example, could include requirements such as:</p> <ul style="list-style-type: none"> • Sustainable location; • Good design; • Appropriate level of access; • Landscape and ecology considerations; • Excellent amenity standards. <p>This would give the Council the ability to control development and even deliver a better standard of affordable housing development than can sometimes be delivered by mixed-tenure schemes, on a site-by-site basis. The significant gain to the Council would be the freeing up of potential sites to come forward and be delivered therefore providing much need affordable housing.</p>	<ul style="list-style-type: none"> • This would give the Council the ability to control development and have a better standard of affordable housing. 		
NSS11		<p>The significant need for new affordable homes and associated affordability issues facing the District is not in question. We therefore have no objection to the aims of the policy or the overall affordable housing target (of 50%) however we do have some comments around the deliverability of the policy particularly how it sits within the context of the recently introduced 'First Homes' policy by the Government.</p> <p>In May 2021, the PPG was updated to introduce 'First Homes', new homes that would be sold at a minimum 30% below their full market rate (which would be retained in perpetuity). In planning policy terms it is stated that a minimum of 25% of new affordable homes should be 'First Homes' however it is not clear how this requirement would affect the Council's preferred tenure split set out in Policy 4. On this basis, we consider it necessary for the Council to update this preferred policy.</p> <p>In addition and notwithstanding the strength of the local housing market, the inclusion of such a high affordable housing target applicable for any development involving a net gain in new homes will invariably affect the viability of smaller sites and those involving redevelopment of previously development land for which there might be associated abnormal costs. We appreciate that the proposed policy takes on board scheme viability, however, it is stated that a reduced provision will only be accepted in exceptional circumstances suggesting that this would be a high bar to pass. As such, this policy approach has the potential to be counterproductive, adversely affecting the delivery of smaller sites.</p> <p>We note that criterion 4 seeks to permit small-scale proposals delivering 100% affordable housing within and immediately adjacent to the village core areas of Bedmond and Sarratt to meet local identified need where a minor degree (not defined) of market housing, to facilitate delivery, may also be acceptable. The supporting text (paragraphs 4.55/.56) states that such an approach would be consistent with NPPF policy.</p> <p>On the face of it, this part of the policy appears to proactively support the delivery of such housing in these locations. This exception, however, has been part of national policy since the NPPF was first published in 2012 and in this time housing delivery in Sarratt and Bedmond has been minimal whilst at the same time house prices continue to rise as illustrated in the tables below:</p> <p>As is evident by the above data, and information contained within the Local Plan, there is an increasing affordability issue across the whole of the District which has worsened since 2012. We therefore consider that the Council needs to take a more proactive approach to housing delivery in and around both defined villages of the District, particularly around affordable housing.</p> <p>We note that the Local Plan proposed to allocate three sites around Bedmond that in total would deliver 153 new homes (site refs: CFS10, CFS56 & ACFS9e) which, based on the current proposed affordable housing policy, would deliver approximately 76 new affordable homes. This provision would make a meaningful contribution to meeting local need and illustrates that, in principle, the defined villages represent appropriate locations for new housing. Unlike Bedmond, no new housing allocations in Sarratt? are proposed which is presumably due to the findings of the Council's Green Belt assessment which did not recommend to inset Sarratt from the Green Belt (unlike Bedmond). This is a matter we return to within section 5.</p> <p>Notwithstanding the proposed allocations at Bedmond, as a result of a lack of supply for a number of years housing in these locations are increasingly out of reach for a large number of people. Proposing</p>	<ul style="list-style-type: none"> • Do not question targets, but question deliverability of the policy; • High target will affect viability of the smaller sites and PDL Sites; • In respect to affordable housing delivery, we consider that the preferred policy needs to be amended to properly take into account 'First Homes', In addition the policy should provide greater flexibility for smaller sites by excluding the requirement for developments of 10 or less homes to deliver affordable housing and the Council needs to be more proactive in identifying opportunities for the delivery of affordable housing in and around the existing defined villages within the District. 	<ul style="list-style-type: none"> • Policy allows for viability to be considered. • First Homes policy to be included 	<p>First Homes policy to be included</p>

		<p>new allocations at both Bedmond and Sarratt will assist the Council in meeting a number of strategic objectives set out within Policy 1 (e.g. criterions g and j). We set out within section 4 why we consider land within the control of the Burlington Property Group is well placed to contribute to meeting this high need for new homes in this part of the District</p> <p>In summary, in respect to affordable housing delivery, we consider that the preferred policy needs to be amended to properly take into account 'First Homes'. In addition the policy should provide greater flexibility for smaller sites by excluding the requirement for developments of 10 or less homes to deliver affordable housing and the Council needs to be more proactive in identifying opportunities for the delivery of affordable housing in and around the existing defined villages within the District.</p>			
NSS17		<p>The requirement for all developments resulting in a net gain of one dwelling to provide affordable housing is not supported. The level of contributions sought by the Council towards affordable housing on small sites presents a barrier to development and makes the delivery of small and medium sized sites unviable.</p> <p>This is particularly the case of self-build schemes. It is DLP's view that proposals for self-build schemes should not have to make financial contributions towards affordable housing. Self-builders who have demonstrated their intention to live in their new dwelling for at least 3 years by applying for a self-build CIL exemption should not be liable for an Affordable Housing contribution. Government policy states that a CIL contribution instead of a S106 Affordable Housing contribution is the more appropriate levy on schemes for 10 dwellings or fewer. An insistence on an Affordable Housing contribution for a single self-build for owner occupation is inconsistent with government policy and the NPPF.</p> <p>The approach set out in the draft local plan, in DLP's view, is not consistent with the Framework, which is clear that contributions should not be sought from developments of less than 10 units. Therefore, it is DLP's view that the threshold should be amended so it is consistent with the Framework and not simply apply it to all developments providing a net gain of one dwelling.</p>	<ul style="list-style-type: none"> Requirement for all developments resulting in a net gain of one dwelling to provide affordable housing is not supported; Level of contributions sought by the Council towards affordable housing on small sites presents a barrier to development and makes the delivery of small and medium sized sites unviable. This is particularly the case with self-build schemes and should not have to make a contribution; Not consistent with the NPPF, which is clear that contributions should not be sought from developments of less than 10 units. 	<ul style="list-style-type: none"> Noted, however local circumstances and evidence suggests that the need for affordable housing is so acute that a different approach is proposed to that in the NPPF. 	No action
PL_00 009_C FS13		<p>there is, in particular, an acute need for affordable housing in Three Rivers and the lack of such housing stock is causing social and economic issues for the district. The PPO identifies a net need of 373 affordable houses per annum (paragraph 4.47) between 2017 and 2036. There is delivery information from the MHCLG Live Tables that shows 'Total additional affordable dwellings' by district (Live Table 1008C). This shows that between 2017 and 20202 the Council delivered just 120 affordable homes against a need for 1,119 affordable homes³. Consequently just a few years into the plan period and the Council is already 1,000 affordable homes short of its need. With an annual housing requirement of 546 dpa and an affordable housing target of 40%⁴ the most the Council could hope to deliver is 4,368 affordable units. Compare this to the need for 7,460 over the plan period and it is clear that the plan can be expected to significantly under-deliver on its affordable housing need by more than 3,000 units.</p> <p>Our client recognises the significant need for affordable housing in Three Rivers District and considers that the Council's Local Plan should look to maximise the delivery of affordable housing as far as it is possible to do so (within the scope of economic viability). Our client's Sites for Potential Allocation (CFS13) is capable of making a contribution towards affordable housing delivery in the district.</p>	<ul style="list-style-type: none"> Under-delivery of affordable homes against need. The Plan will significantly under-deliver on its affordable housing need by more than 3,000 units if continuing with 546 dpa (i.e. continuing with overall housing shortfall). 	<ul style="list-style-type: none"> Noted and agreed. The LNHA (2020) identifies a notable need for affordable housing and Preferred Policy Option 4 Affordable Housing seeks to meet this need. The Whole Plan Viability Assessment will assess Preferred Policy Option 4 to ensure that its requirements can be applied. The Preferred Policy Option 4 Affordable Housing is also subject to viability and states that "Affordable housing requirements that have been determined on the basis of viability and site-specific viability information seeking to justify an alternative level or mix of affordable housing will therefore only be accepted in exceptional cases". 	No action
PL_00 002_A CFS8b		<p>It is not agreed that the Preferred Policy Option is the right approach. This is because affordable housing contributions will be sought on all new developments resulting in a net gain of one or more dwellings.</p> <p>The NPPF is clear at paragraph 63 that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. A major development is 10 or more units. Therefore, only units of 10 units or more should make an affordable housing contribution.</p> <p>The approach proposed is therefore not in accordance with national planning policy and this renders the Local Plan unsound. An affordable housing contribution should only be sought on major developments.</p> <p>It is also considered that the requirement for 10% of affordable housing to meet the Building Regulations M4(3) standard (wheelchair user dwellings) should be absorbed within the overall requirements set out in Preferred Policy Option 6. i.e. the 10% affordable housing requirement should be incorporated within the standards of the wider site.</p>	<ul style="list-style-type: none"> Requirement for affordable housing contributions on minor sites is contrary to national policy and is unsound. The requirement for M4(3) wheelchair user dwellings should apply to all standards of housing 	<ul style="list-style-type: none"> 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 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 	No action

					<p>Threshold document, published at: https://www.threerivers.gov.uk/egcl-page/making-an-application</p> <ul style="list-style-type: none"> The PPG states that Local Plan policies for wheelchair accessible homes M4(3) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. As such, it is considered that the requirement for M4(3) dwellings can only be applied to affordable housing. 	
PL_00 004_C FS1		<p>My clients are supportive of the affordable housing exception policy as stated but such rural exception sites do not need to be immediately adjacent to a settlement boundary to be acceptable and meet very important needs. Therefore the wording in option 8 should change with new wording in bold: “Small-scale proposals delivering 100% affordable housing in perpetuity within and immediately adjacent with reasonable proximity to the village core areas of Bedmond and Sarratt and other rural settlements/hamlets may be supported within the Green Belt where these are evidenced to provide affordable housing to meet identified local community needs. A minor degree of market housing may be acceptable where it is required to support the delivery of affordable housing on the site’.</p> <p>The wording proposed is too restrictive in comparison to paragraph 149 e) of the NPPF and the exception there as well as case law.</p>	<ul style="list-style-type: none"> Rural Exception Sites Policy is too restrictive and should be expanded to allow for rural exception sites ‘within reasonable proximity’ to villages and other rural settlements/hamlets. 	<ul style="list-style-type: none"> Paragraph 80 of the NPPF sets out that planning policies should avoid the development of isolated homes in the countryside unless certain circumstances apply. The provision of rural exception sites are not one of these circumstances. Given the significant extent of rural land in Three Rivers and large number of rural settlements and hamlets, it is considered that the expansion of the draft policy to allow rural exception sites within proximity of all the rural settlements/hamlets would result in sprawl and the development of isolated homes. It is therefore not proposed to amend the policy. 	No action	
PL_00 014_C FS22		<p>It is not considered that the preferred policy option for affordable housing is the right approach. This is because affordable housing contributions will be sought on all new developments resulting in a net gain of one or more dwellings.</p> <p>The NPPF is clear at paragraph 63 that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. A major development is 10 or more units. Therefore, only units of 10 units or more should make an affordable housing contribution.</p> <p>The Lambeth Local Plan confirms that TRDC’s proposed approach is unsound. Lambeth had advocated a policy which sought the provision of affordable housing or tariff style contributions on developments of 10 units or less (Appendix 3). However, in concluding that the Draft Revised Local Plan meets all relevant legal requirements and provides an appropriate basis for planning, the Inspector recommended the adoption of the Local Plan. However, this was subject to main modifications which included the removal of affordable housing contributions or tariff style contributions of 10 dwellings or less, given this requirement did not reflect National Planning Policy. The Examiner’s report states:</p> <p>“In addition to the economic and viability arguments cited above, national policy states that the provision of AH should not be sought for residential developments that are not major developments. Accordingly, the Plan requires modification to ensure it applies to sites of 10 dwellings and above, in line with national policy”.</p> <p>The approach proposed is therefore not in accordance with national planning policy and this renders the Local Plan unsound. An affordable housing contribution should only be sought on major developments.</p> <p>It is also considered that the requirement for 10% of affordable housing to meet the Building Regulations M4(3) standard (wheelchair user dwellings) should be absorbed within the overall requirements set out in Preferred Policy Option 6. i.e. the 10% affordable housing requirement should be incorporated within the standards of the wider site</p>	<ul style="list-style-type: none"> Requirement for affordable housing contributions on minor sites is contrary to national policy and is unsound. 	<ul style="list-style-type: none"> 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 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/egcl-page/making-an-application The PPG states that Local Plan policies for wheelchair accessible homes M4(3) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. As such, it is considered that the requirement for M4(3) dwellings can only be applied to affordable housing. 	No action	
PL_00 005_C FS3 CFS18 b CFS56		<p>2.19 The proposed policy seeks the provision of 50% Affordable Housing (comprising 40% Affordable/Social Rent / 10% Affordable Ownership). In addition, the emerging policy requires 10% of Affordable Housing to meet Building Regulations (M4(3) standard (wheelchair user dwellings).</p> <p>2.20 As highlighted above, there exists a significant need for Affordable homes in TRDC given the ongoing affordability crisis and whilst the proposed 50% Affordable Housing provision is high, this is a consequence of significant under-provision of housing historically and the resulting average house prices in the district.</p>				

			2.21 It is important that Affordable Housing requirements do not adversely impact the ability to deliver strategic development sites, particularly at this stage when full infrastructure costs are as yet unknown. No viability assessment has yet been undertaken but will be necessary to ensure Local Plan allocations are realistic and deliverable based on standard site/typologies as a minimum in line with National Planning Policy Guidance. Whilst not anticipated to be required, the policy is nonetheless supported whereby flexibility is built-in through viability assessment to ensure appropriate and financially viable levels of Affordable housing are delivered according to the ability of an individual site to provide Affordable housing when factoring in wider ranging infrastructure requirements applicable to any particular site.	<ul style="list-style-type: none"> Important that Affordable Housing requirements do not adversely impact the ability to deliver strategic development sites, particularly at this stage when full infrastructure costs are as yet unknown. Viability Assessment will need to ensure Local Plan allocations are realistic and deliverable. Flexibility through the use of viability assessments to ensure financially viable levels of affordable housing are delivered is supported. 	<ul style="list-style-type: none"> Noted. It is agreed that the Whole Plan Viability Assessment will need to assess Preferred Policy Option 4 to ensure that its requirements can be applied and sites still viably be delivered. The Preferred Policy Option 4 Affordable Housing does incorporate flexibility at planning application stage as it states: "Affordable housing requirements that have been determined on the basis of viability and site-specific viability information seeking to justify an alternative level or mix of affordable housing will therefore only be accepted in exceptional cases". 	
PL_00 021_C FS53			Flahive recognises that the need for additional affordable housing in the District is acute, although considers that this situation is partially due to historic under delivery. Flahive therefore supports the principle of the preferred policy option in seeking the delivery of 50% of new homes as affordable, although considers that the requirement should be based on proportionate evidence which demonstrates that this amount of affordable housing would not result in developments being financially unviable. Failure to do so could result in developments being financially unviable, which would have negative implications for the delivery of new homes in the District, and may result in the Local Plan being found 'unsound'.	<ul style="list-style-type: none"> Acute affordable housing need is partially due to historic under-delivery. Support principle of seeking 50% of new homes as affordable, but considers the requirement should be based on evidence that demonstrates this would not result in developments being unviable. 	<ul style="list-style-type: none"> Noted. The Whole Plan Viability Assessment will need to assess Preferred Policy Option 4 to ensure that its requirements can be applied and sites still viably be delivered. The Preferred Policy Option 4 Affordable Housing does incorporate flexibility at planning application stage as it states: "Affordable housing requirements that have been determined on the basis of viability and site-specific viability information seeking to justify an alternative level or mix of affordable housing will therefore only be accepted in exceptional cases". 	No action
PL_00 037			Vacant Building Credit Part 11 of Preferred Policy Option 4 covers Vacant Building Credit, and states that this can only be used in demonstrated exceptional circumstances. There is however no definition of what constitutes 'exception circumstances'.	<ul style="list-style-type: none"> Under Vacant Building Credit part of the policy, there is no definition of 'exceptional circumstances' and when VBC may be appropriate 	<ul style="list-style-type: none"> Noted. It is considered that the criteria listed under the Vacant Building Credit policy is sufficient for robust assessment could be made to ensure that buildings/sites were not being made vacant in order to benefit from VBC as part of redevelopment. If a proposal were to meet criteria a-e as listed in the policy it is considered that this would be an exceptional circumstance in itself. 	No action

P1_00 001	No	80% of market value in TRDC cannot be described as "affordable" under any circumstances. Anyone who can afford them must have access to other wealth (such as the "Bank of Mum and Dad"). Why are we restricting home ownership to only those who are already part of wealthy families?	<ul style="list-style-type: none"> 80% of market value is not affordable 	Noted	None
P1_00 002	Yes	This is correct, but the design guidance as set out is inadequate and must be enhanced, be compulsory and include a restriction on buildings over 4 storeys high.	<ul style="list-style-type: none"> Agree 	Noted	None
P1_00 003y		Affordable housing is needed	<ul style="list-style-type: none"> Need Affordable Housing 	Noted	None
P1_00 005	Yes	I agree that the plan must include houses that meet the Building Regulations M4(3) standard (wheelchair user dwellings) as per the requirements of Preferred Policy Option 6 on Accessible and Adaptable dwellings so that as the population becomes older and less mobile there are houses in in the area which would be suitable for them to move to.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 006	Yes	To continue as a proper community, each area within the district provide a cross section of types and tenure of housing! We don't want new developments to solely consist of large detached houses which only attract more an affluent population! It is necessary that a proper range of homes is made available and local youngsters can continue living in the area in which they grew up and not being forced to live further away and commute to work here. We owe it to future generations to provide adequate housing for all.	<ul style="list-style-type: none"> Agree with approach on mixed tenures 	Noted	None
P1_00 014	Yes	One assumes that all the necessary considerations have been taken into account.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 017	No	Define "affordable". Since when has a £380k apartments South Oxhey been affordable? Great words but no action.	<ul style="list-style-type: none"> Need to define what 'affordable is', £380k apartments not affordable 	Noted	None
P1_00 019_	Yes		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 020	Yes	Keeping housing options for rental housing is a better longer term solution to housing shortage.	<ul style="list-style-type: none"> Agree with approach. Keeping housing options for rental housing is a better long term solution 	Noted	None
P1_00 021	Yes	Much needed	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 023	No	We disagree that expanding the rental sector allows for more affordable housing as private landlords cannot be held to maintaining low rents over time. This restricts developments to housing	<ul style="list-style-type: none"> Disagree with long term rental approach. Landlords cannot be held to 	Noted	None

			association development only. Given that significant proportion of TRD is on the London Underground network, comparisons with local London housing may be more appropriate.	low rents long term and comparisons with London housing is considered more appropriate		
P1_00_024	No	I would like opportunities for young people and families to be able to own their homes rather than rent them. Consideration should be given to those on low incomes to give them the chance to get on the housing ladder. I think when homes are owned, people tend to take more pride in them.	• Opportunities for young people and families to get on property ladder are needed.	Noted		None
P1_00_025	No	The approach will have a negative impact on local amenities with increase in crime, rubbish etc.	• Will have a negative impact on local amenities and lead to increase in crime	Noted		None
P1_00_026	No	Essential workers not considered or how Essential workers should be defined	• Essential workers not considered/defined	Noted		None
P1_00_027	No	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 for small developments to encourage development of small in-fill sites that can contribute to the overall numbers of new homes.	• Applying standard to all developments penalises smaller developers, need a threshold and larger developers to provide more affordable housing.	Noted		None
P1_00_032	Yes	The provision of housing for affordable rent and low cost purchase is vital.	• Agree with approach	Noted		None
P1_00_033	Yes	Hopefully this will increase the overall number of social housing	• Agree with approach	Noted		None
P1_00_034	Yes	However many dwellings may be approved a mix is appropriate	• Agree with approach	Noted		None
P1_00_038	Yes	As long as it meets the needs of the population not the developers	• Needs to meet the needs of the population not developer	Noted		None
P1_00_040	No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	• Do not develop Green Belt Land		The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00_041	Yes	As long as this approach is always followed. I am concerned that there might be a number of small developments of 9 or less houses, which could avoid having to provide affordable housing. There needs to be measures in place to prevent this from happening.	• As long as applies to all developments and smaller developments of 9 or less do not claim exemption	Noted		None
P1_00_045	Yes	No Comment	• Agree with approach	Noted		None
P1_00_046	Yes	Affordable housing is needed across the district	• Agree with approach	Noted		None
P1_00_047	Yes	This policy is correct; as long as the new homes are not built on green field sites or on the Green Belt, which could have a devastating impact on the local environment and biodiversity.	• Agree with approach as long as not developed on Green Belt Land or Greenfield Land		The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18	None

					consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	
P1_00 048_	No	Affordable housing in small village locations should be avoided.		• No affordable housing in small villages	Noted	None
P1_00 049	No	More affordable housing is needed if we want young people to stay in the area.		• Need more affordable housing if want young people to stay	Noted	None
P1_00 050_	Yes	It is critical to build housing that enables younger families and people without families to get on the ladder.		• Agree with approach as allows younger people and families in the area	Noted	None
P1_00 053	Yes			• Agree with approach	Noted	None
P1_00 054	Yes	Affordable housing should be high priority		• Agree with approach	Noted	None
P1_00 055	Yes	Affordable homes should always be suited to the area and not easily distinguished from other homes		• Agree with approach	Noted	None
P1_00 056	Yes	Balanced approach, but needs to be enforced in practice, to avoid developers subsequently withdrawing their approved proposals for affordable housing for their own economic gain.		• Agree with balanced approach but needs to be enforced	Noted	None
P1_00 057	Yes	But not in this area.		• Not in this area	Noted	None
P1_00 063	No	The only kind of permitted new development should be affordable housing.		• Affordable housing should only be built	Noted	None
P1_00 064	No	We should develop flat complexes with 30+ dwellings.		• Develop flat complexes with 30+ dwellings	Noted	None
P1_00 066	No	As I am against this in principle, as I believe the price is the price and if you cannot afford to live in an area at a given time then find ways of doing this		• Against, if unaffordable then unaffordable	Noted	None
P1_00 068_	No	I see most of this clause carefully worded to reinstate Council Housing under a different name. You have absolutely NO REMIT to bring politics into Large Planning.		• No remit to bring politics into large planning	Noted	None
P1_00 069	No			• Do not agree with approach but no comments made	Noted	None
P1_00 071	Yes	My answer still hinges upon the housing requirements being re-presented with a lower overall number of new dwellings. I have not difficulty with the plans including more affordable housing, and a mix of types of accommodation - but design is crucial, it's needs to blend in with and support to look of local areas.		• Answer depends on lower housing figures being provided. Design is crucial to blend in with area	Noted	None
P1_00 074	Not Stated	I can understand the approach but I find it hard to believe that developers can actually deliver affordable houses "being physically and visually indistinguishable from market units".		• Developers cannot deliver affordable housing which is physically and visibly indistinguishable from market units.	Noted	None
P1_00 076	No	Until an average earner, teachers, civil servants etc can afford a home without help from parents or anyone else, affordable housing is a meaningless term.		• Until average earner can afford a property will be a meaningless term.	Noted	None
P1_00 078	Yes	Allow balanced communities as long as existing home owners are not blighted.		• Agree with approach as long as existing home owners are not blighted	Noted	None
P1_00 080_	No	No more affordable housing in the district		• No more affordable housing	Noted	None
P1_00 084	Yes	We understand a section of new homes would be allocated to affordable housing.		• Agree with approach	Noted	None
P1_00 086	Yes	That under no circumstances should any properties be made available for buy to let. There are way too many of these already and landlords are cashing in on this. Rent consistently goes up but wages don't. speaking from experience here		• No properties should be buy to let as no rent controls	Noted	None
P1_00 088	Yes	Makes Sense		• Agree with approach	Noted	None
P1_00 089	Yes	Affordable housing is required for younger generations but not to the detriment of the community or Chorleywood as a whole. We have buy to let flats in Green Street and other planning proposals which could see a problem with local resident's children attending SCD school as might be out of the 'catchment' area, also it alters the area with different types of people who maybe perhaps don't care for the environment or village as older generations.		• Affordable housing is needed but not detriment of community Chorleywood; • Means there is a strain on infrastructure	Noted	None
P1_00 096	No	Should create another new town like Hemel Hempstead / Stevenage, the national shortage of "affordable housing" was created by the sell-off of council stocks in the 80s and requires much larger scale solutions		• Create another town like Hemel Hempstead/ Stevenage	Noted	None
P1_00 097	Yes	Need to consider a range of affordable housing for various different needs.		• Agree with approach	Noted	None
P1_00 098	Yes	Affordable housing is possible in a sustainable way – none of what has been built in recent years is that. Consider community shared spaces.		• Affordable housing is possible in a sustainable way but none of what has been built recently is that	Noted	None
P1_00 099	Yes	We need more affordable housing		• Agree with approach	Noted	None
P1_00 101	Yes	The lack of affordable social housing in the district needs to be rectified as a priority		• Agree with approach – Need to get affordable housing in place.	Noted	None

P1_00 102	No	More than 10% of dwellings should be set aside for affordable home ownership, with perhaps some housing association part ownership schemes. Developers should not, under any circumstances, be permitted to avoid building the correct quota of affordable housing by paying a levy instead.	<ul style="list-style-type: none"> More than 10% of dwellings should be set aside for affordable homes; Developers must provide quota of houses under all circumstances 	Noted	None
P1_00 103	Yes	I agree that some affordable housing should be built in any new development	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 107	No	Affordability shouldn't be down to the building cost of the properties or the number of buildings being built. Properties should be designed on the basis of need, and social rents fixed at price that people can realistically afford.	<ul style="list-style-type: none"> Properties should be built based on needs not design and social rents should be fixed 	Noted	None
P1_00 108	Yes	I thought this was a government requirement	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 110	Yes	Yes. We support PPO4 subject to up to date figures being used and (4) rural exception sites being changed to limit the number of market dwellings to the minimum number essential to fund the affordable housing units, and to require the supporting financial evidence for this to be provided.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 112	Yes	I'm not sure this works. How has it worked in other areas? Some of the stories I've been told by friends in that type of development say that there's often issues, they are unhappy where they live and the value of their property has not kept up with similar properties elsewhere.	<ul style="list-style-type: none"> Concerns that the value of properties have not kept up with similar properties elsewhere 	Property values are not a planning issue	None
P1_00 113	Yes	no reason	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 114	No	Remove or reduce the rural exception where this allow or enables building on, or expansion into the Greenbelt. Once encroachment starts it becomes a continuous opportunity for incremental expansion	<ul style="list-style-type: none"> Remove the rural exception which allows expansion in the green belt. 	Noted	None
P1_00 115	Yes	The provision of more affordable housing, especially at social rents, is a priority for the area.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 116	No	Home ownership has overtaken rented property in terms of desirability over recent years and a greater proportion of affordable ownership should have been proposed.	<ul style="list-style-type: none"> Greater proportion of affordable ownership should be proposed 	Noted	None
P1_00 119	No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Land is sanctuary for wildlife 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00 120	Yes	It is right as long as the needs of the existing residents and local families are prioritised and protected.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 121	No	Forget the greenbelt - find alternatives	<ul style="list-style-type: none"> Do not develop Green Belt 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 123	Yes	it is in line with government policies, but I would like to see the figure of 10% increased and I would like to see some genuine social housing being built. Council houses, for example.	<ul style="list-style-type: none"> Agree with approach but figure needs to be increased from 10% 	Noted	None
P1_00 127	No	You need to encourage a free market and what is needed in the area and not such a focus on affordable options	<ul style="list-style-type: none"> Need to encourage free market in the area and not focus on affordable housing 	Noted	None
P1_00 130	No	It leads to overpopulated areas.	<ul style="list-style-type: none"> Will lead to overpopulation 	Noted	None
P1_00 131	No	What's 'Policy xx Housing Mix'? Why are just Sarratt and Bedmond considered 'Rural Exception Sites'? More emphasis on 'affordable to rent' rather than 'affordable home ownership', please. That's of far more use to those on restricted incomes in the long run.	<ul style="list-style-type: none"> More emphasis on affordable to rent than affordable home ownership 	Noted	None

P1_00 132	Yes	needs to be balanced approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 135	Yes	The proportion of affordable housing proposed is 40% - 50% of the number of dwellings (40% for rent and an additional 10% for ownership in developments of 10 or more dwellings) It is stated that the need for affordable housing for rent is equivalent to 60% of the district's total housing requirement under the standard methodology (and a higher percentage if the area delivers a lower number of new housing). It is not clear why a target of 40% has been set. The affordable housing requirement must be increased in line with the need. There is a very serious problem in Three Rivers in that developers are regularly submitting Viability Assessments to show the amount of affordable housing requirement will make the development not profitable enough to be viable. It is hard to believe, in a district that has one of the highest house prices in the country, that developers are unable to make a viable profit on building new homes. This must be challenged in the strongest possible terms. The criteria defining 'exceptional cases' for lowering the affordable housing contribution needs further interrogation and explanation. Every power should be used to resist the reduction of affordable housing. 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.	<ul style="list-style-type: none"> Not clear why a target of 40% has been set; At least 25% of affordable homes should be wheelchair accessible 	Noted	None
P1_00 138	Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 140	Yes	Sensible reasons	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 144	No	High-rise should be the preferred way forward	<ul style="list-style-type: none"> High rise should be the way forward 	Noted	None
P1_00 147	No	In general the policy is fine however you need to do more to directly support key workers supporting essential health and community services. You should directly consult this group to better understand their working lives	<ul style="list-style-type: none"> Need to be more direct at addressing key workers housing 	Noted	None
P1_00 148	Yes	Balance is important to allow all income levels to co-exist	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 150	No	There is clearly an acute need for affordable housing in Three Rivers. The high demand for housing is generated by people moving out from Greater London. However, in both Preferred Policy Option 4 and the supporting text, the Council fails to acknowledge the real need, demands and preferences in Three Rivers for social housing and starter homes, which should be income-related. The definition of 'affordable' housing is 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 for local people. There could be more flexibility with regards to housing options, for instance, Community Land Trusts. The possible role of mobile home sites and houseboats is also not mentioned.	<ul style="list-style-type: none"> Council in supporting text does not acknowledge the real need, demands and needs for social housing; Need more flexibility with regards to housing options. 	Noted	None
P1_00 151	Yes	Many younger people have to move away from the area to find housing, meaning the average age of residents is rising. This is not good for the future of the area.	<ul style="list-style-type: none"> Younger people are moving away from area due to high house prices 	Noted	None
P1_00 154	Yes	<p>22. Having studied evidence provided by the LHNA for South West Hertfordshire, the Associations agree that there is an acute need for affordable housing in Three Rivers. The high demand for housing, quoted in paragraph 2.25, is generated by people moving out from Greater London. In both Preferred Policy Option 4 and the supporting text, however, the Council fails to acknowledge the real need, demands and preferences in Three Rivers for social housing and starter homes, which should be income-related. 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. There could be more flexibility with regards to housing options, for instance, Community Land Trusts. The possible role of mobile home sites and houseboats is also not mentioned. Paragraph 2.5 refers to "a 46% increase in households over 65 by 2036." The Policy Option should address this, with cross-referencing to social policies.</p> <p>23. Nevertheless, the Associations are in general support for the suite of policies contained under Preferred Policy Option 4 under paragraphs (1) – (4). Departure from the NPPF 2021 (paragraph 63) is noted, but the Associations agree that the local circumstances in the District mean that smaller sites (of less than 10 dwellings) will have a crucial role in the delivery of affordable housing.</p> <p>24. The Associations note the policy on rural exceptions sites, as set out in paragraph 4 of Preferred Policy Option 4. It is suggested that the evidence for these types of developments should arise from the Neighbourhood Plans for Abbots Langley (which includes Bedmond and parts of Kings Langley) and Sarratt. As Neighbourhood Plans are prepared in direct consultation with local communities, these would provide more specific justification for departure from Green Belt policies.</p> <p>25. It is noted that the policy in paragraph 4 refers to both Bedmond and Sarratt, yet the supporting text (paragraph 4.56) refers only to the latter. Elsewhere, in Part 2 Sites for Potential Allocation, the Council proposes to remove and inset Bedmond from the Green Belt. The Associations strongly oppose this proposal and support the detailed statement which has been submitted by the Bedmond Residents' Association in response to this consultation. Thus, the reference to Bedmond should be retained in the policy and inserted into the supporting text.</p> <p>26. With regards to the mode and delivery of affordable housing, the Associations question whether the mechanism for commuted sums, referred to in sub-paragraph (7), is appropriate. 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"</p>	<ul style="list-style-type: none"> Agree there is a need for affordable housing; Possible role of mobile home sites and houseboats are not mentioned; Para 2.5 refers to a 46% increase in households over 65 by 2036 but policy does not address this; Smaller sites less than 10 dwellings will have a crucial role in delivery of affordable housing; 	Noted	

			approach, with full publication of calculations of affordable housing on individual sites. For an example of good practice, the Council is referred to The London Plan 2021 and policies H4 and H5 on affordable housing. The London approach to viability was underpinned by the earlier publication of the Mayor's Affordable Housing and Viability SPG. In that document, if 40% of housing were to be provided on a site, then a viability statement would not be required (in the London Plan 2021, this is now 50%).			
P1_00 155	Yes	I do think this is the right approach on paper but don't believe that this is how it ultimately turns out in reality	• Agree with approach but does not turn into reality.	Noted		None
P1_00 157	No	Affordable housing should be just that - affordable! That can only be the case if it is income-related, especially in a high cost area such as Three Rivers. For young people in a community, they will be forced to move to a new, more affordable area, as they won't be able to stay where they have grown up.	• Affordable housing needs to be affordable	Noted		None
P1_00 162	Yes	Affordable housing has been ignored for too long and it is now extremely difficult for many young people to buy a house. This would be a good way out of this problem to provide local homes for local people.	• Agree with approach	Noted		None
P1_00 163	Yes	For the reasons given	• Agree with approach	Noted		None
P1_00 164	Yes	We certainly need affordable housing, but see my previously made point - land costs in TRDC will make housing unaffordable to many people unless the land is provided at well below the current market value.	• Agree with approach	Noted		None
P1_00 166	No	I do not think you should build on green belt land	• Do not develop Green Belt Land.	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".		None
P1_00 168	No	Stipulating a minimum of 50% affordable housing for sites with more than ten new dwellings is undesirable. It will mean a distortion of housing patterns across the community with affordable housing being heavily concentrated in a few new sites. This will lead to socially unwelcome medium and long term consequences.	• 50% affordable in developments with 10 or more dwellings will lead to a distortion of housing concentrated on a few new sites which will lead to unmixed and social issues	Noted		None
P1_00 169	No	Sarratt - Small-scale proposals delivering 100% affordable housing. There is currently a good mix of affordable residence within the housing stock of Sarratt. Changing the mix % allowing a focus on only affordable will have detrimental effect on the balance of the current community.	• Having more affordable housing will impact upon the mixed community.	Noted		None
P1_00 170	No	1. A) 40% of the total number of dwellings as affordable housing for rent, and b) 10% of the total number of dwellings as affordable home ownership equals 50% of the development. But the % of the local population looking to get onto the housing ladder is not 50% of the local population. "Designs resulting in high maintenance or service charges SHALL (not should) be avoided." Should be used in the plan and it is the wrong word as it makes the requirement non-mandatory.	• 50% of the population do not need affordable homes so why set at this percentage?	Noted		None
P1_00 174	Yes	YES but... (see below)	• Agree with approach	Noted		None
P1_00 181_C hiltern Society	Not Specified	Affordable housing is a critical issue across the Chilterns to enable local people to stay in the area. Given the high property values, and the likelihood that property to purchase would not be affordable for most people, provision based on social rent seems to be an appropriate way forward. Whilst the Plan does not specify what constitutes 'affordable' in Three Rivers, the prices are likely to be so high that they would be out of reach of people on average salaries. This broadly covers what we would expect.	• Provision based on social rent is an appropriate way forward	Noted		None
P1_00 183	Yes	Using land already built on makes more sense	• Agree with approach	Noted		None
P1_00 184	No	The words "affordable housing" are interpreted differently by the policy makers and the general public. The Government definition is at odds with the public understanding of their meaning. One consequence of the sale of publicly owned housing ("right to buy" legislation) has been continuing inflation in the cost of renting property.	• Government definition of affordable housing with public understanding of meaning;	Noted		None

			<p>I believe 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.</p> <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>	<ul style="list-style-type: none"> • Social renting is needed for young families; • Affordable housing is meaningless in a high cost area. 		
P1_00 186	No	<p>This site should not be developed due to the increased pressure on the environment and infrastructure</p>	<ul style="list-style-type: none"> • Site should not be developed due to pressure on infrastructure. 	Noted	None	
P1_00 187	No	<p>The words "affordable housing" are interpreted differently by the policy makers and the general public. The Government definition is at odds with the public understanding of their meaning. One consequence of the sale of publicly owned housing ("right to buy" legislation) has been continuing inflation in the cost of renting property.</p> <p>I believe 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.</p> <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>	<ul style="list-style-type: none"> • Government definition of affordable housing with public understanding of meaning; • Social renting is needed for young families; • Affordable housing is meaningless in a high cost area. 	Noted	None	
P1_00 189		<p>The proportion of affordable housing proposed is 40% but I understand that the actual for affordable housing for rent is equivalent to 60% of the district's total housing requirement under the standard methodology. The affordable housing requirement must be increased to meet the need of our residents. What institution other than TRDC is going to meet that need? Why would the council attend to any other need? It is not the job of the council to satisfy the demands of house builders and developers.</p> <p>My main demands are that residents 'interests override all others', that new housing all will be affordable or social rented housing. Further than this I propose that developers should be subject to a maximum house sale value of somewhere between £300K and £400K. This will concentrate their minds on housing density and the nature of built housing.</p>	<ul style="list-style-type: none"> • Proportion of affordable housing should be 60%; • Affordable housing requirement must be increased to meet need of our residents; • Developers have a maximum house sale value between £300k and £400k. 	Noted	None	
P1_00 190	No	<p>The percentage of 40% is too high.</p>	<ul style="list-style-type: none"> • No affordable housing 	Noted	None	
P1_00 191	Yes	<p>Affordable housing is clearly a priority over the next 20 years. It might be helpful to have a clearer definition of what TRDC sees as affordable housing</p>	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 196	No	<p>The Council fails to acknowledge the real need, demands and preferences in Three Rivers for social housing and starter homes, which should be income-related. The definition of 'affordable' housing is 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. Local circumstances mean that TRDC needs to ensure that smaller sites (less than 10 dwellings) will have a crucial role in the delivery of affordable housing.</p>	<ul style="list-style-type: none"> • Does not acknowledge need, demands and preferences for Three Rivers; • Definition is meaningless in high-cost area such as Three Rivers; • Developments less than <10 units will crucial rose in affordable housing. 	Noted	None	
P1_00 201	Yes	<p>I think its fine but I'm still concerned about building anything on Green Belt, because it'll open the floodgates and never stop.</p>	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 204	Yes	<p>It appears appropriate to the needs.</p>	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 206	No	<p>Be realistic: "(8) To ensure community cohesion and good design, affordable homes must be fully integrated in the design of the overall scheme, being physically and visually indistinguishable from market units and dispersed across the site in clusters appropriate to the size and scale of the development." This never happens. Especially at the DPH you are looking at applying within the area.</p>	<ul style="list-style-type: none"> • Affordable housing cannot integrate with developments, especially at a high density. 	Noted	None	
P1_00 209	No	<p>the percentage of affordable housing, considering the locals proposed, is far too high for the infrastructure available in those areas</p>	<ul style="list-style-type: none"> • Affordable Housing is far too high for infrastructure 	Noted	None	
P1_00 211	No	<p>The proportion of affordable housing proposed is 40%. It is not clear why a target of 40% has been set. The affordable housing requirement must be increased in line with the need. There is a very serious problem in Three Rivers in that developers are regularly submitting Viability Assessments to show the amount of affordable housing requirement will make the development not profitable enough to be viable. It is hard to believe, in a district that has one of the highest house prices in the country, that developers are unable to make a viable profit on building new homes. This must be challenged in the strongest possible terms</p>	<ul style="list-style-type: none"> • Affordable Housing figure must be increased with need and evidence needed to demonstrate why 40% target has been set 	Noted	None	
P1_00 213	Yes	<p>No further comment</p>	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 218	No	<p>No. 'Commuting' the requirement to build affordable housing to another location defeats the purpose of the request that housing developments are mixed on each site "whether more or 10 dwellings, so shouldn't be allowed / encouraged. In 4.40, 1a it states that 40% of new housing would be affordable (rent), but in 4.48 it tells us that the local need is 60% affordable rental property. So, is the TRDC aiming to under-meet the need, or is it that the need is considered to be less than this, due to the out-migration of young workers in the past two years?</p>	<ul style="list-style-type: none"> • Affordable should be at a rate of 60% not 40% units 	Noted	None	

P1_00 219	No	Although I support the construction of affordable housing the figure of 40% for rent is too high. Most people (in my experience) would prefer to buy their homes, as is the custom within the UK, hence being 'locked in' to rented accommodation is not a solution.	<ul style="list-style-type: none"> Figure of 40% for rent is too high 	Noted	None
P1_00 220	Not stated	<ol style="list-style-type: none"> Having studied evidence provided by the LHNA for South West Hertfordshire, the Associations agree that there is an acute need for affordable housing in Three Rivers. The high demand for housing, quoted in paragraph 2.25, is generated by people moving out from Greater London. In both Preferred Policy Option 4 and the supporting text, however, the Council fails to acknowledge the real need, demands and preferences in Three Rivers for social housing and starter homes, which should be income-related. 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. There could be more flexibility with regards to housing options, for instance, Community Land Trusts. The possible role of mobile home sites and houseboats is also not mentioned. Paragraph 2.5 refers to "a 46% increase in households over 65 by 2036." The Policy Option should address this, with cross-referencing to social policies. Nevertheless, the Associations are in general support for the suite of policies contained under Preferred Policy Option 4 under paragraphs (1) – (4). Departure from the NPPF 2021 (paragraph 63) is noted, but the Associations agree that the local circumstances in the District mean that smaller sites (of less than 10 dwellings) will have a crucial role in the delivery of affordable housing. The Associations note the policy on rural exceptions sites, as set out in paragraph 4 of Preferred Policy Option 4. It is suggested that the evidence for these types of developments should arise from the Neighbourhood Plans for Abbots Langley (which includes Bedmond and parts of Kings Langley) and Sarratt. As Neighbourhood Plans are prepared in direct consultation with local communities, these would provide more specific justification for departure from Green Belt policies. It is noted that the policy in paragraph 4 refers to both Bedmond and Sarratt, yet the supporting text (paragraph 4.56) refers only to the latter. Elsewhere, in Part 2 Sites for Potential Allocation, the Council proposes to remove and inset Bedmond from the Green Belt. The Associations strongly oppose this proposal and support the detailed statement which has been submitted by the Bedmond Residents' Association in response to this consultation. Thus, the reference to Bedmond should be retained in the policy and inserted into the supporting text. With regards to the mode and delivery of affordable housing, the Associations question whether the mechanism for commuted sums, referred to in sub-paragraph (7), is appropriate. 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. For an example of good practice, the Council is referred to The London Plan 2021 and policies H4 and H5 on affordable housing. The London approach to viability was underpinned by the earlier publication of the Mayor's Affordable Housing and Viability SPG. In that document, if 40% of housing were to be provided on a site, then a viability statement would not be required (in the London Plan 2021, this is now 50%). 	<ul style="list-style-type: none"> Definition of affordable housing is meaningless in a high cost area such as Three Rivers; Paragraph 2.5 refers to "a 46% increase in households over 65 by 2036." The Policy Option should address this, with cross-referencing to social policies. Developments less than <10 units will crucial rose in affordable housing. Evidence for rural exception sites should arise from Neighbourhood Plans being prepared for Abbots Langley and Sarratt; Policy in paragraph 4 refers to both Bedmond and Sarratt, yet the supporting text (paragraph 4.56) refers only to the latter. Oppose removal of Bedmond from the Question whether mechanism for commuted sums in sub-paragraph (7), is appropriate. Should be clear guidance on size thresholds applicable to each type of site. Viability considerations should be covered in the policy and demonstrate how this was calculated. Example of good practice, Council refer to The London Plan policies H4 and H5 on affordable housing. Approach to viability was underpinned by Mayor's Affordable Housing and Viability SPG. In SPG, if 40% of housing were to be provided on a site, a viability statement would not be required (in the London Plan 2021, this is now 50%). 	Noted	None
P1_00 221	Not Stated	Council fails to acknowledge the real need and demands for Social Housing and Starter Homes, which should be income-related. The definition of 'affordable housing in a high cost area' in a high-cost area like Three Rivers, a more detailed statement should be made.	<ul style="list-style-type: none"> Council do not acknowledge real need for social housing and starter homes; More detailed statement on definition of affordable housing needed. 	Noted	None
P1_00 222	Not Stated	<p>The proportion of affordable housing proposed is 40% - 50% of the number of dwellings (40% for rent and an additional 10% for ownership in developments of 10 or more dwellings)</p> <p>It is stated that the need for affordable housing for rent is equivalent to 60% of the district's total housing requirement under the standard methodology (and a higher percentage if the area delivers a lower number of new housing). It is not clear why a target of 40% has been set. The affordable housing requirement must be increased in line with the need.</p> <p>There is a very serious problem in Three Rivers in that developers are regularly submitting Viability Assessments to show the amount of affordable housing requirement will make the development not profitable enough to be viable. It is hard to believe, in a district that has one of the highest house prices in the country, that developers are unable to make a viable profit on building new homes. This must be challenged in the strongest possible terms.</p> <p>The criteria defining "exceptional cases" for lowering the affordable housing contribution needs further interrogation and explanation. Every power should be used to resist the reduction of affordable housing.</p> <p>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.</p>	<ul style="list-style-type: none"> Not clear why 40% target has been set when need is 60%, must be increased to 60%; Don't believe developers viability assessments reducing housing need in one of the highest house price area in the country; Criteria for "exceptional cases" and lowering affordable housing contribution needs further explanation; Better provision for wheelchair users, for ageing population. 25% of affordable housing to meet M4 (3) standard 	Noted	None
P1_00 223	No	I think we need more affordable/social housing than what is proposed and we should not allow developers to later say they cannot supply the amount of affordable housing as it is not profitable and then pay the Council a sum of money instead as happens a lot now.	<ul style="list-style-type: none"> Need more affordable housing and do not allow developments that cannot supply housing. 	Noted	None
P1_00 224	Yes	We need to ensure everyone has somewhere to live but in the right conditions to add to the community not take away.	<ul style="list-style-type: none"> Agree with approach 	Noted	None

P1_00 226	Yes	The reality is that Hertfordshire is expensive and the driving force for development is profit not the wellbeing of residents and future tenants. We agree that there needs to be affordable housing but the reality is that unless the younger generation have a high income they will be unable to afford to live in Hertfordshire. The development of Housing in Greenbelt area is unlikely to result in affordable housing.	<ul style="list-style-type: none"> Hertfordshire is expensive and need affordable housing, but reality is people cannot afford to live in the area unless they have a high income. 	Noted	None
P1_00 227	No	The words 'affordable housing' mean different things to different people. The Government definition differs from the public understanding of their meaning. One consequence of the sale of publicly owned housing (right to buy legislation) has been continuing inflation in the cost of renting property. 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. 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. The policy should include how the provision of affordable rent dwellings will be measured and how affordable rent of these dwellings will be continued once they have been built. There should be better provision for those with limited mobility and wheelchair users, to reflect the increasing needs of an ageing population. At least 25% of affordable housing should be built to meet the Building Regulations M4 (3) standard.	<ul style="list-style-type: none"> Government definition of affordable housing with public understanding of meaning; Social renting is needed for young families; Affordable housing is meaningless in a high cost area. Better provision for wheelchair users, for ageing population. 25% of affordable housing to meet M4 (3) standard 	Noted	None
P1_00 230	Not Stated	<p>1. The definition of "affordable" housing is meaningless in a high-cost area such as Three Rivers. There is a lack of opportunity for local people who were born in our area to be able to buy a house in our area. The definition of affordable as "80% market value" is not affordable and house prices must be income related. The Local Plan promises affordable housing for local people. More options regarding housing must be sought and made available so that affordable housing to meet local need can be delivered.</p> <p>2. Flexibility on housing options such as Community Land Trusts. Mobile home sites and houseboats are not mentioned.</p> <p>3. The Council needs to work with housing providers and organizations to explore options for truly affordable and income related housing options.</p> <p>4. The reference to Bedmond regarding rural exception sites in paragraph 4.56 should be retained in the policy wording.</p>	<ul style="list-style-type: none"> Definition of affordable housing is meaningless in a high cost area; Definition of affordable as "80% market value" is not affordable and house prices must be income related; Flexibility on housing options such as Community Land Trusts. Mobile home sites and houseboats are not mentioned. Work with housing providers and organisations to explore options for truly affordable and income related housing options. Reference to Bedmond regarding rural exception sites in para 4.56 should be retained in the policy wording. 	Noted	None
P1_00 233	No	I disagree that the Preferred Policy Option for Affordable Housing is the right approach. The need for more affordable housing should not be used as justification to build on green belt. Alternative brownfield sites should be considered	<ul style="list-style-type: none"> Affordable Housing should not be justification for removing land from the green belt 	Noted	None
P1_00 234	No	I disagree that the Preferred Policy Option for Affordable Housing is the right approach. The need for more affordable housing should not be used as justification to build on green belt. Alternative brownfield sites should be considered	<ul style="list-style-type: none"> Affordable Housing should not be justification for removing land from the green belt 	Noted	None
P1_00 235	Yes	x	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 236	No	50% of all developments being affordable housing is surely unrealistic. Who will build without the motivation of a return? If no-one builds then the problem is surely worsened, Then 40% rental v 10% ownership seems to be the wrong weighting in a country where people aspire to ownership and should be encouraged to be investing in a local community.	<ul style="list-style-type: none"> 50% of development being affordable is unrealistic; 40% rental v 10% ownership is wrong approach when aspire home ownership 	Noted	None
P1_00 238	Yes	See report by Magenta Planning on behalf of Thrive Homes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 240	Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 244	No	Because "affordable" is not defined. In housing scheme after housing scheme "affordable" is used too loosely. Affordable to who? The term is lacking precision, is a get-out for developers.	<ul style="list-style-type: none"> Affordable is not defined 	Noted	None
P1_00 250	Yes	Local Plan Regulation 18 (Part 1) Preferred Policy Options Consultation June 2021 These representations are submitted by Iwan Jones, Managing Director of JIG Planning & Development Ltd, on behalf of the landowner of the land to the north of Chalfont Lane, Maple Cross identified as site EOS12.3 within Part 2 of the Local Plan Regulation 18 Sites for Potential Allocation. Average house prices in Three Rivers are some of the highest in the country outside London. The Local Housing Needs Assessment (LHNA) demonstrates that the average house price in Three Rivers during 2017 was £641,706. This is significantly above the Hertfordshire average of £492,392 and the England and Wales average of £338,621 over the same period. The recent under-delivery of housing within Three Rivers where only 872 homes were built in the period 2017-2020 (Housing Delivery Test 2020) as opposed to a target of 1619 homes has had a knock-on effect on the delivery and supply of affordable housing. This has exacerbated an already pressing and acute requirement for affordable homes. Consequently, we consider that the Council is justified in its approach to affordable housing as many local people have difficulty in accessing housing on the open market particularly given the value of house prices within Three Rivers. This particularly affects the young and those on lower incomes who are entering the housing market.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 253	Not stated	The council has provided its justification requiring sites delivering fewer than 10 new dwelling to contribute towards affordable housing. This conflicts with the national approach within the Framework. Policy text at part (7) which provides that on small sites delivering between one and nine dwellings, contribution to affordable housing may be made through commuted payments to fund the development of affordable housing on other sites elsewhere within the district.	<ul style="list-style-type: none"> Approach to developments less than 10 dwellings is in conflict with national approach; 	Noted	None

			<p>However, in recognition of the fact that there is a fundamental conflict with the Framework on this issue, and the difficulty of accommodating affordable housing on site within small developments, we believe that policy text should make clear that commuted sums in lieu of provision on site will be accepted, rather than "may be [made] through commuted payments". Given the council is dependent on small sites to contribute towards its housing requirements, this simple amendment would remove any uncertainty on this point.</p>	<ul style="list-style-type: none"> Need to make it clear that commuted payments would be acceptable, not maybe acceptable. 		
P1_00 254	Not Stated	<p><i>Policy 4: Affordable Housing</i> sets a flat affordable housing requirement of 40% of the total number of dwellings for rent (80% social rent and 20% affordable rent) with a further 10% of the total number of dwellings for affordable home ownership.</p> <p>The Council's affordable housing requirement is one of the most substantial in the Country with a tenure split very heavily weighted towards the delivery of social rented housing, which typically generates the lowest level of return of the affordable housing tenures. The proposed affordable housing requirement could therefore prove challenging to both registered providers, as well as those delivering open market housing.</p> <p>The wording of Policy 4 and its justification makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances stating that:</p> <p><i>(9) Affordable housing requirements that have been determined on the basis of viability and site-specific viability information seeking to justify an alternative level or mix of affordable housing will therefore only be accepted in exceptional cases. Viability assessments should be undertaken in accordance with the recommended approach set out in national planning guidance, including standardised inputs, and will be made publicly available.</i></p> <p>It is clear from the wording of the policy and its justification that the Local Authority is cognisant of the increased emphasis on Local Plan viability testing in Paragraph 54 of the NPPF. The evidence underpinning the Council's affordable housing requirement should therefore be robust and we would respectfully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>Disappointingly the evidence base published with the Preferred Options (Regulation 18) did not make the Local Plan Viability Assessment (LPVA) publicly available. The respondents sought clarification from the Council on this matter and were advised by the Planning Policy Team via email that the LPVA had not been finalised and had subsequently not been published. The Council's intention, as we understand it, is to publish the LPVA alongside the Regulation 19 Assessment. In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.</p> <p>The PPG makes it clear that Local Plan process is a collaborative process stating that 'It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers' (Paragraph: 002 Reference ID: 10-002-20190509). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.</p> <p>It is our view that the Council should consult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.</p> <p>We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</p> <p>Finally, we note the way the Council has sought to limit the application of the Vacant Building Credit in sub-clause 11) by stipulating several criteria that go substantially beyond the guidance of the PPG. This aspect of policy is contrary to national policy accordingly.</p>	<ul style="list-style-type: none"> Affordable housing requirement is one of most substantial in the Country; Social rented housing typically generates the lowest level of return; Evidence underpinning Council's affordable housing requirement should be robust; Local Plan Viability Assessment needs to be published for Reg. 19 consultation; Need to publish Local Plan Viability alongside Reg 18 consultation. Council has sought to limit application of the Vacant Building Credit in sub-clause 11 by stipulating several criteria that go substantially beyond guidance of the PPG. This aspect of policy is contrary to national policy accordingly 	Noted	None	
P1_00 256	No	<p>All new developments should be for social rent or for sale only to people who will own only one property</p>	<ul style="list-style-type: none"> All developments should be affordable only 	Noted	None	
P1_00 258	No	<p>As a Chartered Surveyor living in Abbots Langley and specialising in the valuation of new housing developments, I fully support the need for affordable housing in Three Rivers. However, a very onerous affordable housing policy is counterproductive to bringing forward sites to satisfy this need. In my opinion a better policy would be as follows:</p> <ol style="list-style-type: none"> 35% of all new developments over 10 units to be affordable Of that affordable number of units, 35% are to be for social rent, 45% for affordable rent and 20% for shared ownership <p>In my work acting for housing associations, I see time after time that an onerous affordable housing policy results in planning permissions being granted that rarely deliver the full quota of affordable units because the developer uses viability arguments to water down the number and mix of affordable units that the scheme can deliver. If the affordable target was more realistic in the first place the arguments against the affordable ratio would be reduced. The key issue</p>	<ul style="list-style-type: none"> Needs to be 35% affordable units to be affordable; Of the affordable no of units, 35% for social rent, 45% affordable rent and 20% for shared ownership; Social rent only have a 40% market value and developer would make no profit, why there should be a limit to 35%; If it was well known that the affordable policy in Local Plan was sacrosanct and 	Noted	None	

			here is that social rent units have a capital value of only 40% of a market value identical unit and thus a developer will sell on such units to a housing association at cost and make no profit. That is why for a scheme to be deliverable in the real world I feel social rent units should be limited to 35% of the affordable units provided. To ensure such deliverability I would urge local authorities to press the Govt to scrap any viability arguments being made by a developer. The local authority has its hands tied in being forced to consider viability arguments and hence the Govt is largely responsible for the poor delivery of affordable housing in the South East. If it was well known that the affordable policy in the Local Plan was sacrosanct and had to be fully met it would drive down land prices and help to promote delivery of affordable new homes.	had to be fully met, would drive down land prices and promote delivery of affordable new homes.		
P1_00 260	Not Stated		Definition of social housing is meaningless and there should be starter homes.	<ul style="list-style-type: none"> • Definition of social housing is meaningless; • Should be starter homes 	Noted	None
P1_00 262	Yes		More affordable housing. Reduce shared ownership scheme scams. Reductions in affordable housing due to viability to commercial homebuilders should not be allowed under any circumstances.	<ul style="list-style-type: none"> • Need more affordable homes 	Noted	None
P1_00 265	Yes		There is a need for affordable housing, so a plan needs to be created to deliver this.	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 267	No		Actually, I do not know whether these are reasonable allocations of social housing. There is no way I can research this. However, I would certainly wish there to be adequate social housing and I hope the above would provide enough. It would help if there were an 'I don't know' response to these forms.	<ul style="list-style-type: none"> • Need to ensure there is adequate social housing. 	Noted	None
P1_00 271	Yes		Looks ok	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 275	No		not building on green belt, increasing traffic and over populating areas	<ul style="list-style-type: none"> • Do not build on Green Belt Land, will increase traffic and over-populate areas; 	Noted	None
P1_00 278	No		The high proportion of affordable housing as social housing Vs privately owned homes makes a big imbalance to the type to the housing density mix that we need. Sustainable employment also needs to be there where there are a large number of affordable Housing/Social Housing stock e.g. large scale manufacturing etc. There is no provision for these or large employers around Carpenders Park / South Oxhey as both are already densely populated.	<ul style="list-style-type: none"> • High proportion of affordable housing vs privately owned homes make a large imbalance to type of homes required; • Sustainable employment is also needed near affordable housing. 	Noted	None
P1_00 279	No		The Council fails to acknowledge the real need, demands and preferences in Three Rivers for social housing and starter homes, which should be income-related. The definition of "affordable" housing is 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. Local circumstances mean that TRDC needs to ensure that smaller sites (less than 10 dwellings) will have a crucial role in the delivery of affordable housing.	<ul style="list-style-type: none"> • Does not acknowledge need, demands and preferences for Three Rivers; • Definition is meaningless in high-cost area such as Three Rivers; • Developments less than <10 units will crucial rose in affordable housing. 	Noted	None
P1_00 281	Yes		THERE IS NO SUCH THING AS AFFORDABLE HOUSING IN THIS AREA. I earn a good wage but struggle hugely	<ul style="list-style-type: none"> • No such thing as affordable housing in the area. 	Noted	None
P1_00 282	No		No Comment	<ul style="list-style-type: none"> • No Comment 	Noted	None
P1_00 287	Yes		Looks good in principal as long as it is backed up by Schools, Medical centres, Dentists Chemists etc. Housing for our children who can't afford high prices, teachers, nurses etc. Though people shouldn't crammed together - there should be spaces for children to play too.	<ul style="list-style-type: none"> • Agree with approach provided necessary infrastructure is provided. 	Noted	None
P1_00 292	Yes		Only comment is have affordability requirements as high as legally possible. Rather than 40% affordable, make it 50% as a starting point. There is an acute unaffordability problem in TRDC and it should be explicitly stated that because TRDC is so expensive it needs a higher affordability ratio than other local authorities.	<ul style="list-style-type: none"> • Should be 50% as there is acute unaffordability in Three Rivers. 	Noted	None
P1_00 293	No		Whilst we support the principle of providing Affordable Housing, we object to this proposal as the level of Affordable Housing is exceptionally high at 50%. This is the highest of all Hertfordshire Authorities and beyond. If the Council were to meet its housing needs, the percentage of Affordable Housing could be reduced but still provide close to the total number of Affordable Homes planned for at present in the draft Plan. The Council has a well-documented affordability issue at present, including house price levels. Meeting the housing target would ease pressure with consequential benefits. We argue that the tenure mix set out in the draft Plan of 80% Social Rent and 20% Affordable Rent will make the provision of Affordable Housing unviable, as a high Social Rent percentage can produce a negative land value. The tenure mix proposed combined with high CIL rates will disincentives residential schemes and would impede the delivery of affordable housing. In light of the above, we strongly recommend the level of Affordable Housing is reduced to 40%, with a tenure mix of 55% Affordable Rent, 25% Intermediate and 20% Social Rent. This would create the right balance and ensure the viability of residential sites coming forward to help the Council meet its housing needs. At the very least, the draft Plan should be supported by a viability study, which we cannot see in the evidence base. Please refer to the cover letter for further information.	<ul style="list-style-type: none"> • Need to reduce affordable housing target as highest amongst Hertfordshire authorities; • 80% social rent/ 20% affordable split is not viable; • Plan should be supported by a viability assessment, cannot see this ion the plan; 	Noted	None

Q5. Should we have considered alternative options?

P1_00 001	Yes		A proper definition of "affordable" would be by reference to average salaries - say four times for purchase of a one person unit or one-fifth for annual rent.	<ul style="list-style-type: none"> • Need a proper definition of 'affordable' 	Noted	None
P1_00 014	Yes		See previous answers	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 017	Yes		Council owned and rented - oops I sound like a socialist	<ul style="list-style-type: none"> • Need Council owned and rented accommodation 	Noted	None
P1_00 020	Yes		Keeping affordable rental housing for longer term use rather giving option to own.	<ul style="list-style-type: none"> • Keep affordable rental for longer term use. 	Noted	None

P1_00 023	Yes	See comment above	<ul style="list-style-type: none"> Disagree with long term rental approach. Landlords cannot be held to low rents long term and comparisons with London housing is considered more appropriate 	Noted	None
P1_00 024	Yes	I think a higher percentage of homes should be available to buy rather than to rent.	<ul style="list-style-type: none"> Higher percentage of homes to but not rent 	Noted	None
P1_00 025	Yes	Lower % of affordable housing	<ul style="list-style-type: none"> Lower % of affordable housing 	Noted	None
P1_00 026	Yes	Have empty homes in the borough being looked at?	<ul style="list-style-type: none"> Look at empty homes in the borough 	Noted	None
P1_00 032	Yes	I think higher proportions of affordable housing would be reasonable.	<ul style="list-style-type: none"> Higher proportion of affordable housing would be reasonable 	Noted	None
P1_00 040	Yes	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> Do not develop Green Belt Land 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 041	Yes	Just to check that the chosen approach is definitely the most appropriate.	<ul style="list-style-type: none"> Confirm chosen approach is the correct one 	Noted	None
P1_00 045	Yes	In general, planning officers should have clear parameters within which they can negotiate with developers. A 40% limit may not be sustainable but the policy should be clear about the line which the council will not cross.	<ul style="list-style-type: none"> Planning officers need clear parameters which to negotiate. 40% may not be sustainable but policy should be clear about line council will not cross. 	Noted	None
P1_00 048	Yes	Affordable housing should be focussed on larger towns close to transport links.	<ul style="list-style-type: none"> Focus affordable housing on larger towns close to public transport links 	Noted	None
P1_00 049	Yes	Insisting on developers having at least 30% of all new properties to be affordable. Possibility of councils purchasing % properties for rent so rents can be lower than a mortgage.	<ul style="list-style-type: none"> Insist developers have at least 30% of new properties to be affordable; Possibility of councils purchasing % properties for rent. 	Noted	None
P1_00 057	Yes	Area is already prone to flooding, parking problems, and an oversubscribed primary school.	<ul style="list-style-type: none"> Area is prone for flooding, parking problems and oversubscribed primary school. 	Noted	None
P1_00 063	Yes	Explained Above	<ul style="list-style-type: none"> Affordable housing should only be built 	Noted	None
P1_00 064	Yes	50% of housing should be for affordable rent. There should be no distinction between social rent and affordable rent	<ul style="list-style-type: none"> 50% of affordable housing is for affordable rent; No distinction between social and affordable rent. 	Noted	None
P1_00 066	Yes	Please see above	<ul style="list-style-type: none"> Against, if unaffordable then unaffordable 	Noted	None
P1_00 068	Yes	You should have kept it REAL! You cannot expect a developer to invest his money to develop cheap housing for the social sector - that looks no different and is mixed in" with more expensive houses.	<ul style="list-style-type: none"> Cannot expect developers to invest money in cheap housing. 	Noted	None
P1_00 076	Yes	Incentives for elderly people living in large homes to move to smaller attractive homes. Plus another raft of measures to ensure current housing stock is being utilised efficiently.	<ul style="list-style-type: none"> Need to be incentives for elderly people living in large homes to smaller attractive homes. 	Noted	None
P1_00 096	Yes	Should create another new town like Hemel Hempstead / Stevenage, the national shortage of "affordable housing" was created by the sell-off of council stocks in the 80s and requires much larger scale solutions	<ul style="list-style-type: none"> Create another new town like Hemel Hempstead/ Stevenage, national affordable housing stock is in short supply due to 80's sell-off of stock 	Noted	None
P1_00 102	Yes	As above - a higher percentage of affordable home ownership properties.	<ul style="list-style-type: none"> Need a higher percentage of affordable home ownership properties 	Noted	None

P1_00 103	No			• No alternatives suggested	Noted	None
P1_00 107			It's not clear who is being catered for in the council's plan. What's the aim? Who are the council actually trying to help? Are we going for numbers here, and just providing work for property developers?	• Not clear what the aim is, who the Council are trying to help.	Noted	None
P1_00 112	Yes		My friends would say "don't mix housing types".	• Do not mix housing types.	Noted	None
P1_00 114	Yes		Stronger protections for the greenbelt, must be the build of very last resort.	• Stronger protection for the Green Belt	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 119	Yes		This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	• Land is sanctuary for wildlife	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00 121	Yes		Forget the greenbelt - find alternatives	• Do not develop Green Belt Land	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 127	Yes		Challenge central government policy	• Challenge central government policy	Noted	None
P1_00 132	Yes		no need reinvent wheel - see and collaborate what other councils doing	• See and collaborate what other authorities are doing.	Noted	None

P1_00 135	Yes	See above	<ul style="list-style-type: none"> Not clear why a target of 40% has been set; At least 25% of affordable homes should be wheelchair accessible 	Noted	None
P1_00 142	Yes	non green belt land	<ul style="list-style-type: none"> Do not develop Green Belt Land 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 144	Yes	Affordable homes is possible with moderate high rise buildings and mandatory shared green spaces adjacent	<ul style="list-style-type: none"> Affordable homes possible with moderate high rise buildings and shared green space. 	Noted	None
P1_00 147	Yes	Outside of just affordable homes you should develop properties to support essential key workers, where their pay does not allow them what others in the community have but because of the vital role local governments makes sure they homes are as efficient as possible to save them money	<ul style="list-style-type: none"> Built properties to support essential key workers, where pay does not allow what others in the community have but because of the vital role make sure homes are as efficient as possible to save them money 	Noted	None
P1_00 155	Yes	I would like to see some controls on rental properties - i.e. how many of the marketed units end up as buy to let. Are there any controls on how much a private landlord can charge? The rental market in the UK would benefit from a re-think, as the high rents for properties either exclude many people. Or prevent younger people being able to save to buy themselves. Many people become stuck in a rental accommodation with no option to buy.	<ul style="list-style-type: none"> Need controls on rental properties; Are there control on how much a private landlord can charge; Whole system benefits from a rethink. 	Noted	None
P1_00 163	Yes	Yes, to come to the correct decision	<ul style="list-style-type: none"> Consider alternatives to come to the correct decision 	Noted	None
P1_00 166	Yes	To keep the distinct nature of the villages and stop them becoming towns	<ul style="list-style-type: none"> Need to keep distinct nature of villages and stop them becoming towns 	Noted	None
P1_00 168	Yes	the affordable housing shortage should be solved by compelling developers to provide for affordable housing - but on a strategically blended basis across the area rather than being concentrated in a few new sites	<ul style="list-style-type: none"> Compel developers to provide affordable housing 	Noted	None
P1_00 170	Yes	Not only is the 50% affordable housing target too high it is too skewed towards renting. Once trapped into paying rent, it makes it more difficult to save for a deposit to purchase. Far more of the affordable homes should be available for purchasers. What is the difference between Social and Affordable Rent? This should be defined in the plan. If the affordable homes must be physically and visually indistinguishable from the market units, how are the Developers expected to make them affordable?	<ul style="list-style-type: none"> Target is too high and skewed towards renting; What is difference between social and affordable rents, define in the plan; If affordable homes need to be visually indistinguishable from market homes, how can they be made affordable. 	Noted	None
P1_00 174	Yes	I think there is greater demand for affordable homes for first time buyers (rather than renters) in the District. Young people who want to own their own home are being driven out of the area (and the county as a whole in some cases) as prices are so high and continue to climb ever higher. Allocating just 10% of the dwellings in a development to affordable ownership seems too little and is underestimating the desire of young people to OWN (not rent) their own homes.	<ul style="list-style-type: none"> Greater demand for first time buyers rather than renters; Allocating just 10% to affordable ownership is too little 	Noted	None
P1_00 183	Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 190	Yes	A lower amount of 25%	<ul style="list-style-type: none"> Lower target of 25% 	Noted	None
P1_00 206	Yes	Consider the DPH and levels of affordable housing to fit with the current environment.	<ul style="list-style-type: none"> Consider DPH and levels of affordable housing to fit within the local area. 	Noted	None
P1_00 209	Yes	It is for councillors to have consider sensible alternative options	<ul style="list-style-type: none"> Councillor need to consider alternative options. 	Noted	None

P1_00 219	Yes	As above	<ul style="list-style-type: none"> Figure of 40% for rent is too high 	Noted	None
P1_00 223	Yes	Working with Housing Associations to fund a higher percentage of social rent affordable homes. We also need more good quality one bed properties for single people with mental health needs.	<ul style="list-style-type: none"> Work with Housing Association to fund a higher percentage of social rent affordable homes. 	Noted	None
P1_00 235	Yes	x	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 236	Yes	A lower percentage of higher percentage of ownership	<ul style="list-style-type: none"> Lower percentage of higher percentage of ownership 	Noted	None
P1_00 240	Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 254_	Yes	That interested parties are given the opportunity to comment on the Local Plan Viability Study prior to the Regulation 19 Local Plan being published for consultation. That the application of the Vacant Building Credit is determined in accordance with the PPG.	<ul style="list-style-type: none"> Interested parties given opportunity to comment on Local Plan viability Study; Vacant Building Credit application is determined in accordance with the PPG. 	Noted	None
P1_00 256_	Yes	There should be a covenant on all new properties to state that they can only be owned by a housing association or by a person owning only a single property	<ul style="list-style-type: none"> Covenant on all new properties stating can only be owned by a housing association or a person only owning a single property. 	Noted	None
P1_00 262	Yes	Reductions in affordable housing due to viability to commercial homebuilders should not be allowed under any circumstances. Replace any social housing unit sold into private ownership like for like. Garden development for granny flats should be encouraged to allow families to stay in place as they expand and age.	<ul style="list-style-type: none"> Do not allow developers to reduce affordable housing targets under any circumstances; Encourage garden development for granny flats to allow families to stay in place as they expand and age. 	Noted	None
P1_00 265	Yes	I have always been in favour of not creating large areas of affordable housing but to create smaller integrated pockets within areas that can service the other needs to individuals or families whose income requires the relevant support. Again as an example I would guess that these individuals may have less access to vehicles and so locations with good transport links would be vital along with, in the case of families the ability to walk to shops, schools etc.	<ul style="list-style-type: none"> Create smaller integrated pockets within areas that can service other needs to individuals/families who require relevant support e.g. May not have access to private transport. 	Noted	None
P1_00 267	Yes	I don't know if you should have considered alternative options. It would help if there were an 'I don't know' response to these forms.	<ul style="list-style-type: none"> Don't know if alternative options were considered. Need 'don't know' response 	Noted	None
P1_00 275	Yes	Areas where traffic etc won't become an issue	<ul style="list-style-type: none"> Consider areas where traffic will not be an issue. 	Noted	
P1_00 282	No	No. This form is not the right approach to gathering opinions as it is too prescriptive.	<ul style="list-style-type: none"> Form is not right approach, too prescriptive. 	Noted	None
P1_00 293	Yes	Please see answer above. Please refer to the cover letter for further information.	<ul style="list-style-type: none"> Need to reduce affordable housing target as highest amongst Hertfordshire authorities; 80% social rent/ 20% affordable split is not viable; Plan should be supported by a viability assessment, cannot see this in the plan; 	Noted	None

FLOOD RISK AND WATER RESOURCES

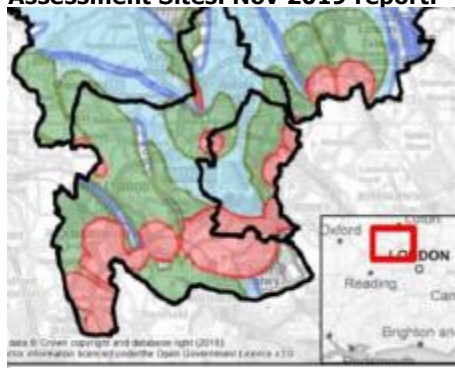
Q16. Do you think the Preferred Policy Flood Risk and Water Resources is the right approach?						
SC_00 014_Thames Water	Thames Water	Support	<p>Thames Water support Preferred Policy Option 15 and in particular Section 3 which relates to wastewater infrastructure. In relation to wastewater infrastructure 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>	<ul style="list-style-type: none"> Supports policy in particular Section 3 which relates to wastewater infrastructure That timeframe for delivering reinforcement measures/upgrades to the waste water network can take from 18 months with more strategic upgrades taking 3-5 years and therefore requests the following wording be added to supporting text 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: <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>	<ul style="list-style-type: none"> Support noted Current draft policy states: 3) Wastewater <ol style="list-style-type: none"> Where appropriate, planning permission for developments resulting in the need for off-site upgrades to wastewater infrastructure will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades. <p>Additional wording to be added to supporting text of policy to expand on this policy requirement and to make it clearer for developers and to encourage developers to engage Thames Water to discuss their wastewater requirements at an early stage, prior to planning applications.</p> 	<p>Additional wording to be added to supporting text of policy at 7.39:</p> <p>It is noted that many existing water mains and sewerage systems are increasingly becoming overloaded by successive development. It is therefore important that new development is served by an adequate means of water supply and sufficient foul and surface water drainage and adequate provision must be made for water supply and sewerage infrastructure.</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>

P1_00 003		No	I am opposed to any development in flood risk areas / flood plains etc due to knock-on impacts	<ul style="list-style-type: none"> Protect the Green Belt 	Noted	None
P1_00 005		Yes	Nothing to add	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00 006		Yes	With 3 rivers within this neighbourhood, re development of flood plains must be avoided. Local rivers, in particular the river Chess must be protected. Being a rare chalk stream by nature it must be protected from sewage being diverted in to it by Thames Water at time of high rainfall. With climate change being more evident and localised flooding an issue, the council must make provision to drain and utilise rainfall and to preserve the aquifers from over use. Local lanes flood and even residential roads flood where front gardens have been paved as driveways. More consideration must be made to reduce this run off and hence localised floods.	<ul style="list-style-type: none"> Agree with approach. Try and prevent polluted runoff getting into the River Chess. 	Noted	None
P1_00 014		Yes	Again, common sense but the reality will be telling... past decisions do not inspire confidence.	<ul style="list-style-type: none"> Agree with approach but past decisions were flawed and do not fill with confidence. 	Noted	None
P1_00 017		No	How can you still plan to allow building on potential flood plains? Leaving it the developers mean it won't happen	<ul style="list-style-type: none"> Why is development still taking place on the floodplain? 	Noted	None
P1_00 019		No	The areas marked for construction of new homes on Oxhey Lane are in flood risk areas.	<ul style="list-style-type: none"> Areas in Oxley Lane proposed to be developed are in Flood Risk Areas. 	Noted – See response to Part 2 comments in relation to site specific allocations.	None
P1_00 020		Yes	Good recommendations that must be enforce and used rather than just be a recommendation.	<ul style="list-style-type: none"> Agree with approach, must be enforced and not recommended. 	Noted	None
P1_00 021		Yes	The plan above all sounds great in theory In practice I do not know how it will be implemented I have no idea how unacceptable risk will be defined or interpreted From past experience it seems	<ul style="list-style-type: none"> Sounds good in practice but do not know if/ how will be implemented. 	Noted	None

			that builders get round all these by simply ploughing enough money in and then they just bypass all sensible rules	From experience developers will bypass all sensible rules.		
P1_00_023	Yes	Ok		• Support	Noted	None
P1_00_024	Yes	Attention must be given to flood prevention measures.		• Agree with approach	Noted	None
P1_00_025	No	Building on green belt land will increase flood risk		• Developing Green Belt Land will increase flood risk.	Noted	None
P1_00_026	Yes	Clear policy and considers the environment		• Support	Noted	None
P1_00_027		The role of gardens, especially front gardens, is missing. More lawns and other vegetation will help to reduce the risks of flash flooding. Conversely, the number of front gardens with 100% hardstanding increases the risks. Household as well as developers have a role to play. The local plan needs to reverse the damage that has already been done, and in doing so, will provide greater protection against flash flooding.		• Role of gardens, especially front gardens is missing. More lawns and vegetation will reduce flood risk. • Local Plan needs to reverse damage that has already been done.	Noted	None
P1_00_028	Yes	No knowledge of this but ok		• No objection	Noted	None
P1_00_032	Yes	A cautious approach to development in flood zones is very sensible		• Support	Noted	None
P1_00_033	Yes	It should also consider the increased pressure on the local drainage system, as this can also leading to flooding of dwellings.		• Agree with approach	Noted	None
P1_00_034	Yes			• Support	Noted	None
P1_00_038	Yes	Avoid building on flood plains. Minimise the lowering of the water table which impacts on the chalk streams		• Support	Noted	None
P1_00_040	No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.		• Do not develop Green Belt Land	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00_041	No	I do not think that areas at risk of flooding should ever be developed.		• Do not develop areas in Flood Risk	Noted	None
P1_00_045	Yes	I should have liked to have seen specific statements about the ability of existing infrastructure to cope with ground water, drainage and sewerage. In the Rickmansworth area, the inadequacy of the drainage system is a matter of public record; the likely drainage impact and waste water implications of a proposed development should be a material factor when considering scale and location.		• Need statements on existing infrastructure ability to cope with existing water drainage and sewage. Rickmansworth has as a public record the inadequacy of the drainage system and future development needs to take this into consideration.	Noted	None
P1_00_046	Yes	Flood risk must be minimised		• Support	Noted	None
P1_00_047	Yes	This policy is correct.		• Support	Noted	None
P1_00_048	Yes	No Comment		• Support	Noted	None
P1_00_049	Yes	It could be better and should be reviewed every two years		• Support but review every two years	The Environment Agency are responsible for updating Flood Risk Maps. The Council will monitor whether there are any changes in Flood Risk as a result of these changes on the allocations as part of a future Local Plan Review.	None
P1_00_053	No	Developments in flood risk sites (Flower House) has been suggested and is against this policy		• Do not develop in Flood Risk areas, for example Flower House	Noted	None

P1_00 054	Yes	We need conserve more water.	<ul style="list-style-type: none"> Agree with approach. Conserve more water. 	Noted	None
P1_00 055	Yes	Flooding and water a big problem with so many new homes being considered.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 056	Yes	WITH RESERVATIONS: Should include the requirement for developers to be mandated to: - Make adequate and readily maintainable and sustainable provision for surface drainage. - Para 7.39: provide robust supply and drainage infrastructure. Also, Para 7.40 should provide an explanation as to why a 'Strategic Flood Risk Assessment' has not been provided or is 'not realistic'.	<ul style="list-style-type: none"> Agree with approach. Developers must be mandated to make adequate/ readily maintainable provision for surface drainage (Para 7.39). Para 7.40 should explain why a 'Strategic Flood Risk Assessment' has not been provided or is 'not realistic'. 	Noted	None
P1_00 057	Yes	Area is already prone to flooding. Building on flood plains is unacceptable.	<ul style="list-style-type: none"> Do not develop in Flood Risk areas 	Noted	None
P1_00 063	Yes	Agree	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00 064	No	We should not build in areas with flooding risk. With climate change the risk is an eventuality that will happen every 5-10 years.	<ul style="list-style-type: none"> Do not develop in areas of flood risk. 	Noted	None
P1_00 066	No	All developments must be self-sufficient or all the old areas will suffer	<ul style="list-style-type: none"> All developments must be self-sufficient. 	Noted	None
P1_00 068	Yes	I find myself agreeing with the basic tenets expressed – but will you honour them? I also feel that some common sense is necessary - say in the case where someone wishes to refurbish a mill - there are quite a few in Three Rivers.	<ul style="list-style-type: none"> Agree with approach but query whether they would be implemented. Common sense is necessary, such as the refurbishment of a mill. 	Noted	None
P1_00 069	No		<ul style="list-style-type: none"> Do not agree with approach but no reasons given. 	Noted	None
P1_00 071	Yes	Agreed	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_00 074		A lot of this also applies to the whole district and should say so, all residents should be encouraged to use less water and the plan should set out what is being done to mitigate possible flooding.	<ul style="list-style-type: none"> Residents should be encouraged to use less water; Plan should set out what to do to mitigate against possible flooding. 	Noted	None
P1_00 076	Yes	I don't know enough about this to comment sensibly. I do know nature is the best for flood management and hard surfaces are the worst so all new developments will need lots of green spaces incorporated into them.	<ul style="list-style-type: none"> All developments need green spaces to help with flood defences 	Noted	None
P1_00 078	Yes	All reasonable requirements but developers shouldn't be allowed to side step the need.	<ul style="list-style-type: none"> Agree with approach. Do not allow developers to side step the issue 	Noted	None
P1_00 080	Yes	N/A	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 084	Yes	Chorleywood is a flood site so any building works needs to be looked at before commencement.	<ul style="list-style-type: none"> Chorleywood is in a flood risk area so needs to be reviewed before development commences. 	Noted	None
P1_00 088	Yes	Sensible	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 089	Yes	We need to exhaust the brown belt and build on those areas first without impact to the Green Belt land, once built on there is no turning back and the countryside is lost forever. We have been through a complete change in our lifestyles over the last 18 months and it will continue for a many few years so outdoor space and Green belt land unspoilt is priority for all, health & wellbeing of all, younger and older generations.	<ul style="list-style-type: none"> Build on brownfield land first; Do not develop Green Belt Land as will be lost forever and used more with COVID 19 pandemic as outdoor space. 	Noted	None
P1_00 096	Yes	Seems sensible	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 097	Yes	Issues of river water pollution i.e. raw sewage going into rivers, should be addressed and urgent action taken to ensure that facilities are improved by those responsible.	<ul style="list-style-type: none"> Agree with approach. Address issues such as raw sewage going into rivers. 	Noted	None
P1_00 102	Yes	Developments must not be permitted on flood plains nor should they have an impact on local rivers. People's lives are ruined by not being able to get insurance on properties which could flood.	<ul style="list-style-type: none"> Do not permit development on flood plains or where impact local rivers; 	Noted	None
P1_00 107	No	Given that most of our sewers are quite old, it seems crazy to talk about development without upgrading the sewer system first. Similarly flooding, there are known flood problems in the district, many of these would be made instantly worse because of large scale building plans. This also goes for other supporting services and utility services.	<ul style="list-style-type: none"> Need to upgrade sewage system first; There are known flood risk issues which also need to be addressed as large scale housing will worsen issues. 	Noted	None
P1_00 108	Yes	Why are thinking of building on the flooding area of Little Oxhey Lane. Where will the water go then?	<ul style="list-style-type: none"> Query why looking to develop within flooding area along Little Oxley Lane and where water would then go. 	Noted	None
P1_00 110	Not Specified	PPO 15 appears to be robust in respect of flood risk but less so in respect of water resources. For example, the water saving measures listed in para 2m. Should be mandatory. There is no reference to potential future water shortages or the requirements of NPPF paras 174 and 175 concerning the conservation, restoration and enhancement of priority habitats. Chalk rivers (including the Gade and especially the Chess) are priority habitats under S 41 of the Natural Environment and Rural Communities Act 2006. Planning permission should be refused if significant harm to biodiversity cannot be avoided as a result of a development (NPPF para 175). If as a result of new developments substantially increasing water demand, which leads to over abstraction of chalk streams, significant harm to biodiversity is inevitable. Although not listed as an evidence base document and in need of revision, the 2010 Water Cycle Study Scoping Study produced for five Hertfordshire LPAs including	<ul style="list-style-type: none"> Water saving measures should be mandatory; No reference to potential future water shortages or requirements of NPPF paras 174 and 175 concerning the conservation, restoration and enhancement of priority habitats. Over abstraction of water from chalk streams will lead to substantial harm to biodiversity; 	Noted	None

			Three Rivers, predicts water shortages within the plan period without new supplies of water becoming available, which is unlikely except from improved demand management and leakage reductions before 2030. The Water Cycle Study Scoping Study also identifies 'amber' constraints to development in a number of areas within Three Rivers due to the requirement for extensive infrastructure improvements to allow development. This includes sewer network and waste water treatment works upgrades, Together with considerations of sewer flood risk and habitat damage. Para 3 of PPO 15 substantially understates the significance of this issue. We welcome the setting of 110 litres per person per day as the standard to be achieved in water consumption.	<ul style="list-style-type: none"> Water Cycle Scoping Study identifies 'amber' constraints to development in a number of areas due to requirement for infrastructure improvements to allow development. With considerations of sewer flood risk and habitat damage. Para 3 of PPO 15 substantially understates significance of this issue. Welcome 110 litres per person per day as standard for water consumption. 		
P1_00_112	Yes	A recent local development has flooded. The road outside these new homes (not all of which had even been sold) resembled a river.		<ul style="list-style-type: none"> Recent local development has flooded. Roads outside resemble a river. 	Noted	None
P1_00_113	Yes	No reason.		<ul style="list-style-type: none"> Support 	Noted	None
P1_00_114	Yes	Concur		<ul style="list-style-type: none"> Support 	Noted	None
P1_00_116	No	With the increased frequency of extreme weather events there should be limited development in Flood Zone 3a. Additional steps to reduce the risk of flood should be considered by the developer.		<ul style="list-style-type: none"> Should be limited development in Flood Risk 3a. Additional steps to reduce flood risk needed. 	Noted	None
P1_00_117	Yes	Avoid Flooding		<ul style="list-style-type: none"> Agree with approach. Avoid flood risk areas. 	Noted	None
P1_00_119	No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.		<ul style="list-style-type: none"> Land is sanctuary for wildlife. 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00_120	Yes	A sensible approach provided proposed sites for development with any flood risk are excluded from the list at an earlier stage rather than wait until the Planning stage and Building regulations.		<ul style="list-style-type: none"> Agree with approach provided proposed sites with any flood risk are excluded from the list. 	Noted	None
P1_00_123	Yes	Ok		<ul style="list-style-type: none"> Support 	Noted	None
P1_00_127	Yes	You have to follow this and not ignore it and grant planning in areas that flood like Railway Terrace in Kings Langley.		<ul style="list-style-type: none"> Do not grant permission in areas which flood such as Railway Terrace in Kings Langley 	Noted	None
P1_00_130	Yes	It is the right approach		<ul style="list-style-type: none"> Support 	Noted	None
P1_00_131	No	Does any of this actually take into account the likely impacts of climate change? Its pointless planning based on historic flood risk calculations.		<ul style="list-style-type: none"> Does not take account of climate change and not relevant if only based on historic flood risk calculations. 	Noted	None
P1_00_132	Yes	get environment agency advice		<ul style="list-style-type: none"> Agree with approach. Get Environment Agency advice. 	Noted	None
P1_00_135	No	No new dwellings should be allowed in Flood Zone 3a and 3b. It is suggested for 1.h) that all developments with a net gain of one or more dwellings should require Sustainable Drainage Systems. The Council's Climate Emergency & Sustainability Strategy requires "Surface Water Drainage Strategies" for all major development.		<ul style="list-style-type: none"> No new dwellings in Flood Zone 3a/ 3b. Developments with a net gain of one or more dwellings should require Sustainable Drainage Systems 	Noted	None
P1_00_137	Yes	With an increased area of building's the above all needs to be put into place		<ul style="list-style-type: none"> Agree with approach. Needs to be put into place. 	Noted	None
P1_00_140	Yes	Agree on points		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00_142	No	.		<ul style="list-style-type: none"> Do not agree with approach but no reasons given. 	Noted	None
P1_00_144	Yes	Good measure		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00_145		No. I do not think the preferred Policy Option for Flood Risk and Water Resources has gone far enough. Surely you also should be highlighting that ground water protection zone 1 areas should be protected and not built on at any cost! There are plenty of areas that are not zone 1 within the district and these should be used first, as can be seen in this map. With climate change, water will become an ever-increasing precious resource, so we should be protecting our supply of it as much as possible. So far we have been lucky and TRD has avoided flash flooding, such as occurred in Germany on the 15th July, but with climate change, such extreme weather is only going to become more frequent. Quote from page 18 'Dealing with the effects of extreme weather and potential flood risk through appropriate design and siting of development. '		<ul style="list-style-type: none"> Do not agree with approach; Should highlight that ground water protection Zone 1 should be protected and not built on at any cost; Plenty of areas not in Zone 1 which could be used; If concerned about climate change, under no circumstances should areas of significant flood risk be developed. Such areas have been identified in TRDC Level 2 SFRA (Nov 2019) – Have been listed; 	Noted	None

			<p>If you are truly concerned about climate change (which you should be) it must be written in that under no circumstances should areas of significant flood risk be built on. Such areas were identified in the Three Rivers District Council Level 2 Strategic Flood Risk Assessment Sites. Nov 2019 report:</p>  <p>© Crown copyright and database right (2018) Data obtained from the Ordnance Survey Licence #10</p> <p>West Hertfordshire Groundwater Source Protection Zone</p> <ul style="list-style-type: none"> Zone I - Inner Protection Zone Zone II - Outer Protection Zone Zone III - Total Catchment <table border="1"> <thead> <tr> <th>Site Code</th> <th>Site Name</th> </tr> </thead> <tbody> <tr><td>CFS12</td><td>Kebbell House, Delta Gain</td></tr> <tr><td>CFS32</td><td>Lynsters Farm, Uxbridge Road, Meple Cross</td></tr> <tr><td>CFS33</td><td>Land North of Maple Lodge, Denham Way</td></tr> <tr><td>CFS38A</td><td>Colne Mead, Uxbridge Road, Mill End</td></tr> <tr><td>CFS39A</td><td>Land South of Tolpits Lane</td></tr> <tr><td>CFS39B</td><td>Land East and North West of Merchant Taylors</td></tr> <tr><td>CFS55</td><td>Land at Station Road, Kings Langley</td></tr> <tr><td>CFS64</td><td>Land South of Chalfont Lane, West Hyde</td></tr> <tr><td>CFS67</td><td>Land Adjacent to Oxhey Hall</td></tr> <tr><td>CFS70</td><td>Croxley Business Park Extension</td></tr> <tr><td>CFS71</td><td>Land Rear of Kings Head, Hunton Bridge</td></tr> <tr><td>ACFS8B</td><td>Flowerhouse, 2-3 Station Road, Kings Langley</td></tr> <tr><td>CFS38B</td><td>Land South of The Waterside</td></tr> <tr><td>CFS42</td><td>Land at Rear of 59-99 Elbury Road, Rickmansworth</td></tr> <tr><td>CFS43</td><td>North of Moor Lane</td></tr> <tr><td>CFS60</td><td>Affinity Water Depot, Church Street, Rickmansworth</td></tr> <tr><td>PCS36</td><td>Land Opposite Alpine Press, Kings Langley</td></tr> <tr><td>PSCF58a</td><td>Moor Park Golf Course, 1 Sandy Lodge Road</td></tr> <tr><td>PSCF59</td><td>Land to the east of Church Street</td></tr> <tr><td>PSCF55</td><td>West Hyde Nursery, Old Uxbridge Road</td></tr> </tbody> </table>	Site Code	Site Name	CFS12	Kebbell House, Delta Gain	CFS32	Lynsters Farm, Uxbridge Road, Meple Cross	CFS33	Land North of Maple Lodge, Denham Way	CFS38A	Colne Mead, Uxbridge Road, Mill End	CFS39A	Land South of Tolpits Lane	CFS39B	Land East and North West of Merchant Taylors	CFS55	Land at Station Road, Kings Langley	CFS64	Land South of Chalfont Lane, West Hyde	CFS67	Land Adjacent to Oxhey Hall	CFS70	Croxley Business Park Extension	CFS71	Land Rear of Kings Head, Hunton Bridge	ACFS8B	Flowerhouse, 2-3 Station Road, Kings Langley	CFS38B	Land South of The Waterside	CFS42	Land at Rear of 59-99 Elbury Road, Rickmansworth	CFS43	North of Moor Lane	CFS60	Affinity Water Depot, Church Street, Rickmansworth	PCS36	Land Opposite Alpine Press, Kings Langley	PSCF58a	Moor Park Golf Course, 1 Sandy Lodge Road	PSCF59	Land to the east of Church Street	PSCF55	West Hyde Nursery, Old Uxbridge Road	•		
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P1_00 147	Yes	It's a good policy		• Agree with approach	Noted	None																																										
P1_00 148	Yes	Controlling flooding and maintaining water resources are going to become increasingly vital as global warming takes hold.		• Agree with approach	Noted	None																																										
P1_00 150	No	I do not entirely agree this is the right response. The supporting text clearly recognises that Three Rivers is an area of serious water stress and there is a need to consider the protection of water resources and water quality. This is mostly reflected in the detailed policies in Section 2, which are welcomed. However, specific reference could be made for the need to protect aquifers this is particularly important to Three Rivers. The reference to biodiversity, as in sub-paragraph (n), could also be strengthened. The protection of aquifers, springs, seasonal bournes, and ponds, which are important water resources, is also critical for the conservation of flora and fauna. Although the importance of the Rivers Colne, Gade and Chess as surface water resources are mentioned in paragraph 7.36, their key role, together with their tributaries, as chalk stream habitats is not covered. These are priority habitats under Section 41 of the Natural Environment and Rural Communities Act 2006. The need to protect these habitats and their dependant species therefore should be emphasised in the policies, cross-referenced to Preferred Policy Options 19 Green and Blue Infrastructure and 21 Biodiversity. In addition, the water saving measures listed in para 2m should be mandatory and there is no reference to potential future water shortages or the requirements of NPPF paras 174 and 175 concerning the conservation, restoration and enhancement of priority habitats.		<ul style="list-style-type: none"> • Specific reference to aquifers is needed; • Reference to biodiversity under sub-paragraph n could be strengthened; • Whilst importance of Rivers Colne, Gade and Chess as surface water resources are mentioned in para 7.36, their key role, together with their tributaries, as chalk stream habitats is not covered; • Water saving measures listed in para 2m should be mandatory; • No reference to potential future water shortages or requirements; • NPPF paras 174 and 175 are also not referenced. 	Noted	None																																										
P1_00 151	Yes	Because we know there are parts of Three Rivers at risk of flooding.		• Agree with approach	Noted	None																																										
P1_00 154	Not Stated	28. The Associations are in general support of Preferred Policy Option 15 which is comprehensively justified by the supporting text in paragraphs 7.25 – 7.39. With regards to flood risk, the Associations agree that policies specific to Three Rivers were essential, fully supported by the Level 1 Strategic Flood Risk Assessment. These are fully compliant with the NPPF and recognise the characteristics of the District and the local levels of flood risk. It is suggested that the policy could		• Policy could mention merits of working with landowners to deliver natural forms of flood control such as hedges and ditches.	Noted	None																																										

			<p>mention the merits of working with landowners to deliver natural forms of flood control such as hedges and ditches. In addition, the need to assess surface water flooding needs to be factored into development management policies.</p> <p>29. The supporting text clearly recognises that Three Rivers is an area of serious water stress and there is a need to consider the protection of water resources and water quality. This is mostly reflected in the detailed policies in Section 2, which are welcomed by the Associations. It is considered, however, that a specific reference could be made for the need to protect aquifers – this is particularly important to Three Rivers. The reference to biodiversity, as in sub-paragraph (n), could also be strengthened. The protection of aquifers, springs, seasonal bournes, and ponds, which are important water resources, is also critical for the conservation of flora and fauna.</p> <p>30. Although the importance of the Rivers Colne, Gade and Chess as surface water resources are mentioned in paragraph 7.36, their key role, together with their tributaries, as chalk stream habitats is not covered. These are priority habitats under Section 41 of the Natural Environment and Rural Communities Act 2006. The need to protect these habitats and their dependant species therefore should be emphasised in the policies, cross-referenced to Preferred Policy Options 19 Green and Blue Infrastructure and 21 Biodiversity.</p>	<ul style="list-style-type: none"> • Need to assess surface water flooding needs to be factored into development management policies; • Specific reference to aquifers is needed; • Reference to biodiversity under sub-paragraph n could be strengthened; • Whilst importance of Rivers Colne, Gade and Chess as surface water resources are mentioned in para 7.36, their key role, together with their tributaries, as chalk stream habitats is not covered; 		
P1_00 155	Yes	This covers both the areas of building and also considers the introduction of practical components into the buildings themselves	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 157	No	There is no specific reference to protecting aquifers, something that is particularly important to Three Rivers, as well as improving biodiversity. Springs and ponds are also important water resources as well as being critical for flora and fauna conservation. Chalk streams such as the rivers Colne, Gade and Chess should be protected as they are so important for their dependent species. The water saving measures are something that everyone should be aware of and should be mandatory,	<ul style="list-style-type: none"> • Specific reference to aquifers is needed; • Chalk streams such as Rivers Colne, Gade and Chess as surface water resources should be protected 	Noted	None	
P1_00 160	Not Stated	The Council notes that, "many existing water mains and sewerage systems are increasingly becoming overloaded by successive development. It is therefore important that new development is served by an adequate means of water supply and sufficient foul and surface water drainage and adequate provision must be made for water supply and sewerage infrastructure." There are currently serious problems in the Maple Cross area and it is imperative that no planning permission will be given unless the infrastructure can cope. Assurances and remedial action must be put in place first.	<ul style="list-style-type: none"> • Whilst policy recognised there are serious issues with water supply/ foul sewage, are currently serious issues in Maple Cross and no planning permission should be granted unless infrastructure can cope. 	Noted	None	
P1_00 162	Yes	This seems sensible	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 164	Yes	I built a house a few years ago with a 36 cubic metre underground water storage tank which collects the rain water from roof, balcony and the paved terrace; pumped up to a 3000 litre holding tank on the top floor. It supplies, through 2 filters, all the water for the 4 bedroom house apart from a tap on the kitchen sink, and most years there is no need to top up the tank from the mains in the summer. Not difficult to organise on a new build, so it is a good thing to aim for.	<ul style="list-style-type: none"> • Have achieved water tank storage on respondent's property, not a difficult to do on new build properties and is something to aim for. 	Noted	None	
P1_00 166	Yes	But even better not to build on green belt land and then there would not be risk of flooding	<ul style="list-style-type: none"> • Agree with approach 	Noted	None	
P1_00 167	Not Stated	If these are known issues – why is TRDC promoting site choices on source 1 protection zones in areas where the sewerage system is a known problem?	<ul style="list-style-type: none"> • If known issues why is TRDC promoting site on Groundwater Source 1 protection zones? 	Noted	None	
P1_00 170	No	"Climate change MAY result in drier summers and warmer, wetter winters". The driest summer was the year of the great drought in 1976, and a lot of carbon has been pumped into the atmosphere since then. The recent summer flash flooding in parts of London also call into question the certainty implied by the use of will regarding the drier summers statement. More extreme climate events would be a better use of language. h) Should be mandatory for all new developments, whatever their size. 2) Water Resources Why is the Council only supporting development where? It should be insisting upon these measures, the plan is not stringent enough in its mandatory requirements, given that "Three Rivers is an area of serious water stress (as classified by the Environment Agency), so reducing water Consumption levels is important."	<ul style="list-style-type: none"> • Do not agree with 'drier summers' statement, should be changed to 'extreme climate events'; • Point h – Should be mandatory for all developments, regardless of size; • Water limits of 110 litres per person per day should be mandatory requirements, given that Three Rivers is an area of serious water stress. 	Noted	None	
P1_00 174	Yes	Agree. Although the water saving measures listed in paragraph 2m (rainwater harvesting, water butts, water efficient appliances etc.) should be mandatory given the water scarcity in Summer that climate change is projected to bring locally. 7.34 is good to see, but there is no mention of preventing existing development/housing from paving over driveways with impermeable surfacing which exacerbates Local flood risks.	<ul style="list-style-type: none"> • Agree with approach. Water saving measures should be mandatory. • Para 7.34 – Agree but no mention of preventing existing housing paving driveways with impermeable surfacing 	Noted	None	
P1_00 181	Not Specified	The water resources section should recognise the importance of the Chilterns chalk streams, such as the Chess and Gade. These are suffering from over-abstraction of water, which leads to low flows and harm to important biodiversity. New developments need to utilise alternative sources of water supply, such as the transfer scheme from Grafham Water being developed by Affinity Water. All measures to reduce the use of water in new developments will help in managing the demand for water in an area of high water stress. Where developments are proposed close to the chalk streams, we would expect biodiversity enhancements to be made through Biodiversity Net Gain or S106 agreements. Priority should be given to enhancements to the corridors of the chalk streams and to linking other habitats to the river corridors to create local networks and contribute to nature recovery.	<ul style="list-style-type: none"> • Chalk streams such as Rivers Colne, Gade and Chess as surface water resources should be protected, as suffering from over-extraction, low flows which harms biodiversity.; • Where development is near a chalk stream, biodiversity enhancements would need to be made; • Chess is polluted by overflow from a sewage plant; response from Thames Water has been slow and ineffective; 	Noted	None	

			The River Chess is frequently polluted by an overflow from a sewage plant and the response from Thames Water has been slow and ineffective. The wastewater processing plant near Mill End is understood to be at full capacity.	<ul style="list-style-type: none"> Wastewater treatment works at Mill End are at full capacity. 		
P1_00 183	Yes	As above		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 184	No	NO new 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.	<ul style="list-style-type: none"> No development within Flood Zone 3; Development in flood zones should be capable of surviving flooding and provide as much flood detention and retention storage as possible. Ensure no surface water runoff from front gardens. 	Noted		None
P1_00 186	No	This area struggles already with flooding. Increasing the stress on the area will only have a negative impact.	<ul style="list-style-type: none"> Area already struggling with flooding, increasing stress on the area will only have a negative impact. 	Noted		None
P1_00 187	No	NO new 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.	<ul style="list-style-type: none"> No development within Flood Zone 3; Development in flood zones should be capable of surviving flooding and provide as much flood detention and retention storage as possible. Ensure no surface water runoff from front gardens. 	Noted		None
P1_00 189_	Yes	Yes, but hardstanding such as driveways and other construction should be forbidden from diverting water straight into storm drains and sewers should be included.	<ul style="list-style-type: none"> Agree with approach but hardstanding driveways should not be allowed. 	Noted		None
P1_00 190	Yes	Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted		None
P1_00 191	Yes	see previous comments about HS2 drilling equipment	<ul style="list-style-type: none"> Agree with approach 	Noted		None
P1_00 196	No	The key role of our three rivers and tributaries as chalk stream habitats is not covered in Polices. These are ~priority habitats” under Section 41 of the Natural Environment & Rural Communities Act 2006 and should therefore be emphasised in polices and cross referenced to Policy Options on Green & Blue Infrastructure and Biodiversity.	<ul style="list-style-type: none"> Key role of the three rivers as chalk streams is not highlighted and needs to be done. 	Noted		None
P1_00 201	Yes	Infrastructure should be improved to deal with it	<ul style="list-style-type: none"> Infrastructure should be improved to deal with issue. 	Noted		None
P1_00 205	No	Flood risk condition i) should require greater evaluation and protection of existing housing and surroundings to ensure that there is NO danger of new development increasing the existing flood risk. This should include evaluation of loss of soakaways on existing roads already subject to excess water during rain. There are already areas in the district which regularly suffer from flooding and deep water pooling which remains for days following rainfall affecting the safety for users.	<ul style="list-style-type: none"> Flood Risk condition requires greater elevation and protecting of existing housing and surrounding; Existing flooding needs to be addressed before anymore development 	Noted		None
P1_00 206II	Yes	NA	<ul style="list-style-type: none"> Agree with approach 	Noted		None
P1_00 209	No	Due to climate change, the flood risk is not only evident in wetter winters. Summers, and the extra rainfall as seen over recent years, are getting more extreme. Concreting over green belt land that acts as a sponge. As most of Herts water supply comes from underground aquifers, intense rainfall does nothing to help store extreme heavy rainfall as it simple runs off the ground into the sewers (or into people's homes) and away in to the rivers thus leading to water shortages and hose pipe bans as also seen in recent years. If the first paragraph above 'Local Planning Authorities have always been required to consider the need to avoid the location of certain types of development in areas which are at the highest risk of flooding' then the LPA has already failed.	<ul style="list-style-type: none"> Concerting over Green Belt that acts as a sponge will lead to more issues; If first paragraph above 'Local Planning Authorities have always been required to consider need to avoid location of certain types of development in areas which are at highest risk of flooding' then the LPA has already failed. 	Noted		None
P1_00 211	No	No new dwellings should be allowed in Flood Zone 3a and 3b.	<ul style="list-style-type: none"> No new dwellings in Flood Zone 3a and 3b. 	Noted		None
P1_00 213	No	I don't understand it	<ul style="list-style-type: none"> Do not understand it. 	Noted		None
P1_00 215	Yes	But you don't seem to do this. So what's the point of laying out a plan or approach when you don't stick to it? I.e. New houses recently built in kings Langley were almost flooded even before people moved in. For years that area has flooded and the locals have said not to build there because of flooding. But they were ignored. So why lay out a plan when it just doesn't get followed.	<ul style="list-style-type: none"> Agree with approach but do not seem to do this i.e. new houses in Kings Langley which flooded even before people moved in. 	Noted		None
P1_00 218	Yes	Yes in the main. The local plan seems to be very strong on flood risk management, but the recent flooding on Primrose Hill, near some new properties shows how very finely balanced such decisions are, in the flood plain, when the opportunity for water to infiltrate into the soil is removed, then flood risk is increased and there needs to be sufficient allocation of space for sustainable urban drainage systems to be installed, so that they are able to do their job in heavy rain. The component of this policy about the use of grey water and waste water is key our three rivers are vulnerable to over-abstraction and drought conditions in this time of climate change, so maybe the wording here could be tightened and TRDC could express higher expectations of new buildings and their water conservation potential Indeed making them mandatory?	<ul style="list-style-type: none"> Agree in principle; Recent flooding on properties near Primrose Hill shows how finely balanced the issue is; Wording could be tightened with higher expectations of new buildings and water conservation potential, make this mandatory. 	Noted		None
P1_00 219	Yes	Appropriate	<ul style="list-style-type: none"> Agree with approach 	Noted		None

P1_00 220			<p>6. The Associations are in general support of Preferred Policy Option 15 which is comprehensively justified by the supporting text in paragraphs 7.25 – 7.39. With regards to flood risk, the Associations agree that policies specific to Three Rivers were essential, fully supported by the Level 1 Strategic Flood Risk Assessment. These are fully compliant with the NPPF and recognise the characteristics of the District and the local levels of flood risk. It is suggested that the policy could mention the merits of working with landowners to deliver natural forms of flood control such as hedges and ditches. In addition, the need to assess surface water flooding needs to be factored into development management policies.</p> <p>7. The supporting text clearly recognises that Three Rivers is an area of serious water stress and there is a need to consider the protection of water resources and water quality. This is mostly reflected in the detailed policies in Section 2, which are welcomed by the Associations. It is considered, however, that a specific reference could be made for the need to protect aquifers – this is particularly important to Three Rivers. The reference to biodiversity, as in sub-paragraph (n), could also be strengthened. The protection of aquifers, springs, seasonal bournes, and ponds, which are important water resources, is also critical for the conservation of flora and fauna.</p> <p>8. Although the importance of the Rivers Colne, Gade and Chess as surface water resources are mentioned in paragraph 7.36, their key role, together with their tributaries, as chalk stream habitats is not covered. These are priority habitats under Section 41 of the Natural Environment and Rural Communities Act 2006. The need to protect these habitats and their dependant species therefore should be emphasised in the policies, cross-referenced to Preferred Policy Options 19 Green and Blue Infrastructure and 21 Biodiversity.</p>	<ul style="list-style-type: none"> Policy could mention merits of working with landowners to deliver natural forms of flood control such as hedges and ditches. Need to assess surface water flooding needs to be factored into development management policies; Specific reference to aquifers is needed; Reference to biodiversity under sub-paragraph n could be strengthened; Whilst importance of Rivers Colne, Gade and Chess as surface water resources are mentioned in para 7.36, their key role, together with their tributaries, as chalk stream habitats is not covered; 	Noted	None
P1_00 221		Not stated	The key role of our three rivers and tributaries as Chalk Streams is not covered in policies!!!	<ul style="list-style-type: none"> Key role of the three rivers is not covered in the policy 	Noted	None
P1_00 222		No	<p>No new dwellings should be allowed in Flood Zone 3a and 3b. It is suggested for 1.h) that all developments with a net gain of one or more dwellings should require Sustainable Drainage Systems. The Council's Climate Emergency & Sustainability Strategy requires 'Surface Water Drainage Strategies' for all major development. A policy stating the maximum area of impermeable hardstanding for a front driveway and encouragement of rain gardens that slow the flow of surface water into storm drains and sewers should be included. Guidance and best practice for homeowners should be made clearly available.</p> <p>The supporting text recognises that Three Rivers is an area of serious water stress and there is a need to consider the protection of water resources and water quality. However, it is considered, that a specific reference could be made for the need to protect aquifers.</p>	<ul style="list-style-type: none"> No new dwellings in Flood Zone 3; Developments with a net gain of one or more dwellings should require Sustainable Drainage Systems Specific reference to protecting aquifers needs to be made. 	Noted	None
P1_00 223		Yes	It covers most things.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 224		Yes	it seems in order	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 227		No	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.	<ul style="list-style-type: none"> No development within Flood Zone 3; Development in flood zones should be capable of surviving flooding and provide as much flood detention and retention storage as possible. Ensure no surface water runoff from front gardens. 	Noted	None
P1_00 230		Not Stated	<p>1. The policy should mention working with landowners to deliver natural forms of flood control such as hedges and ditches. This is especially necessary in rural areas where run off from fields can cause flooding on roads.</p> <p>2. More prominence needs to be given to evaluating surface water flooding generally as it is a complex issue depending on the unique character of a site and can be very serious on some sites leading to potential problems for new and existing homes. Assessments need to be done at appropriate times of the year and may need repeated visits to sites.</p> <p>3. The need to protect aquifers should be stated. Damage to aquifers could cause problems for housing and the environment.</p> <p>4. The need to protect aquifers, springs, seasonal bournes and ponds should be stated. These are all important water resources and critical parts of a habitat,</p> <p>5. As assessment needs to be made of the water resources of habitats to assess potential damage and address any conservation needs. The wider network of water sources such as spring lines and ponds also need to be assessed and conserved.</p>	<ul style="list-style-type: none"> Mention working with landowners; More prominence to evaluation surface water flooding generally; Need to protect aquifers needs to be stated; Need to protect springs, seasonal bournes and ponds should be stated; Assessment needs to be made of water resources of habitats to assess damage and conservation needs. 	Noted	None
P1_00 232		No	No new dwellings should be allowed in Flood Zone 3a and 3b. A policy stating the maximum area of impermeable hardstanding for a front driveway and encouragement of rain gardens that slow the flow of surface water into storm drains and sewers should be included. Guidance and best practice	<ul style="list-style-type: none"> No new dwellings in Flood Zone 3a or 3b; 	Noted	None

			for homeowners should be made clearly available. The supporting text recognises that Three Rivers is an area of serious water stress and there is a need to consider the protection of water resources and water quality. However, it is considered, that a specific reference could be made for the need to protect aquifers. The Water companies should be challenged to protect national resources.	<ul style="list-style-type: none"> • Three rivers is an area of serious water stress; • Water companies should be challenged to protect national resources. 		
P1_00 233	Yes	I agree that Preferred Policy Option for Flood Risk and Water Resources is the right approach. However greater emphasis should be taken on reducing flood risk to existing developments and dwellings, not just new proposed sites.		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 234	Yes	I agree that Preferred Policy Option for Flood Risk and Water Resources is the right approach. However greater emphasis should be taken on reducing flood risk to existing developments and dwellings, not just new proposed sites.		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 236	Yes	Stipulations make sense		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 240r	Yes	Yes		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 241	Yes	1.7. Yes, it is the correct approach. 1.8. Increased risk of flooding is a fact. Therefore, there should be no new development in Flood Zone 3b. If anything, the policy approach could be stronger. The introduction of impermeable surfaces in green infrastructure, where no development currently exists, on the banks of rivers could increase the risk of flooding for existing development in these locations. Sustainable Drainage Systems do not work where river flooding is already a risk. 1.9. This preferred policy option should have been carried through to Part 2 of this consultation and applied appropriately to sites for potential allocation.		<ul style="list-style-type: none"> • Agree with approach; • No further development in Flood Zone 3b; • Sustainable Drainage Systems do not work where flooding is already a risk. • 1.9. This preferred policy option should have been carried through to Part 2 of this consultation, applied appropriately to sites for potential allocation. 	Noted	None
P1_00 244	Yes	Water is a crucial factor.		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 250	Yes	Local Plan Regulation 18 (Part 1) Preferred Policy Options Consultation June 2021 These representations are submitted by Iwan Jones, Managing Director of JIG Planning & Development Ltd, on behalf of the landowner of the land to the north of Chalfont Lane, Maple Cross identified as site EOS12.3 within Part 2 of the Local Plan Regulation 18 Sites for Potential Allocation. Due to the Potential impacts of climate change it is vital that water quality is enhanced and that development makes efficient use of water resources. It is essential for development to protect and where possible enhance water quality. Planning policy should be expected to recognise and encourage the incorporation of water efficiency measures into developments. The efficient use of water resources, including water re-use and recycling, should be sought through sustainable construction methods (such as rainwater harvesting) that conserve and make prudent use of water and other natural resources. We are therefore pleased to note that the Council will support development where: the quantity and quality of surface and groundwater resources are protected from pollution and where possible enhanced; efficient use is made of water resources in new development; rainwater harvesting techniques are proposed; harvesting and recycling greywater is incorporated into the development; water efficient landscaping is proposed; and new development adjacent to watercourses should seek to restore rivers to their natural state, including through de-culverting piped watercourses. We note that the Interim Sustainability Appraisal Report June 2021 identified significant positive effects in relation to this Preferred Policy Option when assessed against the sustainability objectives.		<ul style="list-style-type: none"> • Essential for development to protect and enhance water quality; • Make efficient use of water resources; • General agreement with approach 	Noted	None
P1_00 256	Yes	Seems reasonable		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 260	Not Stated	The key role of our three rivers and tributaries as chalk stream habitats is not covered in Policies. These fall under Natural Environment & Rural Communities act 2006 and should therefore be emphasised in policies and cross referenced to Policy and Biodiversity.		<ul style="list-style-type: none"> • Key role of rivers as chalk streams is not highlighted in the plan 	Noted	None
P1_00 262	No	No further loss of biodiversity next to the canal caused by residential moorings deforestation. Water saving options should be made compulsory as part of building control compliance.		<ul style="list-style-type: none"> • No further loss of biodiversity next to canal caused by residential mooring deforestation. 	Noted	None
P1_00 264	Not stated	7.36 A DRQA must accompany a planning application for any major development within a GSPZ1 Reason: Our water is a resource that will become even more precious due to climate change, we must not allow it to be compromised by development we must plan for future generations.		<ul style="list-style-type: none"> • A DRQA must accompany a planning application for any major development within a GSPZ1 	Noted	None
P1_00 268	No	It won't be enough to quote possible ideas such as rain harvesting to be incorporated within developments. If Three Rivers values its water resources, then these should all be incorporated as mandatory or minimum requirements.		<ul style="list-style-type: none"> • Targets need to be mandatory. 	Noted	None
P1_00 271	Yes	Seems sensible		<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00 278	No	There is already severe flooding in Carpenders Park and Oxhey Lane. This has been the case for many years and Council have been unable to address the issue to date. They are now proposing to build on greenbelt on Oxhey Lane and Little Oxhey Lane which would make the flooding in Carpenders Park much worse.		<ul style="list-style-type: none"> • Already severe flooding in Carpenders Park and Oxley Lane and Council cannot address issue. Made worse by building on Green Belt Land. 	Noted	None

P1_00 279	No	The key role of our three rivers and tributaries as chalk stream habitats is not covered in Polices. These are 'priority habitats' under Section 41 of the Natural Environment & Rural Communities Act 2006 and should therefore be emphasised in polices and cross referenced to Policy Options on Green & Blue Infrastructure and Biodiversity.	<ul style="list-style-type: none"> Key role of rivers as chalk streams is not highlighted in the plan 	Noted	None
P1_00 282	No	Enough. Too many questions not enough time before the deadline!!	<ul style="list-style-type: none"> Too many questions. 	Noted	None
P1_00 287	No	There has been a lot of flooding locally and a lot of water leaks which have led to the River Chess being contaminated with sewage. This must be sorted out before putting houses into these areas. The key role of our three rivers and tributaries as chalk stream habitats is not covered in Polices. These are priority habitats under Section 41 of the Natural Environment & Rural Communities Act 2006 and should therefore be emphasised in polices and cross referenced to Policy Options on Green & Blue Infrastructure and Biodiversity.	<ul style="list-style-type: none"> Must resolve pollution getting into River Chess and flooding before further development 	Noted	None
P1_00 301	Not Stated	<p>The Chilterns Conservation Board strongly supports the principles being promoted through Preferred Policy Option 15, and consider that it currently provides an adequate approach to the issues it seeks to address. We note that the suite of policies here is more enlightened and effective than in many local plans. Even so, it could be enhanced.</p> <p>Watercourses – specifically the three globally significant chalk streams of the Colne, Gade and Chess – define the identity of Three Rivers District. In our view the positive management and conservation of these watercourses, along with the Grand Union Canal and the chalk aquifer, deserves to be celebrated, and particularly to be considered separately from the more negative associations of flooding and waste-water management. Doing so would also make this section less complicated (and note also the overlaps with other policies highlighted subsequently in our response). The Chilterns Conservation Board considers that, given its name and its wealth of these watercourses, Three Rivers District Council could aspire to be a beacon of best practice for the conservation and Management of chalk streams and we would be delighted to work with you on developing policy further in this area to enhance/replace current paragraph (n) of the policy. A reasonable starting point could be the adopted policy in the Wycombe Delivery and Site Allocations Plan (adopted in 2013, reviewed in 2019, and now part of the development plan for Buckinghamshire Council), which can be downloaded here. Policy DM15 of that plan is reproduced here as a basis for discussion.</p> <p>POLICY DM15 PROTECTION AND ENHANCEMENT OF RIVER AND STREAM CORRIDORS</p> <ol style="list-style-type: none"> 1. Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor. 2. Development should seek to conserve and enhance the biodiversity, landscape and Recreational value of the watercourse and its corridor through good design. 3. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of Watercourses and which do not prejudice future opportunities for de-culverting (including on sites specifically identified in High Wycombe town centre). 4. Development proposals adjacent to or containing a watercourse should provide or retain a 10m buffer between the top of the river bank and the development, and include a long term landscape and ecological management plan for this buffer. <p>Our understanding of chalk streams, their benefits and the pressures they are under from Development has developed since 2013, and the context in Three Rivers (which also includes the Grand Union Canal) will be different from that in Wycombe, so this policy would need to be adapted to fit.</p> <p>Note that there is overlap between criterion (2)(n) of this PPO and (2)(a) of PPO19 (Green and Blue Infrastructure).</p>	<ul style="list-style-type: none"> Agree with approach; Three Rivers could aspire to be a beacon of best practice; Reasonable starting point would be to look at adopted Policy DM15 from Wycombe Delivery and site allocations plan. 	Noted	None
Q16.Should we have considered alternative options?					
P1_00 014	Yes	As before	<ul style="list-style-type: none"> Agree with approach but past decisions were flawed and do not fill with confidence. 	Noted	None
P1_00 017	Yes	Mandatory requirements.	<ul style="list-style-type: none"> Make it mandatory. 	Noted	None
P1_00 020	Yes	Continue exploring new technology and options available in this area.	<ul style="list-style-type: none"> Explore new technology and options in the area 	Noted	None
P1_00 023	Yes	The SFRA was deficient in that it did not take account of recent and historic flooding data provided by residents and was not based on the most recent Environment Agency Historic Flood map. Consequently, important evidence of local flooding was not included in the areas defined as being in Flood Zone 3b. This has resulted in areas which regularly flood from the River Colne (e.g. fields north of Moor Lane) being excluded from the functional flood plain while other areas with no recent history of flooding have been included (e.g. Veolia water works). This needs to be corrected to ensure the appropriate application of prohibited development within designated flood zones 3b.	<ul style="list-style-type: none"> SFRA does not take account of recent/historic data from residents, nor based on latest EA map; Results in areas which frequently flood from River Colne (e.g. fields north of Moor Lane); Correct accordingly. 	Noted	None
P1_00 025	Yes	Not green belt	<ul style="list-style-type: none"> Do not develop Green Belt 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However,	None

					even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	
P1_00 041	Yes	They should have never put in a possible permission to building on land subject to flooding.	• Cannot give permission to build on land subject to flooding.	Noted	None	
P1_00 049	Yes	A tiered approach so that standards can be raised as developments occur.	• Adopt a tiered approach	Noted	None	
P1_00 053	Yes	Stricter Rules	• Need stricter rules	Noted	None	
P1_00 055	Yes	Opposing larger developments and refusing to give permission for concrete driveways	• Oppose larger developers and do not allow permission for concrete driveways	Noted	None	
P1_00 056	Yes	See above comments	• Agree with approach. Developers must be mandated to make adequate/ readily maintainable provision for surface drainage (Para 7.39). • Para 7.40 should explain why a 'Strategic Flood Risk Assessment' has not been provided or is 'not realistic'.	Noted	None	
P1_00 057	Yes	Choose areas that are not already prone to flooding.	• Choose areas not prone to flooding.	Noted	None	
P1_00 064	Yes	If building in a flood plain, think about building on stilts and fix sewage rising up issues	• If building in flood plan, build on stilts and prevent sewage rising up	Noted	None	
P1_00 066	Yes	Ensure any new development uses its own natural water supplies	• Ensure any development uses own natural water supplies.	Noted	None	
P1_00 068	Yes	You should make sure that a flood is really a FLOOD and not some blocked drains that your lacklustre highways crew haven't bothered cleaning for years.	• Make sure a flood really is a flood and not due to blocked drains that the highways crew have not cleared.	Noted	None	
P1_00 102	Yes	Ensure that every new property built achieves a BREEAM Excellent rating for water efficiency. Developers who do not properly protect their developments from flooding should be forced to buy back their properties from the owner for full market value and compensate them for property and possessions damage.	• Ensure new properties achieve a BREEAM Excellent rating for water efficiency; • Developers who do not properly protect their developments from flooding.	Noted	None	
P1_00 107	Yes	Upgrade infrastructure before embarking on any large scale building plans, and allow appropriate safety margins.	• Upgrade infrastructure before embarking on large scale building plans.	Noted	None	
P1_00 108	Yes	Refuse to build in water-logged areas until you have adequately dealt with the problem of surface water	• Refuse to build in water-logged areas	Noted	None	
P1_00 113	Yes	No idea	• No alternatives suggested	Noted	None	
P1_00 117	Yes	Avoid Flooding	• Avoid flooding	Noted	None	
P1_00 119	Yes	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	• Land is sanctuary for wildlife.	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None	
P1_00 131	Yes	See above	• Does not take account of climate change and not relevant if only based on historic flood risk calculations.	Noted	None	
P1_00 132	Yes	get environment agency advice	• Get environment agency advice.	Noted	None	

P1_00 135	Yes	A policy stating the maximum area of impermeable hardstanding for a front driveway and encouragement of rain gardens that slow the flow of surface water into storm drains and sewers should be included. Guidance and best practice for homeowners should be made clearly available.	<ul style="list-style-type: none"> Policy stating maximum area of impermeable hardstanding for a front driveway and encouragement of more gardens. 	Noted	None
P1_00 142	Yes	.	<ul style="list-style-type: none"> No alternatives suggested. 	Noted	None
P1_00 144	Yes	Promote solar generation, communal sharing and household grey water schemes. Insist a large proportion of houses have integrated grey water systems - see USA and New Zealand	<ul style="list-style-type: none"> Promote solar generation, communal sharing and household grey water schemes. 	Noted	None
P1_00 170	Yes	Additional Proposals rather than alternatives are: - Electrical Installations shall be resilient to flood risk with as a minimum, all floor socket outlets raised to a height of 1.5 metres above ground floor levels. Incoming power lines and electricity meters shall also be terminated at or above this height. This would also benefit senior citizens who may have difficulty with the traditional skirting board mounts.	<ul style="list-style-type: none"> Need additional proposals rather than alternatives. Electric points should be 1.5m above the ground. 	Noted	None
P1_00 183	Yes		<ul style="list-style-type: none"> No alternatives suggested. 	Noted	None
P1_00 191	Yes	There should be detail about protecting the virtually unique habitat of our chalk streams	<ul style="list-style-type: none"> Details about protecting unique habitat of chalk streams. 	Noted	None
P1_00 201	Yes		<ul style="list-style-type: none"> No alternatives suggested. 	Noted	None
P1_00 205	Yes	See comment above	<ul style="list-style-type: none"> Flood Risk condition requires greater elevation and protecting of existing housing and surrounding; Existing flooding needs to be addressed before anymore development 	Noted	None
P1_00 209	Yes	It is for councillors to consider sensible, alternative options and proposal a range of those options	<ul style="list-style-type: none"> For councillors to consider alternatives. 	Noted	None
P1_00 215	Yes	Work with the environment not against it.	<ul style="list-style-type: none"> Work with environment not against it. 	Noted	None
P1_00 218	Yes	water conservation potential of new buildings	<ul style="list-style-type: none"> Conserve water in new buildings. 	Noted	None
P1_00 244	Yes	A statement about the contractual obligations of the water companies to ensure that this plan can be fully implemented. A more specific statement on SEWAGE.	<ul style="list-style-type: none"> Statement on water company obligations to ensure the plan can be fully implemented; More specific statement on sewage. 	Noted	None
P1_00 262	Yes	Cumulative effect of development on surface water run off should be monitored and charged to the developer accordingly. Water saving options should be made compulsory as part of building control compliance.	<ul style="list-style-type: none"> Cumulative effect of surface water run off should be monitored; Water saving options to be compulsory. 	Noted	None
P1_00 278	No	Improve on the current flooding that is happening today before thinking about any further developments	<ul style="list-style-type: none"> Resolve existing flooding issues before further development. 	Noted	None
P1_00 282	Yes	See above.	<ul style="list-style-type: none"> Too many questions. 	Noted	None
P1_00 284	No	The key role of our three rivers and tributaries as chalk stream habitats is not covered in Polices. These are 'priority habitats' under Section 41 of the Natural Environment & Rural Communities Act 2006 and should therefore be emphasised in polices and cross referenced to Policy Options on Green & Blue Infrastructure and Biodiversity.	<ul style="list-style-type: none"> Key role of the three rivers and tributaries as chalk streams not covered, but are priority habitats under 2006 Act. 	Noted	None

BIODIVERSITY TREES AND WOODLANDS AND LANDSCAPING

Q22. Do you think the Preferred Biodiversity, Trees, Woodlands and Landscaping is the right approach?						
SC_0003 1_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 	<ul style="list-style-type: none"> Support noted Policy does not distinguish between designated sites within or adjacent to TRDC – it applies to any designated site affected by development. No change required. Support noted. 	Change required to policy to reflect Environmental Act requirements in relation to 10% biodiversity net gain

P1_00 002		Yes	Would suggest as well as protect, any development should be required to enhance this habitat with significantly improved soft landscaping with maintenance regime.	<ul style="list-style-type: none"> Agree with approach but that developments enhance habitats with improved landscaping 	Noted	None
P1_00 003		Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00 005s		Yes	Nothing to add	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00 006		Yes	This is vital to conserve the area not only for aesthetic but also to ensure the pollution levels emitted by traffic on the motorways is reduced as much as possible.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 014		Yes	If we don't protect our biodiversity we all suffer as humans. Healthy natural organic environments reduce the need for man-made interventions.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 017		No	Not extensive enough - what about South Oxley and Oxley Lane?	<ul style="list-style-type: none"> Not extensive enough – does not take account of South Oxley/ Oxley Lane 	Noted	None
P1_00 019		No	If there is wildlife present no construction should take place. Why should animals be relocated to make way for houses on green belt land?	<ul style="list-style-type: none"> No construction should take place if wildlife is present 	Noted	None
P1_00 020		Yes	N/A	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 021		Yes	seems well planned	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 023		Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 024		Yes	We must protect these spaces	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 026		Yes	Clear Policy	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 027		No	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 are not disturbed. Years/decades of ecological development cannot simply be moved/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.	<ul style="list-style-type: none"> Statements are too vague and do not offer protection for wildlife and ecology 	Noted	None
P1_00 028		Yes	Ok	<ul style="list-style-type: none"> No Objection 	Noted	None
P1_00 032		Yes	It's the right approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 033		Yes	Where felling of a tree or removal is permitted, there should be a replacement at least double of the original tree. That way we cannot just maintain but improve on the woodlands, as there will be an increased damage to the woodlands and landscaping due to the increase of the local population.	<ul style="list-style-type: none"> Agree with approach; when removing a tree two should be planted in its place. 	Noted	
P1_00 034		Yes	No Comment	<ul style="list-style-type: none"> No Objection 	Noted	None
P1_00 036		Yes	We are so fortunate to have some swift populations and we all need to protect them for the future. With new buildings we are losing many of the favoured nesting sites. Therefore we want SWIFT	<ul style="list-style-type: none"> All developments should have swift boxes particularly areas favoured by 	Noted	None

			BRICKS OR BOXES IN ALL HOUSE EXTENSIONS IN THE AREAS FAVOURED BY SWIFTS. These areas are the Rickmansworth Town Centre and Mill End. ALSO NEW BUILDS COULD HAVE THESE SWIFT BRICKS INSTALLED AT THE TIME OF BUILDING. They are cheap bricks and the cost is negligible so there is little argument against installing them.	swifts (such as Rickmansworth and Mill End)		
P1_00 037	Not Specified		I would like to suggest that swift boxes should be put up in all new housing schemes and also where extensions are planned for existing properties. Rickmansworth is an ideal place to encourage swift numbers to increase after a decrease of numbers in the town centre. There is a flourishing population still in Mill End which needs protecting. Many towns and cities throughout the country are joining in a swift project as the numbers of swifts have halved in the country over the last twenty years. They are completely reliant on their nest sites being there, otherwise after their journey from Africa they are unable to breed. Where they are still found in the area, residents love them. They are only here for a short time, just two or three months, but their thrilling screaming flight is the sound of summer which we are in danger of losing unless we take some positive action to save them.	<ul style="list-style-type: none"> All developments should have swift boxes particularly areas favoured by swifts (such as Rickmansworth and Mill End) 	Noted	None
P1_00 038	Yes		Absolutely vital to protect the environment from further loss of habitat and to promote greater biodiversity	<ul style="list-style-type: none"> Support 	Noted	None
P1_00 040	No		Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> Do not develop Green Belt Land 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 041	Yes		Points 6 and 7 above are very important.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 045	Yes		Points 1 & 2 are especially important	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 046	Yes		Yes all is important	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 047	Yes		The policy is right. However, the Draft Local Plan sets out an aim to destroy biodiversity and woodlands, with the proposal to build hundreds of new homes on green field sites and on Green Belt land. The stance that Three Rivers District Council is completely contradictory.	<ul style="list-style-type: none"> Agree with policy approach but disagree with building homes on Green Sites/ Green Belt 	Noted	None
P1_00 048	Yes		No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00 049	Yes		However You do need to update your plan	<ul style="list-style-type: none"> Agree with approach but update the Local Plan 	Noted	None
P1_00 053	Yes		Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 054	Yes		Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 055	No		Developers should not be allowed to remove any existing trees even if they replace with a new one. This is not the way to encourage biodiversity which develops over many years	<ul style="list-style-type: none"> Do not allow developers to remove a tree without replacing it. 	Noted	None
P1_00 056	Yes		WITH RESERVATIONS: Para 10.18 (3) The proposed policy offers protection '...unless it can be demonstrated that...'. I fear that this allows the intent of the policy to be circumvented because it does not present criteria which would constitute 'demonstration'. Also, Para 10.24 should explicitly state which other areas are covered by 'surrounds'. For example, it should include wooded areas bordering the West Herts Golf Club, Jacott's Hill, Harrocks Wood, Copthorne Wood, etc.	<ul style="list-style-type: none"> Agree with approach but policy is too vague and do not offer protection for wildlife and ecology 	Noted	None
P1_00 058	Not Specified		Removing habitat threatens our little remaining wildlife and kills off animals that can't adapt to urban life - that depends on woods and forests.	<ul style="list-style-type: none"> Do not agree with removing habitats 	Noted	None
P1_00 062	Not Specified		I would like to add into the local plan consultation a provision that new homes and extensions in the Three Rivers are built with Swift boxes and that any planning permissions for extensions takes into account the potential disruption for Swifts as existing properties are changed.	<ul style="list-style-type: none"> All developments should have swift boxes particularly areas favoured by swifts (such as Rickmansworth and Mill End) 	Noted	None

P1_00 063	Yes	Agree		• Agree with approach	Noted	None
P1_00 064	Yes	XX		• Agree with approach	Noted	None
P1_00 066	No	Any developments must make additional open space developments outside the development so all in the area can benefit, otherwise only the people in the development will get the use of this		• All developments must provide Green Space contributions	Noted	None
P1_00 068	No	As more than 50 % of the voters opted to Leave the E.U. - even Remainers like myself are no longer bound by European Law while in England so the first paragraph needs changing! Again, the flavour of the section sounds good but has many points where a straight yes/no answer cannot be given without giving someone an opportunity to confound the ideal.		• The first paragraph needs changing as no longer in EU. Feel that policy can be circumvented	Noted	None
P1_00 069	No			• Do not agree with approach but no reason given.	Noted	None
P1_00 071	Yes	In any plan, the policy of biodiversity, trees woodland and landscaping should address and increases biodiversity		• Agree with approach	Noted	None
P1_00 074	Yes			• Agree with approach	Noted	None
P1_00 076	No	This is a nonsense policy. If it can be argues that the need for the development would outweigh the need to safeguard the biodiversity of the site then it sounds like developers could do what they like. There is no protection offered here to the local environment. The areas of protection are so few and the burden of the human impact on these local areas would be so high if other natural areas were destroyed that there would just be a complete erosion of the natural environment. The policy must be much stronger and clearer.		• Policy offers no protection for Biodiversity from development.	Noted	None
P1_00 078	No	Too many let outs for developers e.g. allowing compensation. Stronger measures are required to prevent developers seeking legal let outs.		• Stronger legal protection from developers required.	Noted	None
P1_00 080	Yes	So don't build on it		• Agree with approach	Noted	None
P1_00 083		Point 1 should be made more explicit and clearer in line with NPPF and the Environment Bill Change to: '1) Development should result in a measurable net gain to the biodiversity value of a site by a minimum of 10% in habitat units. The most recent Defra biodiversity metric should be used to measure biodiversity net gain.' Specifying minimum distance to a hedge or woodland is critical in conserving the value of the hedge or woodland and has been employed by East Herts, North Herts and Broxbourne in their local plans for this purpose. If you don't specify distance it will be reduced to the barest margin and affect the functionality of the priority habitat e.g. a hedge with 2 warehouses either side will have little ecological value. Change 9b to: '9b Development proposals on sites which contain existing trees and hedgerows will be expected to retain and buffer with complimentary habitat as many trees and hedgerows as possible, particularly those of local amenity or nature conservation value or hedgerows considered to meet the criteria of the Hedgerow Regulations 1997. Buffers to hedgerows and woodland should be a minimum of 10m and 15m to Ancient Woodland.' Similarly the policy below should be made more effective Change 9d to: '9d Development should be designed in such a way as to allow trees and hedgerows to grow to maturity without causing undue problems of visibility, shading or damage. A minimum buffer of complimentary habitat of 10m will be required to retained trees and hedges. Development likely to result in future requests for significant topping, lopping or felling will be refused.'		• Amend policy to be more clearly in line with NPPF and Environment Bill Change. Also need to specify distances to a hedge or woodland	Noted	None
P1_00 084	Yes	To protect wildlife and habitats		• Agree with approach	Noted	None
P1_00 086	No	I hate to be cynical but i don't believe all the protection, replacement of provision offered will actually happen		• Implementation of this policy will not take place.	Noted	None
P1_00 088	Yes	Sensible		• Agree with approach	Noted	None
P1_00 089	Yes	We must make sure any land that is conservation or protected is not developed, so owners can raise cattle and new trees and wild life can thrive.		• Agree with approach but ensure any land that is under a protected designation is not developed	Noted	None
P1_00 091	Yes	Nature should have protection		• Agree with approach	Noted	None
P1_00 096	Yes	Seems sensible		• Agree with approach	Noted	None
P1_00 097	Yes	Protecting woodlands and landscapes is essential.		• Agree with approach	Noted	None
P1_00 098	No	3b. This is not possible. Any neutral ecologist or academic would tell you this is not feasible. You cannot mitigate, it will not work and will only lead to further destruction. Absolutely not. The existing biodiversity must not be affected AT ALL.		• Point 3b is not feasible and cannot be mitigated against.	Noted	None
P1_00 099	No	I object to 3B: 'Alternative wildlife habitat provision can be made in order to maintain local biodiversity; and Adverse effects can be satisfactorily minimised through mitigation and compensation measures to maintain the level of biodiversity in the area.' it is just not possible to mitigate any ecologist not employed by a developer or any academic knows this. Mitigation must not be an option, these special sites must be protected.		• Point 3b is not feasible and cannot be mitigated against.	Noted	None
P1_00 102	Yes	SSSIs must be protected at all costs and developers must be made to enhance any landscape affected by their developments.		• Agree with approach	Noted	None
P1_00 106	No	Destructing of everything. People move into these family green areas because they like green areas, not because they want it filled with flats.		• Disagree – Will lead to destruction of everything.	Noted	

P1_00 107	Yes	..as long as you don't build on greenbelt land in the first place, and as long as you don't increase urbanisation	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 108	No	Don't destroy the biodiversity we already have. Appreciate what you have already, it would be less costly than reinventing the wheel	<ul style="list-style-type: none"> Do not destroy the biodiversity 	Noted	None
P1_00 110	No	<p>No. Much greater emphasis should be given to the requirement for net biodiversity gain which is likely to be promoted in forthcoming legislation. PPO 21 should reflect the percentage biodiversity net gain figure which is current or proposed for all development (currently 10%).</p> <p>Paras 3b and 3c need to be much more specific as to the exact meaning of 'local biodiversity' and 'level of biodiversity in the area', in terms of species, habitat structure and what is meant spatially by local. Some habitats and species may never recolonise alternative sites and could become extinct in the locality. On many sites their value lies in their longevity and this cannot be reproduced, so that paras 3b and 3c should not be applicable. This applies especially to Sites of Special Scientific Interest.</p> <p>Para 10.30 sets out the hierarchy of delivery locations for biodiversity net gain. A spatial strategy indicating locations throughout the District where biodiversity net gain can be located is essential. This should specify in detail the nature of the habitats required and how they should be established and, critically, maintained in perpetuity. Without this it is probable that least-cost options will be adopted. Partnership with existing landowners will be essential to achieve the desired outcome. Maintenance would be totally impractical if the third option only is achieved (offsetting at a national level) and this would result in the inability to control or match existing conditions and a critical loss of biodiversity locally.</p> <p>Para 10.31 includes unacceptable proposals: development proposals should not cause harmful effects to protected species or habitats, since this will result in the erosion of biodiversity, and mitigation and compensation are often not satisfactory options. This paragraph also conflicts with the provisions of para 10.33.</p> <p>Reference should be made to the current consideration being given to extending the AONB to include more land in Three Rivers and adjoining areas. The Local Plan should include policies and criteria to prevent development in the areas under consideration that would normally be resisted if the site was already in the AONB.</p>	<ul style="list-style-type: none"> Do not agree with approach; More emphasis for biodiversity net gain which should reflect a percentage (currently 10%); Paras 3b and 3c need to be much more specific as to the exact meaning of 'local biodiversity'; A spatial strategy indicating locations in Three Rivers where biodiversity net gain can be located is essential; Para 10.31 includes unacceptable proposals: development should not cause harmful effects to protected species or habitats, will result in erosion of biodiversity. Mitigation and compensation are often not satisfactory options. Conflicts with para 10.33. Reference current consideration with AONB extension and include more land in Three Rivers and adjoining areas.; Local Plan should include policies and criteria to prevent development in the areas under consideration that would normally be resisted if the site was already in the AONB. 	Noted	Biodiversity net gain policy
P1_00 112	Yes	Completely in favour of preserving ancient woodland and wildlife	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 113	No	I think you can do more on tree planting and verges rather than just pushing it all onto developers	<ul style="list-style-type: none"> Need to do more tree planting along verges 	Noted	None
P1_00 114	Yes	Concur	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 116	Yes	I agree with the policy as stated.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 117	Yes	Maintain woodlands	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 119	No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Do not develop anymore land as is a sanctuary for woodland 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00 120	Yes	An essential list that also recognises that where development is necessary it should not be at the expense of irreplaceable natural assets i.e. open spaces in the Green Belt. Refer back to the need for housing and other development that should only include the need of local residents not provision for incomers and e.g. schools to serve communities outside the area.	<ul style="list-style-type: none"> Agree with approach. List also recognise where development is necessary and not at expense of natural assets. 	Noted	None
P1_00 123	Yes	I think it is a good statement of policy and provides a good way forward	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 127	No		<ul style="list-style-type: none"> Do not agree with approach but no comment 	Noted	None
P1_00 128	No	The suggested developments on greenbelt would not protect our local green areas.	<ul style="list-style-type: none"> Developments on Green Belt do not protect local green areas. 	Noted	None
P1_00 130	No	Hhb	<ul style="list-style-type: none"> Do not agree with approach but no comment 	Noted	None
P1_00 131	No	'Protected species under UK or European law' - strike the European law words (more's the pity!). 'where development is necessary it should not be at the expense of irreplaceable natural assets' at odds with Green Belt map redrawing. '7) Linked habitats' - well done. See my previous wildlife corridor comment. Overall, well thought out section.	<ul style="list-style-type: none"> Remove the European Law reference; 'where development is necessary it should not be at the expense of irreplaceable natural assets' is at odds with Green Belt map redrawing. 	Noted	None
P1_00 132	Yes	balanced approach is best	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 133	Not Stated	Ancient Woodland should be captured within the Policy Options – see Q20 comment.	<ul style="list-style-type: none"> Capture Ancient Woodland within the Policy Options 	Noted	None
P1_00 135	No	We agree that development should result in a net gain of biodiversity value, however, there needs to be a specific target set. It is suggested that a 10% biodiversity net gain in line with the	<ul style="list-style-type: none"> Needs to be a specific target, would suggest 10% biodiversity net gain. 	Noted	None

			forthcoming Environment Bill would be suitable. Guidance and access to datasets should be provided and Advertised to applicants regarding the most suitable habitats for each locality. A methodology should be established for determining the most suitable alternative off-site provision. This could be done by referencing the Herts Ecological Network Map or a future Local Nature Recovery Strategy (which counties will be required to produce under the new Environment Bill).			
P1_00 137	Yes	Yes I agree with all the above		• Agree with approach	Noted	None
P1_00 140	Yes	Important points. This should ideally extend to all other areas of Hertfordshire.		• Agree with approach	Noted	None
P1_00 142	No	.		• Do not agree with approach	Noted	None
P1_00 144	Yes	It's good		• Agree with approach	Noted	None
P1_00 145	Not Specified	I agree with it in principle but again key aspects have been missed: Section 10.3 Important sites have been missed: Maple Lodge Nature Reserve Maple Lodge Marsh Wetland Centre This policy should be much higher up the list (number 2!) so that its importance is recognised What is missing from this policy is the following statement: 2) All major developments are required to submit a BIODIVERSITY Statement demonstrating how they are going to mitigate to protect the habitats that they will be destroying and hence maintaining your policy aim of protecting biodiversity I do not agree with Section 10.30 giving developers the following cope out clause 'offsetting approach can be used whereby any monies secured can buy into projects at the national level.' as this will not protect the local wildlife and will undoubtedly result in a net loss of biodiversity. Who will measure this? I do not believe anyone will monitor this to make sure it happens. All that will be seen is the continuous erosion of our wildlife by those of us (volunteers) who conduct the surveys. I only agree with on-site mitigation. Although you mention Biodiversity in your site assessments you only express a concern when it is part of, or next to a recognised wildlife site. To meet your objective of protecting biodiversity, (quote from your Climate Change and Sustainability Document Strategy 'Aim: To ensure net gains in biodiversity to address the ongoing Ecological Emergency, protect and enhance precious habitats and species, and utilise nature to build climate resilience) a full biodiversity assessment of each site should be performed by a trained ecologist. If building on green belt land, then areas to mitigate the damage to biodiversity need to be identified and protected to compensate for the loss.	<ul style="list-style-type: none"> • Maple Lodge Nature Reserve and Wetland Centre should be much higher on the list; • All major developments need to submit a biodiversity statement; • Do not agree with Section 10.30 giving developers the following clause 'offsetting approach can be used whereby any monies secured can buy into projects at the national level'; • Only agree with on-site mitigation; • Full biodiversity assessment of each site should be performed by a trained ecologist; 	Noted	None	
P1_00 146	No	More emphasis should be placed on real biodiversity, not on trying to cover the area in warehouses		<ul style="list-style-type: none"> • More emphasis on real biodiversity, not covering areas in warehouses. 	Noted	None
P1_00 147	No			• Do not agree with approach	Noted	None
P1_00 148	Yes	Green areas play an important part in the areas aminty levels, particularly trees.		• Agree with approach	Noted	None
P1_00 151	Yes	Because it seeks to protect biodiversity from the pressures of development.		• Agree with approach	Noted	None
P1_00 155	Yes	We should consider any living thing be it animal, plant, and bird, insect or aquatic as having just as much right to life as us, we must stop thinking of it as our land in the context of belonging to humans. It doesn't belong to just the human species, it belongs to all living things and we must treat it with the respect it deserves and consideration of human impact on the non-human should always be considered.		• Agree with approach but should treat wildlife with more respect.	Noted	None
P1_00 162	Yes	This is a sensible approach		• Agree with approach	Noted	None
P1_00 163	Yes	It is vital to protect these areas for the sake of both wildlife and people.		• Agree with approach	Noted	None
P1_00 166	Yes	However, I do not believe building on our neighbouring wildlife's homes is acceptable or helpful		• Agree with approach	Noted	None
P1_00 167	Not Stated	Why is the Colne Valley Park not included on this list? xx. Clause 11.18/page 80. Unless the Council lays out what is required in detail, the district will be open to abuse by developers. The words 'strongly encouraged' will be music to the ears of profiteering developers. The residents frankly deserve better than this. TRDC needs to expend the energy to lay out a strong requirement – both in terms of aesthetics and quality requirements.		• Words 'strongly encouraged' will not encourage developers.	Noted	None
P1_00 170	No	f) Where the felling of a tree is permitted, a replacement tree of an appropriate species, size and in a suitable location will be required, taking account of issues such as landscape and biodiversity. Felling a mature tree and simply moving another into a similar location is not Carbon Neutral As there is still 1 tree felled. Better to move the existing tree not fell it, or plant more new trees and monitor their development to ensure that they grow and penalise if necessary.		• If removing a mature tree and replacing it with a new tree is not carbon neutral. Either replace with numerous trees or move existing tree	Noted	None
P1_00 174	Yes	Yes generally agree, although some important points: 3b and 3c assume that habitats and species can recolonise alternative sites, but this is often not the case and would mean certain species and habitats could become locally extinct should their current habitat be removed, altered or degraded by development. Many biodiverse sites are rich in wildlife because they have longevity and have not been disturbed, allowing wildlife populations to settle there. This longevity cannot be reproduced easily or within the timeframes necessary to prevent local extinctions. 5 – The biodiversity net-gain		<ul style="list-style-type: none"> • 3b and 3c assume that habitats and species can recolonise alternative sites, not often the case; • Biodiversity net-gain policy will be relevant to ALL development; 	<ul style="list-style-type: none"> • At present, the Environment Bill has not been enacted into law; therefore TRDC cannot enforce the provisions of the Bill. 	None

			<p>policy will be relevant to ALL development, no matter if it is on a designated or important site. The Local Plan should clarify this. 6 - There is no mention of measurable 10% biodiversity net gain as a legal requirement under the Environment Bill even though the Environment Bill is progressing through Parliament rapidly and is due to gain royal assent by Autumn 2021. Why is this not referenced? 7- Given the importance of avoiding habitat fragmentation, can it be specified that new developments utilise permeable boundaries whether through natural hedging or fencing that has a gap to enable wildlife such as hedgehogs to traverse through gardens so that they can find food, mates, and shelter. 8- This is good but can the Local Plan quantify what perpetuity actually means for a developer e.g. Specify a minimum 30 year obligation on the developer to maintain biodiversity net-gain sites (as will be required by the Environment Bill). 9. f. - As with biodiversity, this should oblige the developer to maintain any replacement sapling through to maturity so that the lost mature tree/hedge is truly compensated for. The Environment Bill will require management of biodiversity net gain habitats, including trees planted, for a minimum period of 30 years. Given the failure rate of tree saplings, it's important to ensure whatever trees planted actually reach maturity, otherwise the lost tree is never truly replaced. Long term management of habitats and biodiversity features is vital to secure their intended benefits and monitoring schemes will be necessary to ensure these obligations are being met. How will the Council ensure these obligations are met? Can this be detailed in the Local Plan for the avoidance of doubt, and to send a strong message to developers? Are there any plans for carbon offsetting to be required for mature trees removed? It is not just the ecological value that is lost when</p> <p>A tree is removed, but also the carbon sequestration value. 10.30 - Can this specify a 10% net gain in line with the Environment Bill, rather than just an unspecified net gain? Developers should be provided with guidance on how to incorporate specific measures such as bat and swift boxes into buildings, gaps in fencing for wildlife, sensitive lighting schemes etc.. 10.35 - The wording of this seems quite weak e.g. "where required" "may be" and would be easily ignored by developers. Can it be strengthened to say: Developers WILL be required to contribute to improvements in biodiversity as part of their proposals, in accordance with the Environment Bill.- Currently it's anticipated the Bill will receive Royal Assent in Autumn 2021 and the new rules will become a legal requirement in 2023.</p>	<ul style="list-style-type: none"> No mention of 10% biodiversity net gain as a legal requirement under the Environment Bill; Specify a minimum 30 year obligation on the developer to maintain biodiversity net-gain sites; wording of this seems quite weak e.g. "where required" "may be" and would be easily ignored by developers. Can it be strengthened to say: Developers WILL be required to contribute to improvements in biodiversity as part of their proposals, in accordance with the Environment Bill 		
P1_00 181	Not Specified	<p>It should be clarified in section 3 that a, b and c will all have to be demonstrated for a development to be permitted.</p> <p>The biodiversity section needs to make more reference to Biodiversity Net Gain. It should set a target percentage increase, which, in our view, should be 20% in a sensitive area such as the Chilterns. Reference also needs to be made as to how this would be measured e.g. Biodiversity Metric 3.0, recently published by DEFRA. There need to be long term Management Plans put in place to ensure new habitats and species remain in the long term (at least 30 years).</p> <p>There should also be a specific reference to addressing the biodiversity crisis and to contributing to a strategic approach to nature recovery across the District.</p> <p>Generally, there needs to be a more visionary approach to biodiversity and a step change in habitat creation and management.</p> <p>The trees section needs to refer to the role of tree planting in nature recovery and in addressing climate change.</p>	<ul style="list-style-type: none"> Clarify in section 3 that a, b and c will all have to be demonstrated for a development to be permitted; Needs to make more reference to Biodiversity Net Gain; Reference how this would be measured e.g. Biodiversity Metric 3.0; Needs to be a more visionary approach to biodiversity and a step change in habitat creation and management. Trees section needs to refer to role of tree planting in nature recovery and in addressing climate change. 	Noted	None	
P1_00 183	Yes	As above	<ul style="list-style-type: none"> Agree with approach 	Noted	None	
P1_00 184	No	<p>The suggestion that "the need for the development would outweigh the need to safeguard the site" is vague and easily open to abuse.</p> <p>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.</p> <p>Adequate protection requires that sites designated as important are not disturbed. Years/decades of ecological development cannot simply be moved or replaced.</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> "the need for the development would outweigh the need to safeguard the site" is vague and open to abuse; Minimising adverse effects" is not protection; Focus on "species identified for retention" shows misunderstanding of ecology; The plan should state categorically that development will not be permitted in the listed areas under the Local Plan; (3(b)) suggest provision of alternative sites should require a full EIA. 	Noted	None	
P1_00 186	No	This development will have a significant negative impact on the environment	<ul style="list-style-type: none"> Will have a negative impact on the environment 	Noted	None	
P1_00 187	No	<p>The suggestion that "the need for the development would outweigh the need to safeguard the site" is vague and easily open to abuse.</p> <p>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.</p> <p>Adequate protection requires that sites designated as important are not disturbed. Years/decades of ecological development cannot simply be moved or replaced.</p> <p>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.</p> <p>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>	<ul style="list-style-type: none"> "the need for the development would outweigh the need to safeguard the site" is vague and open to abuse; Minimising adverse effects" is not protection; Focus on "species identified for retention" shows misunderstanding of ecology; The plan should state categorically that development will not be permitted in the listed areas under the Local Plan; 	Noted	None	

			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.	<ul style="list-style-type: none"> (3(b)) suggest provision of alternative sites should require a full EIA. 		
P1_00_190	Yes	Sensible if sensitively applied		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00_191	Yes	I note the inclusion of Whippendell Woods & environs. Surely therefore this precludes further development to the north of little green lane?		<ul style="list-style-type: none"> Note the inclusion of Whippendell Woods, must therefore prevent further development north of Little Green Lane? 	Noted	None
P1_00_201	Yes	More biodiversity is a good thing		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00_206	No	New developments are all about DPH and no consideration is made to INCREASING trees/woodland in these areas? Why not?		<ul style="list-style-type: none"> No consideration to increasing woodland and trees 	Noted	
P1_00_209	No	The proposed plans are the antithesis of protection		<ul style="list-style-type: none"> Plan does not protect the environment 	Noted	
P1_00_211	No	I agree that development should result in a net gain of biodiversity value, however, there needs to be a specific target set. A 10% biodiversity net gain in line with the forthcoming Environment Bill would be suitable. Guidance and access to datasets should be provided and advertised to applicants regarding the most suitable habitats for each locality. Designers should be provided with guidance on how to incorporate specific measures such as bat and swift boxes and bricks into buildings. There should be a recognition of tree and hedgerow lines that maintain connectivity between habitats. Lines should always be maintained where possible. There is an issue with applicants/developers removing vegetation prior to planning approval. It is suggested that where felling has happened in the recent past, prior to application, the applicant will be expected to replace trees and hedges lost.		<ul style="list-style-type: none"> Should be a target for 10% net biodiversity, in line with Environment Bill; Need guidance on incorporating swift and boxes into developments; Recognition of trees and hedgerow lines that maintain connectivity between habitats and applicant replace any felling that has taken place before. 	Noted	None
P1_00_215	Yes	I would say encourage tree planting - but if you keep building houses there will be no land to plant on.		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00_218	Yes	Completely support this policy that habitats are not fragmented and devalued. However with the scale of development proposed, there will inevitably be a reduction in biodiverse habitats, therefore guidance should be provided to improve the biodiversity of known habitats and green spaces. It should be expected that developers seek to implement a net biodiversity gain on adjacent land.		<ul style="list-style-type: none"> Scale of development proposed will inevitably reduce biodiverse habitats; need guidance to get developers to improve net biodiversity gain. 	Noted	None
P1_00_219	No	There should be no exceptions (Point 3)		<ul style="list-style-type: none"> Should be no exceptions 	Noted	None
P1_00_222	No	We agree that development should result in a net gain of biodiversity value, however, there needs to be a specific target set. It is suggested that a 10% biodiversity net gain in line with the forthcoming Environment Bill would be suitable. Guidance and access to datasets should be provided and advertised to applicants regarding the most suitable habitats for each locality. A methodology should be established for determining the most suitable alternative off-site provision. This could be done by referencing the Herts Ecological Network Map or a future Local Nature Recovery Strategy (which counties will be required to produce under the new Environment Bill). Designers should be provided with guidance on how to incorporate specific measures such as bat and swift boxes and bricks into buildings. There should be a recognition of tree and hedgerow lines that maintain connectivity between habitats. Lines should always be maintained where possible. There is an issue with applicants/developers removing vegetation prior to planning approval. It is suggested that where felling has happened in the recent past, prior to application, the applicant will be expected to replace trees and hedges lost.		<ul style="list-style-type: none"> Needs to be a 10% target set in line with forthcoming Environment Bill; Methodology should be established for determining the most suitable alternative off-site provision; Need design guidance on incorporating specific measures such as bat and swift boxes and bricks into buildings. Issue with applicants/developers removing vegetation prior to planning approval. Suggest where felling has happened in recent past, applicant expected to replace trees and hedges lost. 	Noted	None
P1_00_223	No	There should be NO development on Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites or protected species sites or identified as being in need of conservation. Otherwise what is the point of designating them so!		<ul style="list-style-type: none"> No development on SSSI, Local Nature Reserves or sites identified in need of conservation. 	Noted	None
P1_00_224	Yes	as long as it is acted upon and followed through... and altered when it needs to be upgraded		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00_226	Yes	This is particularly important as we have to take climate change seriously. Landscaping and the provision of trees and green areas is very important both for environment and wellbeing. However, has to be a focus on reduction of use of cars and encouragement of other modes of transport. It is increasingly evident that green verges and green spaces as well as pavements are used as parking spaces for cars so planning has to balance this and things put in place to prevent this.		<ul style="list-style-type: none"> Agree with approach; Has to be a focus on reduction of car use and other modes of transport; Green Verges and green spaces are used as parking spaces so planning has to balance this. 	Noted	None
P1_00_227	No	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 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. Where alternative wildlife habitat provision can be made in order to maintain local biodiversity; (3(b)) provision of alternative sites should require a full EIA.		<ul style="list-style-type: none"> The need for the development would outweigh the need to safeguard the site" is vague and open to abuse; Minimising adverse effects" is not protection; Focus on "species identified for retention" shows misunderstanding of ecology; The plan should state categorically that development will not be permitted in the listed areas under the Local Plan; (3(b)) suggest provision of alternative sites should require a full EIA. 	Noted	None

P1_00 230	Not Stated	<p>1. I understand that the Council is currently conducting a Biodiversity Audit and preparing a Tree strategy. These need to be factored into the Local Plan to ensure that critical habitats and trees are not being lost to development.</p> <p>2. The protection of sites such as meadow habitats needs to be directly stated and included in appropriate policies. The UK has lost 97% of its wildflower meadows since the 1930s. The Council needs to do more to protect these vital and valuable habitats and put measures in place to prevent any more loss. More protection needs to be given to all meadow habitats, pasture, green fields and previously undeveloped sites at the earliest stage of the process. These sites should be evaluated by Local Wildlife Trusts at the beginning of the Local Plan process and screened out of the consultation process as appropriate. Meadow habitats should not be getting through to the proposed sites stage.</p> <p>3. There should be a stipulation that developer biodiversity audits must be conducted at the appropriate time of year for the species being recorded. There should also be a requirement for the Local Wildlife Trust to conduct a biodiversity audit at the appropriate time of year. These audits need to be considered together.</p> <p>4. The potential impact of development on all species which inhabit or use a site for resources over the wider area should be comprehensively and independently evaluated.</p> <p>5. Not enough is being done to prevent the fragmentation of habitats and protection of wildlife corridors. A site cannot be considered on its own but must be evaluated as part of the wider network which covers the whole area so that species are able to move freely and safely. The Council should work with neighbouring authorities regarding the protecting of wildlife corridors which cover wide tracts of land.</p> <p>6. Moving species is unacceptable. It is impractical and for some species, just does not work. The protection of species habitats needs to be a priority.</p> <p>7. Compensation for the destruction of habitats is unacceptable and inadequate as each habitat is unique and can be well established over a long time. It is impossible to recreate a habitat such as a meadow which has historically been a meadow. Ancient / Veteran trees and hedgerows simply cannot be replaced. Once lost, they are lost forever. There is no justification for this and nothing will compensate for their loss.</p> <p>8. The potential impact of development on habitats, flora and wildlife needs to be evaluated. This information needs to be made publicly available for accountability purposes as residents should know exactly what is being lost to development.</p> <p>9. Need to ensure that hedgerows are protected and not lost to development.</p> <p>10. The history of previously undeveloped sites needs to be investigated and considered.</p> <p>11. The importance of previously undeveloped sites in terms of climate capture to help with the Climate Emergency needs to be considered.</p> <p>12. To increase biodiversity, the Council needs to work with Herts County Council, Parish Councils and housing associations and other landowners on the management of verges and determining spaces appropriate for rewilding. Rewilding should be added to the Policy.</p>	<ul style="list-style-type: none"> Biodiversity and Tree Strategy needs to be factored into the plan; Protection of sites such as meadow habitats needs to be directly stated; Developer biodiversity audits must be conducted at the appropriate time of year for the species being recorded; Potential development impact on all species which inhabit or use a site for resources should be comprehensively and independently evaluated; Not enough done to prevent fragmentation of habitats and wildlife corridors; Moving species does not work; Compensation for habitat destruction is unacceptable and inadequate as each habitat is unique and can be well established over a long time; Potential impact of development on habitats, flora and wildlife needs to be evaluated. 	Noted	
P1_00 233	No	I do not think the preferred policy for Biodiversity, Trees, Woodlands and Landscaping is the right approach. If an area/site have proven to show biodiversity, in up keeping our commitment to reducing the impact of climate change and upholding green and blue infrastructure, as well as safe guarding greenbelt, these spaces should be protected against development.	<ul style="list-style-type: none"> If area has been proven to have biodiversity on site, should not develop it. 	Noted	None
P1_00 234	Yes	I do not think the preferred policy for Biodiversity, Trees, Woodlands and Landscaping is the right approach. If an area/site have proven to show biodiversity, in up keeping our commitment to reducing the impact of climate change and upholding green and blue infrastructure, as well as safe guarding greenbelt, these spaces should be protected against development.	<ul style="list-style-type: none"> If area has been proven to have biodiversity on site, should not develop it. 	Noted	None
P1_00 236	Yes	Stipulations make sense	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 240	Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 244	Yes	Such protections are vital.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 250	Yes	Local Plan Regulation 18 (Part 1) Preferred Policy Options Consultation June 2021 These representations are submitted by Iwan Jones, Managing Director of JIG Planning & Development Ltd, on behalf of the landowner of the land to the north of Chalfont Lane, Maple Cross Identified as site EOS12.3 within Part 2 of the Local Plan Regulation 18 Sites for Potential Allocation. Yes, because the Councils overall aim is to ensure that development results in a net gain of biodiversity value. National policy states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF requires local authorities to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, and promote the conservation, restoration and enhancement of priority habitats. Biodiversity is an integral part of the character of Three Rivers and contributes to the high quality of life in the area. Conserving and enhancing the diversity of wildlife and habitats in Three Rivers is a strategic objective. We fully support this.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 253	Not Stated	PPO 21 requires development to result in a biodiversity net gain. Part 9 of the policy text states that proposals for new development should be submitted with landscape proposals which seek to retain trees and other important landscape and nature conservation features. Whilst this objective is noted, we believe policy text should recognise that not all trees are of equal value, both in terms of	<ul style="list-style-type: none"> PPO21 requires development that results in net gain; Trees are graded and therefore policy text should recognise that existing 	Noted	None

			biodiversity and amenity. A net gain, plus other benefits in terms of landscaping improvements can often be achieved where existing self-seeded or poor-quality trees are replaced with trees of an equal or higher value. This may be necessary to facilitate the beneficial development of a site. Trees are graded and therefore policy text should recognise that existing trees and other features should be judged in terms of their value, so that removal of poor-quality specimens with appropriate replacement is supported.	trees and other features should be judged in terms of their value, so that removal of poor-quality specimens with appropriate replacement is supported.		
P1_00 256	Yes	Yes	Seems reasonable	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 262	Yes	Yes	Fine	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 264	Not Stated	Not Stated	<p>8) How is the biodiversity gain in perpetuity measured? Defra Biodiversity Metric 3? This must be identified.</p> <p>We believe it is essential that an independent valuation is conducted by an impartial body not through the developers choice as it risks the under estimating of the value of the existing wildlife on a site and exaggerates promises of net gain.</p> <p>How can net gain schemes delivered on-site be properly monitored or enforced due to TRDC's funding constraints?</p> <p>Independent scientists have examined plans of net biodiversity gain and have detected many flaws, including for example that the metric will cause biodiversity net loss of invertebrates since valuable invert habitats are rated 'low'. Thus the government's new environment policy for net gain needs to be strengthened by policies made by local government. E.g. some plans rely partly on allocating biodiversity value to gardens of its housing developments but developers cannot guarantee what happens in the future, e.g. paving, artificial lawns or outbuildings. Pockets of land and green corridor type strips will be surrounded by hundreds of new residents and their cats and dogs meaning wildlife could struggle to survive, similarly children's playgrounds cannot be included within the biodiversity 'gain' nor strips of land with cycle paths running through them.</p> <p>What protection can TRDC offer to the red and amber listed species since there, like any other wildlife, cannot necessarily be moved onto a new site thereby causing its further decline. What further measures can be taken? What happens when land is and always has been used by migratory birds - or do they not count?</p>	<ul style="list-style-type: none"> Need to set out how Biodiversity Metric 3 is identified; An independent valuation should be conducted by an impartial body not through the developers choice as it risks the under estimating of the value of the existing wildlife on a site; Many flaws in biodiversity net gain; What protection can TRDC offer to the red and amber listed species since there, like any other wildlife, cannot necessarily be moved onto a new site thereby causing its further decline. 	Noted	BNG Policy
P1_00 266	Not Stated	Not Stated	<p>Yet again mighty fine words but lack measurables.</p> <p>3a). Must be removed from this plan it will be every developers sole focus to prove the need outweighs the need to safeguard the biodiversity of the site. We need Nature Recovery to be given priority not just something that can be brushed aside by developments.</p> <p>Without measurables how can the biodiversity gain in perpetuity measured? Defra Biodiversity Metric 3? This must be identified. How will net gain be enforced? Once plans have been accepted and the developer deviates from them post development - how will this be pinned down?</p> <p>Independent scientists have examined the DEFRA Biodiversity Metric 3 and have detected many flaws. Thus the government's new environment policy for net gain needs to be strengthened by local government. E.g. some plans rely partly on allocating biodiversity value to gardens of its housing developments but developers cannot guarantee what happens in the future, e.g. paving, artificial lawns or outbuildings. Pockets of land and green corridor type strips will be surrounded by hundreds of new residents and their cats and dogs meaning wildlife could struggle to survive, similarly children's playgrounds cannot be included within the biodiversity 'gain' nor strips of land with cycle paths running through them.</p> <p>What happens to the red and amber listed species since they, like any other wildlife, cannot necessarily be moved onto a new site resulting in its further decline. What further measures can be taken? What happens when land is and always has been used by migratory birds - or do they not count because they are not local!</p>	<ul style="list-style-type: none"> 3a) Remove from the plan, be every developers sole focus to prove need outweighs the need to safeguard the biodiversity of the site. Need to set out how Biodiversity Metric 3 is identified; An independent valuation should be conducted by an impartial body not through the developers choice as it risks the under estimating of the value of the existing wildlife on a site; Many flaws in biodiversity net gain; What protection can TRDC offer to the red and amber listed species since there, like any other wildlife, cannot necessarily be moved onto a new site thereby causing its further decline. 	Noted	BNG Policy
P1_00 268	No	No	<p>I am very happy to see that Three Rivers is targeting a gain in biodiversity, but this will not be achieved with the current proposal as it is worded. Having any policy worded as "The need for the development would outweigh the need to safeguard the biodiversity of the site;" will simply offer nothing more than a vague comfort to residents that biodiversity within the District will be protected. Let us not forget the importance of Biodiversity being quoted in this Local Plan - if the Council really believes that to be the case, then biodiversity should be protected without exception. Please ensure that the relevant current biodiversity metric is used to calculate gain, which would be DEFRA Biodiversity Metric 2.0 (until such time as replaced by 3.0). I do not consider it acceptable to suggest that biodiversity gain can be achieved by offset somewhere else in the district (where not deemed achievable in the site under development) and even worse so that this could potentially be offset nationally - this simply does not protect the biodiversity in Croxley Green or elsewhere in Three Rivers. Rather than saying "seek" to retain existing trees etc, I would like to see landscaping of new developments be led by those with appropriate and independent expertise to ensure use of suitable diverse species for each location. Any areas which are considered by Three Rivers should be specifically listed as such, including use of maps and highlighted boundaries. Statements such as Whipendell Woods and surrounds are too vague. If there are specific key biodiversity sites, they should be included in the list of protected sites.</p>	<ul style="list-style-type: none"> Policy needs to be strengthened; Ensure assessed against most relevant matrix; Do not consider it acceptable to suggest that biodiversity gain can be achieved by offset somewhere else in the district (where not deemed achievable in the site under development); landscaping of new developments be led by those with appropriate and independent expertise 	Noted	Noted
P1_00 271	Yes	Yes	Seems sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00 276	No	No	In spite of legal requirements, biodiversity is sadly lacking in this draft LP. There is very little explanation as to how biodiversity net gain is going to be achieved and no detailed policies for this very important area.	<ul style="list-style-type: none"> No explanation of how biodiversity net gain will be achieved. 	Noted	BNG Policy

P1_00 277	Not stated	In regards to your policy surrounding biodiversity - we are in full support of the policy that you have put together but we would suggest that buffers are included into Policy Option 21. Not only would this protect woodland, priority habitat, mature hedgerows, wildlife sites but an agreed buffer to be incorporated around all of these will act as urgently needed wildlife/biodiversity corridors and would help to result in a net gain which is needed in line with the NPPF and new environment bill. We would ask therefore that a minimum of a 12m buffer is included around woodlands, priority habitat, mature hedgerows and wildlife sites in line with other LPA's in Hertfordshire. This is an example of the wording of another Herts LPA policy: Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows. It may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees. It is important to include priority habitat, woodlands and hedgerows within the policy as not all priority habitat sites and wildlife sites have been identified/recorded within Hertfordshire and it is imperative that we protect our biodiversity, particularly as developments by all authorities is resulting in the green space/countryside between our urban areas to be drastically reduced.	<ul style="list-style-type: none"> • Include Buffers are included in Policy 21; • Minimum of a 12m buffer is included around woodlands, priority habitat, mature hedgerows and wildlife sites in line with other LPA's in Hertfordshire. • Use example wording from another LPA 	Noted.	None
P1_00 282	No	See above.	<ul style="list-style-type: none"> • Do not agree with approach 	Noted	None
P1_00 283	Not Stated	So, on the first on these criteria, we feel that Policy Option 21 is quite strong. There is a clear commitment to retention of trees and other planting as part of development in 9a and 9b on page 69. 9d is also very welcome, as we are currently seeing a large increase in councils receiving subsidence claims from insurers, where trees are alleged to be the source of subsidence and consequent damage to property; trying to prevent these problems occurring in the future through strong planning policies seems a good way forward. We are also pleased to see that ancient woodland and ancient or veteran trees are given strong protection in para 9e, which appears to be consistent with the strong protection for these habitats provided in para 175c of the National Planning Policy Framework (NPPF). Care needs to be taken with interpretation of the second part of the sentence: "...unless conditions etc..." , as we believe it is important that such conditions should include adequate buffering areas (usually of more than 50 meters) around ancient woods and an appropriate exclusion zone around the base of an ancient tree. We would oppose para 9f on the grounds that it does not go far enough in ensuring adequate tree replacement. Yes replacement trees should be of appropriate species but we believe that there should be more than one tree planted for every mature tree that is removed and the replacement planting should be done as close to the original site as possible. We favor more than one tree being planted for two reasons: firstly because a small sapling will take many decades to reach the same size as a mature tree and hence to provide the same benefits and secondly because we are aware that in urban locations it is not uncommon for new trees to die before reaching maturity. Some councils have a formula in their local plan to calculate how many replacement trees are needed based upon the diameter of the trunk of the tree that is being removed (e.g. Peterborough Local Plan: 2018). But our main concern about Policy Option 21 is that it does not appear to make any strong commitment to ensuring that a significant number of new trees are planted as part of new development, and in particular housing. In the Woodland Trust's Emergency Tree Plan, published in 2020, we set out how trees and woods can contribute to tackling both the climate and biodiversity emergencies and we advocate planting sufficient new trees or woodland (either onsite or nearby) to eventually achieve 30% tree canopy cover. https://www.woodlandtrust.org.uk/media/47692/emergency-tree-plan.pdf Wycombe Council set out such an ambitious target in its local plan about two years ago and Bedford and Central Bedfordshire Councils have also adopted this target for land within the Marston Vale Community Forest. We believe that tree canopy cover targets are the best way of ensuring that everyone in a new development gets benefit from good tree and woodland cover and we think that 30% is an ambitious target but one that should be achievable. Tree canopy cover is a better measure than woodland area or number of trees, as it takes account of all types of trees, in streets, parks, in housing areas and in woodland etc. Our report on Residential Development and Trees sets out a number of benefits of trees and woods in new development https://www.woodlandtrust.org.uk/media/1688/residential-developments-and-trees.pdf and these include economic benefits, for example higher house prices and reduced costs for grass cutting etc: this point is particularly relevant to para 9g, as our report shows that woodland is usually much cheaper to manage than short mown grass. We also have another report Space for People, which sets out our Access to Woodland Standard, which is another way of ensuring that people have easy access to woodland in their locality. https://www.woodlandtrust.org.uk/media/1721/space-for-people-woodland-access.pdf	<ul style="list-style-type: none"> • Care needs to be taken with interpretation of the second part of the sentence: "...unless conditions etc..." , as we believe it is important that such conditions should include adequate buffering areas (usually of more than 50 meters); • Oppose para 9f on the grounds that it does not go far enough in ensuring adequate tree replacement; • Should be more than one tree planted for a mature tree lost, use an example from Peterborough Local Plan; • Main concern about Policy Option 21 is that it does not appear to make any strong commitment to ensuring that a significant number of new trees are planted as part of new development, and in particular housing. 	Noted	
P1_00 297	Not stated	In regards to policy option 21; we are in full support of this policy but would ask that 12m complimentary habitat buffers are included into the policy I regards to woodland, mature hedgerows, wildlife sites and priority habitat. There are numerous sites in Hertfordshire that are of huge importance to both protected species and biodiversity that have not been identified and these	<ul style="list-style-type: none"> • Have a 12m buffer around wildlife habitats 	Noted	None

			areas need protection from development. Incorporating a 12m buffer in these areas will also help sites to result in a net gain regarding biodiversity.			
P1_00_301	Not Stated		The Chilterns Conservation Board strongly supports PPO21 on Biodiversity, Trees, Woodlands and Landscaping. The policy might be enhanced by making explicit reference to: • The particular need to pay special attention to conservation and enhancement of habitats etc in the Chilterns AONB and its setting; • The importance of locally distinctive species in new planting/landscaping, especially in the Chilterns AONB and its setting; • The particular biodiversity potential of the area's chalk streams and the canal (including their potential as wildlife corridors); and/or • Advice on landscaping and planting that is included in the Chilterns Buildings Design Guide.	• Agree with approach, policy can be enhanced via a number of suggestions.	Noted	None
Q22. Should we have considered alternative options?						
P1_00_023			Extend Colne Valley park to all of Mid-Colne Valley as identified in Hertfordshire Biodiversity Action Plan.	• Extend Colne Valley to all of Mid-Colne Valley.	Noted	None
P1_00_026	Yes		Risk of subsidence and settlement to buildings by presence of trees or their removal	• Risk of subsidence and settlements with removal of trees	Noted	None
P1_00_045			Stronger mention could usefully be made of wetlands and links made to the light pollution provisions elsewhere in this plan.	• Make stronger reference to wetlands and links to light provision.	Noted	None
P1_00_049	Yes		Updated each year in line with climate change developments	• Update each year in line with climate change requirement	Noted	None
P1_00_055g	Yes		No development in these areas	• No development in these areas.	Noted	None
P1_00_066	Yes		See above	• All developments must provide Green Space contributions		None
P1_00_068	Yes		I quote - "Development should be designed in such a way as to allow trees and hedgerows to grow to maturity without causing undue problems of visibility, shading or damage. Development likely to result in future requests for significant topping, lopping or felling will be refused." How then do you explain the astounding amount of vandalism visited upon the mature trees and hedgerows that used to grow around the Free Reach School? Much of it totally unnecessary as the proposed roundabout was not undertaken - because of a total lack of understanding of the complex pipework under the A412 serving the nearby water pumping station. The kind of thing that SHOULD have been in a Local Plan!	• Lots of vandalism of mature trees and hedgerows at the free school. • This should have been in the local plan	Noted	None
P1_00_076	Yes		Changing housing policy so it helps young families and people wanting to buy homes rather than just building more on our green spaces.	• Change housing policy so it helps young families and people wanting to buy homes rather than just building	Noted	None
P1_00_078	Yes		Protective legislation.	• Need protective legislation	Noted	None
P1_00_083			See amendments above.	• Amend policy to be more clearly in line with NPPF and Environment Bill Change. Also need to specify distances to a hedge or woodland	Noted	BNG Policy
P1_00_098	Yes		Read above.	• Point 3b is not feasible and cannot be mitigated against.	Noted	None
P1_00_099	Yes		it is just not possible to mitigate- any ecologist not employed by a developer or any academic knows this. Mitigation must not be an option, these special sites must be protected. Protect our special wildlife areas,	• Cannot mitigate, protect special wildlife areas	Noted	None
P1_00_106	Yes		Yes, just forget about it and stop ruining the area.	• Stop ruining the area	Noted	None
P1_00_113	Yes		more active land use	• More active land uses	Noted	None
P1_00_114	Yes		more active land use	• More active land uses	Noted	None
P1_00_119	Yes		This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	• Land is sanctuary for wildlife	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00_128	Yes		Consider alternative sites.	• Consider alternative sites	Noted	None
P1_00_132	Yes		collaborate with neighbouring councils	• Collaborate with neighbouring authorities	Noted	None
P1_00_135_	Yes		Designers should be provided with guidance on how to incorporate specific measures such as bat and swift boxes and bricks into buildings. There should be a recognition of tree and hedgerow lines that maintain connectivity between habitats. Lines should always be maintained where possible. There is an issue with applicants/developers removing vegetation prior to planning approval. It is	• Provide designers with guidance on incorporating specific measures such as bat and swift boxes into building;	Noted	None

			suggested that where felling has happened in the recent past, prior to application, the applicant will be expected to replace trees and hedges lost.	<ul style="list-style-type: none"> Where felling has happened in the past, applicant will be expected to replace trees lost. 		
P1_00 142	Yes	.		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 144	Yes	Stop re-designating using and using green belt land		<ul style="list-style-type: none"> Do not develop Green Belt Land 		None
P1_00 146	Yes	To force developers to use existing brown field sites before allocating green belt to development. Without this there cannot be a nett gain in biodiversity		<ul style="list-style-type: none"> Force developers to use existing brownfield sites before allocating Green Belt 	Noted	None
P1_00 163	Yes	To permit development only where absolutely essential, in view of the importance of protecting biodiversity and woodland.		<ul style="list-style-type: none"> Development only where absolutely essential, in view of the importance of protecting biodiversity and woodland. 	Noted	
P1_00 170	Yes	Contractors who dig up the roads and pavements should be forced to maintain the trees whose roots they cut. Whitelands Avenue has lost several trees due to gas main replacement. Veteran trees which are approaching their end of life and thus represent a potential danger to the public should not be afforded protection at all costs, as their growth rate and hence carbon absorption is not a high as a new healthy tree planted in its place. There is no mention of Carpenters Wood in this plan, yet this is a significant area of woodland adjacent to Chorleywood. Even if this is because it is in Bucks, its development would have to be connected to Chorleywood in terms of its access and facilities. This Plan should state that no development of Carpenters Wood will be permitted from the TRDC / Chorleywood side. Where there are similar woods at the edge the TRDC district this principle should also apply to them.		<ul style="list-style-type: none"> Contractors who dig up roads and trees should maintain trees of roots they cut; no mention of Carpenters Wood, yet this is a significant area of woodland; Plan should state that no development of Carpenters Wood will be permitted from the TRDC / Chorleywood side. 	Noted	None
P1_00 174	Yes	As above - in particular, referencing the Environment Bill – a major piece of legislation soon to finish Parliamentary process. Really important to mention specifically the 10% net gain requirement for all development (other than permitted development).		<ul style="list-style-type: none"> Reference Environment Bill and 10% net gain requirements 	As the Environment Bill has not yet been signed into law, would be inappropriate to sign into law.	BNG Policy
P1_00 206	Yes	Don't build on all AONB/Greenbelt		<ul style="list-style-type: none"> Don't build on AONB/ Green Belt Land 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00 219	Yes	As above		<ul style="list-style-type: none"> Should be no exceptions 	Noted	None
P1_00 244	Yes	(1) The significance of landowners / farmers needs to be identified. (2) Far too many mature trees located in and around residential properties are being felled across Three Rivers. 'Proof' that a tree is causing subsidence or is in a dangerous condition is often less than minimal. Please protect trees from opportunist property owners and opportunist 'tree surgeons'.		<ul style="list-style-type: none"> Significance of landowners/ farmers need to be identified; Too many mature trees around residential properties are being felled. 	Noted	None
P1_00 256	Yes	Farmland that is not actively farmed and adjacent to woodlands (e.g. Whippendell & Merlin's woods) should be compulsorily purchased and re-wilded with public amenity access.		<ul style="list-style-type: none"> Farmland not actively farmed and adjacent to woodland (e.g. Whippendell & Merlin's woods) should be compulsorily purchased and re-wilded 	Noted	None
P1_00 262	Yes	clamp down on light pollution, save bats		<ul style="list-style-type: none"> Reduce light pollution to save bats. 	Noted	None
P1_00 268	Yes	As listed in the reasons for stating No to whether or not this is the right approach.		<ul style="list-style-type: none"> Policy needs to be strengthened; Ensure assessed against most relevant matrix; Do not consider it acceptable to suggest that biodiversity gain can be achieved by offset somewhere else in the district (where not deemed achievable in the site under development); 	Noted	BNG Policy

				<ul style="list-style-type: none">landscaping of new developments be led by those with appropriate and independent expertise		
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