

Appendix 4 – Schedule of Representations – Housing Mix and Type

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Q3. Do you think the Preferred Policy Option for Housing Mix and Type is the right approach?						
SC_P1_0008_Home Builders Federation	Home Builders Federation		The Council have not set out in this consultation document a specific policy option to support the delivery of housing development to meet the specific needs of older people. Paragraph 63-006 of PPG sets out that plans should set clear policies as to how the housing needs of older people will be supported. One key way that such support can be clearly established is through the identification of needs for older peoples' housing and a commitment to meet that need. The HBF recognise that there is not a requirement in national policy to set out the level of housing needs for older people in a policy. However, we consider it that in order for such a policy to be truly effective and therefore sound the need for such accommodation should be identified in the local plan in order to support decision makers. In particular it will help decision makers to assess whether there is a shortfall in supply to meet the needs of older people to ensure a more positive approach to decision making should shortfalls be identified. Such an approach would also ensure transparency and support effective monitoring and review of the Council's approach to older peoples housing.	<ul style="list-style-type: none"> Council doesn't set out a specific policy option to support delivery of housing development to meet specific needs for older people. In particular it will help decision makers to assess whether there is a shortfall in supply to meet the needs of older people to ensure a more positive approach to decision making should shortfalls be identified. 	Preferred Policy Option 2 Housing Mix and Type sets out the requirements for specialist housing, accessible and adaptable buildings and the supporting text refers to the LHNA which has considered the needs for older people. The comment is about monitoring of older persons needs specifically for housing to identify shortfalls given the identified need for older persons housing.	No action
SC_0009_Sarratt Parish Council	Sarratt Parish Council	Support	We support this policy, but we request that additional clarification is added to cover the likely scenario where the housing mix for a local area, such as a village or a parish is different to that of Three Rivers District as a whole, and that targets can be suitably adjusted for those areas to achieve the desired needs for that community.	<ul style="list-style-type: none"> Supports policy Requests that where the housing mix for a local area such as a village or parish is different to that TRDC as a whole that targets be suitably adjusted for those areas to achieve the desired needs for that community 	Support noted Existing draft policy states the following: 2) In determining an appropriate housing mix, the Council will require proposals to take into account: a) The range of housing need in terms of the size and type of dwellings as identified by the Local Housing Needs Assessment (LHNA) and subsequent updates; b) Detailed local housing market assessments (where relevant); c) Current and future demographic profiles and population; d) The characteristics of the site which may influence its ability to accommodate a mix of housing, including its size, location and constraints and opportunities for development; e) Evidence of local market signals, trends and circumstances; The draft policy will allow for a different housing mix than set out in the most recent LHNA where a detailed local housing market assessment supports this.	No action
SC_0009_Watford Borough Council	Watford Borough Council	yes	It is unclear what the self-build requirement is on strategic sites. The focus on high quality development is supported. To help meet the shortfall of housing proposed, an approach to higher density development should be set out, particularly to support higher density development in the service centres where people have good access to services, facilities and public transport. This should be reflected in the site capacities set out in the site allocations.	<ul style="list-style-type: none"> It is unclear what the self-build requirement is on strategic sites. The focus on high quality development is supported. To help meet the shortfall of housing proposed, an approach to higher density development should be set out, particularly to support higher density development in the service centres where people have good access to services, facilities and public transport. This should be reflected in the site capacities set out in the site allocations. 	Noted.	Add Self- build requirement on strategic sites
SC_00020_Chorleywood	Chorleywood Parish Council		We are pleased that the policy allows flexibility to deliver new homes that meet local housing needs. Whilst we have no objection to the proposed policy for unit mix in principle, however we believe it could be strengthened. It has been noted that often developers will come forward with a homogenous unit mix at application stage which appears to have gone unchallenged by Officers.	<ul style="list-style-type: none"> No objection to proposed policy but believe it can be strengthened. Developers often will come forward with a homogenous unit mix at 	<ul style="list-style-type: none"> Noted. The SHMA provides an overview of the housing type and mix needed within TRDC. This is the starting point for negotiations 	No change

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Parish Council			The Housing Mix section still uses the 2016 based population projections despite the 2018 based projections having been available since March 2020. The projections change quite a bit so this is material and should be updated.	application stage which appears to have gone unchallenged by Officers. The Housing Mix section still uses the 2016 based population projections despite the 2018 based projections having been available since March 2020. The projections change quite a bit so this is material and should be updated.	with developers and site mix will be dependent on the type of accommodation provided.	
SC_0002 3_Croxley Green Parish Council	Croxley Green Parish Council	No	Design of the buildings in their setting is particularly important and this should support the approach in the Neighbourhood Plan to protect the character of the various areas in Croxley Green. We draw attention to the comments in Jed Griffiths' statement and suggest the policy should be based on the most up to date data. We have concerns that the balance of housing may not adequately reflect the changing needs of the community following Brexit and the pandemic. Progress towards these targets should be monitored and the figures should be kept under constant review. Although we support the approach in general we consider any larger site (over 10 units) should be developed with a master plan approach.	<ul style="list-style-type: none"> The policy should be based on the most up to date data following Brexit and Covid-19 pandemic. Concerns that the balance of housing may not adequately reflect the changing needs of the community following Brexit and the pandemic. Progress towards these housing targets should be monitored and the figures should be kept under constant review. Although we support the approach in general we consider any larger site (over 10 units) should be developed within a master plan approach. 	<ul style="list-style-type: none"> Noted. The Government's standard methodology is based on long term trends. The Coronavirus is considered to be a short term trend and will not affect overall growth rates. In regards to Brexit, there is no clear evidence of the impacts that this has on the population changes. The Council will continue to monitor any changes to the government's standard methodology through the Annual Monitoring Report and its subsequent implications for Three Rivers Local Plan. TRDC has a housing delivery Action Plan which monitors housing delivery. Sites over 50 dwellings are subject to masterplan process. 	No action
SC_0002 4_Abbots Langley Parish Council	Abbots Langley Parish Council		The mix of housing bears no strategy as to how this will be mixed on individual sites, it is important that all these house types are mixed together on all sites to create an integrated society. Also if elderly residents have access to quality smaller homes within the proposed mixed housing area, this would free up a large proportion of larger accommodation within the district and reduce the need for the larger houses. Sites for Self Build need to be better provided and more numerous across the allocated sites, this allows a form off first time affordable accommodation and also provides a more localised economy utilising local trades	<ul style="list-style-type: none"> Support for the different mix of housing on site but considers no strategy for how this will happen on site- I suspect they want a breakdown of each individual site by type and mix 	Noted. The SHMA provides an overview of the housing type and mix needed within TRDC. This is the starting point for negotiations with developers and site mix will be dependent on the type of accommodation provided.	No action
SC_0002 6_HCC Growth and Infrastructure	HCC Growth and Infrastructure		<p>Adult Care Services. The provision of appropriate housing for both older people and people with disabilities is critical, which is underpinned by the National Planning Policy Framework (NPPF). The older population of Three Rivers (over 65s) is predicted to increase by 30.5% by 2040 (POPPI data, accessed July 2021). Of these it is estimated that 2,577 people aged between 65 and 74, and 4,895 people aged over 75 will be living alone. Projections also show an increase of 283 (44%) people living in a residential care home with or without nursing care during the same period. Research shows that social isolation and inappropriate housing are key determinants of poor health outcomes in all people, but especially for those who have disabilities or over 65. Extra care housing, specifically designed to improve health and social connection and built in areas that strengthen local communities and place shaping activities, can help alleviate stress on public services, allow local communities to remain intergenerational, and can help release under-occupied housing back into the general market helping to balance housing need across the district.</p> <p>The county council's Adult Care Service (ACS) has developed a local set of design standards to ensure there is a good, consistent extra care offer in the county. A minimum of 50 units, up to 130 units as a maximum for each scheme is considered optimum, with guidelines and features of minimum site and height sizes for each scheme included. The table below shows approximate dimensions as a guide, although each scheme should be assessed on a site by site basis. These ACS design principles have been shaped by national standards, good practice and excellent schemes in other areas. The Council does not own any of the existing extra care schemes in Hertfordshire, so collaboration and partnership working with our housing associations and districts will be required, and will include residents and the local community, in line with co-production principles.</p> <p>Hertfordshire's set of design standards aims to support the delivery of specialist housing options for older people. The guide has been developed for architects, developers and housing providers delivering homes including homes for private sale and a range of affordable housing tenures. By meeting the standards in the guide, new homes for older people in Hertfordshire are expected to achieve excellence in quality and desirability. Along with above site size guidance, it is essential that new extra care housing be close to good public transport links, be a short walk to local amenities, local shops and health care, have private outdoor space as well as shared private gardens, a communal lounge, plus a range of staff facilities. Ideally, they should also include a</p>	<ul style="list-style-type: none"> Preferred Policy Option 2 It is suggested that TRDC should clearly define which type of specialist and supported accommodation are supported as part of this policies. It is recommended that the National Expectations for Supported Housing (MHCLG, 2020) should be referred to either in the policy or in the supporting text to provide further guidance. HCC also recommend that building regulation part M4(2) should be complied in relevant development with a proportion meeting M4(3) standard. The district council should liaise with relevant HCC teams at an early stage of any development proposals that involves specialist accommodation. 	Noted. The need for extra care housing within TRD and the County Council design standards for allocations of 50 units and more.	Revisit specialist housing policy and make reference to 50 dwellings or more to adhere to HCC design guidance.

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			<p>communal café/restaurant, activity and health and fitness space. HCC welcomes the opportunity to work with stakeholders at the early stages of design.</p> <p>Preferred Policy Option 2, Housing Mix and Type Paragraphs 4) and 5) It is suggested that TRDC should clearly define which type of specialist and supported accommodation are supported as part of this policies. It is recommended that the National Expectations for Supported Housing (MHCLG, 2020) should be referred to either in the policy or in the supporting text to provide further guidance. HCC also recommend that building regulation part M4(2) should be complied in relevant development with a proportion meeting M4(3) standard.</p> <p>New specialised and supported accommodation should be, wherever possible, made available in all tenure types. Where possible, rent level of those accommodation should be affordable or at least set at current market rate. The district council should liaise with relevant HCC teams at an early stage of any development proposals that involves specialist accommodation.</p>			
SC_0002 7_TFL Commercial Development	TFL Commercial Development		<p>With regard to part 3 of this policy it is unclear if the expectation is that every major housing proposal of 100 dwelling or more would have to include specialist and supported housing. If this is the intention of the policy then TFL CD would suggest that this may not be appropriate in every case, and so the policy should include the flexibility for schemes not to include specialist and supported housing where it can be justified. In part 6 there is reference to 'strategic sites', it would be useful to clarify what a strategic site is as a search of the document does not make this clear.</p>	<ul style="list-style-type: none"> Unclear if expectation is that every major housing development of 100 dwelling or more would be appropriate in every case, policy should include the flexibility for schemes not to include specialist and supported housing where it can be justified. 	Noted. Developments of 100 dwellings or more are required to provide a mix and type of housing. Specialist housing will be sought in areas of need.	Definition of strategic site to be included for clarification
PL_0000 2_ACFS8 b	ROK Planning on behalf of Woolbro Group 210818 - TRDC Reg 18 - ROK OBO WOOLBRO FINAL		<p>1.24 The commitment to expect higher densities than 50 dwellings per hectare in areas well served by public transport, services and facilities is welcomed. It is clear that density in such locations should be maximised to ensure sustainable development.</p> <p>1.25 However, more justification is required for the 'at least' 50 dwellings per hectare target density. It is considered that this is an arbitrary figure and maximisation of housing delivery across the District should be carried out on a site-by-site basis, with a focus on good design to optimise sites.</p> <p>1.26 The recently adopted London Plan is relevant and assists in providing a robust and sound planning policy basis whereby housing density is determined by design and not an arbitrary numerical target. Policy D3 'Optimising site capacity through the design-led approach' (Appendix 3) establishes that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. It also dictates that "higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling... in other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way".</p>	<ul style="list-style-type: none"> Commitment to densities above 50DPH in accessible areas is welcomed More justification is required for the "at least" 50 DPH target density. 50 DPH+ is an arbitrary figure and maximisation of housing delivery should be undertaken on a site by site basis with focus on good design to optimise capacity on sites. Policy D3 from London Plan is example of design-led approach to optimising capacity of sites 	Noted.	To be addressed in PPO23 Housing Density policy.
PL_0001 4_CFS22	ROK Planning on behalf of landowner Regulation 18 representati on		<p>The commitment to expect higher densities than 50 per hectare in areas well served by public transport, services and facilities is welcomed. It is clear that density in such locations should be maximised to ensure sustainable development.</p> <p>However, more justification is required for the at least 50 dwellings per hectare density target. It is considered that this is an arbitrary figure and maximisation of housing delivery across the District should be carried out on a site-by-site basis, with a focus on good design to optimise sites.</p> <p>The 2021 London Plan is relevant and assists in providing a robust and sound planning policy basis whereby housing density is determined by design and not an arbitrary numerical target. Policy D3 'Optimising site capacity through the design-led approach' (Appendix 5) establishes that all development must make the best use of land by following a design-led approach that optimises the capacity of sites; this new policy removed the density matrix included within the London Plan 2016. It also dictates that "higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling...in other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way".</p>	<ul style="list-style-type: none"> Commitment to densities above 50DPH in accessible areas is welcomed More justification is required for the "at least" 50 DPH target density. 50 DPH+ is an arbitrary figure and maximisation of housing delivery should be undertaken on a site by site basis with focus on good design to optimise capacity on sites. Policy D3 from London Plan is example of design-led approach to optimising capacity of sites 	<ul style="list-style-type: none"> Noted. 	To be addressed in PPO23 Housing Density policy.
PL_0000 5_CFS3 CFS18b CFS56	Pegagus Group on behalf of Taylor Wimpey Strategic Land		<p>2.16 In line with the NPPF, it is important that development promotes the effective use of land in meeting the needs for homes (paragraph 119), especially where difficult decisions relating to the release of land from the Green Belt are involved.</p> <p>2.17 The policy promotes high quality residential development that respects the character of the district, making the most efficient use of land, without compromising the quality of the environment and provides a target density of at least 50 dwellings per hectare (dph).</p> <p>2.18 The evidence base indicates that development densities in Three Rivers have averaged between 30-50dph in recent years, with higher densities being achieved in town centre locations. It is important, as proposed, that the policy provides flexibility to allow for lower densities where this is justified to ensure that new development is well-designed and reflects the character and context of the site in question and appropriately reflects local housing needs. Linked to Question 3 above, the evidence base identifies a higher level of need for family homes (3 & 4 bed market homes of 43% and 30% respectively), a trend which the Covid-19 pandemic has exacerbated as families</p>	<ul style="list-style-type: none"> Important that the policy provides flexibility to allow for lower densities where this is justified. Higher need for family sized homes (3 & 4 bed homes) in Three Rivers (as set out for Housing Mix policy) which may create challenge for achieving high density development. 	<ul style="list-style-type: none"> Noted. Considered that policy allows sufficient flexibility for optimising the use of land and securing an uplift in density but also ensuring regard for the character and amenity. Noted. 	No action

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		<p>have moved out of London in the search for more space, and therefore this may create challenges for achieving high density development. However, the policy approach is supported insofar as ensuring development makes the most efficient use of land, balanced with the need for development to meet local housing needs and respect the character and context of the local area.</p>																							
<p>PL_0002 7_CFS64</p>	<p>Nexus Planning on behalf of Inland Homes</p>	<p>4.1 Preferred Policy Option 3, as outlined in the Consultation Document, states at criterion 2 that new housing developments should achieve a minimum density of 50 dwellings per hectare (“dph”). Criterion 3 then outlines that lower densities can be justified in some instances, with the following examples provided:</p> <ul style="list-style-type: none"> • within an area of historic or landscape value; or • for specialist forms of accommodation. <p>4.2 This is unusually high, and as a general rule of thumb for plan-making purposes, a density of circa 35dph is generally used to estimate the development capacity of greenfield sites.</p> <p>4.3 Paragraph 4.32 and of the Consultation Document discuss the variance in development densities of housing completions within the District, and notes that these depend on the nature of the schemes. In terms of locations, paragraph 4.33 states that the average density in Rickmansworth Town Centre, the Principal Settlement in the District, is 52dph, whilst at Chorleywood the average density is only 18dph. Given the number of greenfield sites identified for housing within the Part 2 Consultation Document, basing the proposed density of development for the whole Plan area on the average density of the urban area of its principal settlement, which has the highest density, is a somewhat blunt approach that fails to have any regard to local variation and distinctiveness.</p> <p>4.4 Applying this approach will have a number of implications, which will ultimately prejudice the Plan’s ability to deliver a sustainable development and to facilitate ‘beautiful’ development, which is a key Government agenda emphasised by the recent revision to the Framework. Whilst the Framework seeks for developments to make efficient use of land (paragraph 119) it is also clear at paragraph 124 that the consideration of the following matters should be used to inform what is an appropriate density:</p> <p>a) “the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;</p> <p>b) “local market conditions and viability;</p> <p>c) “the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;</p> <p>d) “the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</p> <p>e) “the importance of securing well-designed, attractive and healthy places.”</p> <p>4.5 Consideration of the proposed minimum density against these requirements is undertaken below: Criterion a)</p> <p>4.6 The LHNA identifies the following housing mix requirements for Three Rivers District (Tables 71, 72 and 73):</p> <table border="1" data-bbox="590 1451 1570 1692"> <thead> <tr> <th>Size</th> <th>Market</th> <th>Affordable Ownership</th> <th>Affordable Rent</th> </tr> </thead> <tbody> <tr> <td>1 bed</td> <td>5%</td> <td>21%</td> <td>40%</td> </tr> <tr> <td>2 bed</td> <td>23%</td> <td>41%</td> <td>27%</td> </tr> <tr> <td>3 bed</td> <td>43%</td> <td>28%</td> <td>31%</td> </tr> <tr> <td>4+ bed</td> <td>30%</td> <td>9%</td> <td>2%</td> </tr> </tbody> </table> <p>4.7 Noting that Preferred Policy Option 4 requires 40% of the dwellings to be affordable rent units and a further 10% to be affordable sale units, the housing mix requirement for new housing developments will be as follows:</p>	Size	Market	Affordable Ownership	Affordable Rent	1 bed	5%	21%	40%	2 bed	23%	41%	27%	3 bed	43%	28%	31%	4+ bed	30%	9%	2%	<ul style="list-style-type: none"> • The proposed minimum average density of 50dph is driven by a desire to limit the release of land from the Green Belt. Whilst this has logic in a strategic sense, it has to be applied with acknowledgement of the specific circumstances that prevail. In this instance, the Council’s approach has demonstrably failed to strike an appropriate balance between limited development in the Green Belt and delivering high quality developments that reflect their surroundings. This approach conflicts with each of the provisions of Framework paragraph 124 and, consequently, some of the other Preferred Policy Options thus generating internal conflicts (as discussed later in these representations). <p><u>Recommended Changes</u> The Plan needs to identify a more realistic density of development, particularly for greenfield sites and we would suggest that a density for urban sites is identified and a density for greenfield sites. This will undoubtedly reduce capacity assumptions for the sites that the Council has selected as potential housing allocations and it will therefore need to identify further deliverable sites (such as the Site) to make up the shortfall (notwithstanding our response to Question 1).</p>	<ul style="list-style-type: none"> • Noted. 	<p>To be addressed in PPO23 Housing Density policy.</p>
Size	Market	Affordable Ownership	Affordable Rent																						
1 bed	5%	21%	40%																						
2 bed	23%	41%	27%																						
3 bed	43%	28%	31%																						
4+ bed	30%	9%	2%																						

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Size	Proportion of dwellings
1 bed	20.5%
2 bed	26.5%
3 bed	36.5%
4+ bed	16.5%

4.8 In light of the above, every residential developments involving a net gain of one or more dwelling must include circa 53% of the housing as 3 or 4 bed dwellings. It is difficult to visualise how this can be achieved with an average density requirement of 50dph, and is therefore not a deliverable strategy.

4.9 Therefore, it is clear that the implementation of Preferred Policy Option 3 would not facilitate the delivery of the housing required to meet the identified needs of the District, and it would result in development conflicting with paragraph 124a of the Framework.

Criterion b)

4.10 As outlined above, the local housing market requires more than half of dwellings as 3 or 4 bedroom properties i.e. family houses. This is unsurprising for this District given the market is somewhat orientated around people moving out of London (as recognised at paragraph 2.9 of the Consultation Document) for larger dwellings and more outside space.

4.11 Developers will want to deliver housing to reflect market demand and therefore the proposed density of 50dph for all sites is not amenable to the market conditions in this locality as it would drive a disproportionately high number of small units and flats.

Criterion c)

4.12 Whilst the District is well-served by public transport connections, not all sites identified by the Council (or other suitable land parcels, such as the Site) are at public transport nodes where higher densities are generally directed. Many parts of the District include more rural areas where residents will be, to some degree, reliant on the private car.

4.13 Whilst we fully support measures to maximise the use of more sustainable transport modes, there has to be an acknowledgement that given the number of greenfield allocations necessary to meet housing needs, access to services and facilities at such locations is unlikely to be a reason to justify higher densities.

Criterion d)

4.14 The updated version of the Framework places greater emphasis on design quality, and the achievement of beautiful places.

4.15 Whilst paragraph 129c states that planning decisions should allow for increased densities, it is also clear that it must be sympathetic to the surrounding built environment and landscape setting.

4.16 Densities at 50dph may well be appropriate in the town centres, but the density of edge of settlement greenfield site allocations will need to reflect the prevailing character and the grain of development which is generally suburban and substantially lower than 50dph.

Criterion e)

4.17 By applying a flat rate of 50dph across sites to establish a development capacity (which the Council has done – as evidenced by the Sites for Potential Allocation consultation document), we are concerned that the Council has sought to maximise the development capacity of a Site at the cost of other important considerations. For example, delivering a higher density would then generate a high open space requirement. The Framework is clear at paragraph 98 that open space delivers vital benefits to communities, and paragraph 169 requires the provision of SuDS with all major development.

4.18 Preferred Policy Option 22 requires residential developments of 25 dwellings or more (or on sites of more than 0.6ha) to set aside 10% of the site area for open space – which in our experience appears quite low and a somewhat basic approach given it uses site area to drive open space provision rather than site occupancy.

4.19 In any event, using the example of proposed site allocation EOS12.3 (Land to the North of Chalfont Lane) - a greenfield site in a prominent location on the northern edge of Maple Cross - if 10% of this site is required as open space, this will reduce the developable area to 3.33ha. Based on the site's estimated capacity of 176 dwellings, the required density of development would be

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		<p>53dph without taking into account SuDS, ecological enhancements and other infrastructure requirements that would increase this further. Applying the requirements of criterion d) of Framework paragraph 124, this would clearly not be appropriate.</p> <p>4.20 It is therefore clear, even by using one example that development at 50dph will not allow for high quality open spaces to be provided, and conflicts with the aspirations of criterion e).</p> <p>4.21 In summary, the proposed minimum average density of 50dph is driven by a desire to limit the release of land from the Green Belt. Whilst this has logic in a strategic sense, it has to be applied with acknowledgement of the specific circumstances that prevail. In this instance, the Council's approach has demonstrably failed to strike an appropriate balance between limited development in the Green Belt and delivering high quality developments that reflect their surroundings. This approach conflicts with each of the provisions of Framework paragraph 124 and, consequently, some of the other Preferred Policy Options thus generating internal conflicts (as discussed later in these representations).</p> <p><u>Recommended Changes</u></p> <p>4.22 The Plan needs to identify a more realistic density of development, particularly for greenfield sites and we would suggest that a density for urban sites is identified and a density for greenfield sites. This will undoubtedly reduce capacity assumptions for the sites that the Council has selected as potential housing allocations and it will therefore need to identify further deliverable sites (such as the Site) to make up the shortfall (notwithstanding our response to Question 1).</p>			
PL_0002 9_CFS69	Bell Cornwell on behalf of DNA Capital	<p>We support the proposed housing density and approach to delivering housing in the District. Larger sites will need to be carefully planned to ensure that the mix and type of housing reflects the required density together with the character of the site.</p>	<ul style="list-style-type: none"> Support policy and approach. Larger sites need careful planning. 	Noted	No action
Cedars Village, Chorleyw ood		<p>Need for Specialist Housing</p> <p>Preferred Policy Option 2 (Housing Mix and Type) sets out that all large scale major housing proposals (delivering 100 dwellings or more) "should be accompanied by a strategy to ensure a diversity of housing on the site including... housing to meet the requirements of different groups (specialist and supported housing)".</p> <p>6.4 Based on our Client's extensive experience in the sector, a minimum of 60 extra care housing units are required in order to make an extra care development viable. However, in order to provide a full range of amenities (to the health and wellbeing benefit of residents, and with an affordable service charge), extra care developments should comprise 100 or more units. In addition, due to the care requirements, Extra Care Housing rarely comes forward as a component of larger planned development and are most effectively delivered via specific purpose build developments by retirement and extra care accommodation providers.</p> <p>6.5 On the basis of the above we do not consider that the approach set out within preferred policy option 2 (i.e. expecting appropriate specialist housing for older people to come forward as part of large-scale development proposals), is solely sufficient to meet the need. The proposed approach would not result in this the need for older persons housing being adequately addressed and, therefore, would fail to respond to the strategic objective. As such, we do not consider this to represent a 'sound' approach.</p> <p>6.9 In order to meet the level of need identified (plus the additional 2 years 2036-2038 not accounted for), a range of means of delivery should be supported within the policy. In addition to requiring specialist housing for older people on strategic sites (as currently drafted), specific sites should be allocated for Extra Care development. The policy should also offer explicit support to the expansion and enhancement of existing Extra Care communities.</p> <p>6.10 Expansion of existing communities can be delivered early in the plan period as the infrastructure required to support these addition dwellings, including communal facilities, is already available. In addition, enhancement of existing communities should also be supported as this improves the facilities on offer to residents and, consequently their quality of life/wellbeing which relieves pressure on local health care service.</p> <p>Preferred Policy Option 2, Housing Mix and Type</p> <p>7.8 This preferred policy is unsound for the reasons set out fully at sections 5 and 6 of these representations. To summarise:</p> <ul style="list-style-type: none"> - This policy does not seek to address the housing need of the District and does not comply with the Government's Standard Method for calculating the housing need figure. - The policy (and the emerging plan including site allocations) does not adequately seek to address the increasing demand for older peoples housing identified within the SMHA 2020. - A target for older persons housing (to include a breakdown by type and tenure) should be set out within policy. - Specific allocations for older persons housing should be included within the plan. 	<ul style="list-style-type: none"> Have identified a need for 60 bed unit, but to provide a full set of amenities should be 100 units; Extended two years 2036-2038 not accounted for; Can be delivered early as infrastructure is already in place; Target for older person housing should be set out in the policy. 	Extra Care Units have not been brought forward in development in viability. The threshold of 100 units is considered viable.	

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			<p>- Opportunities to expand/optimize the densities of existing older persons housing developments should be specifically supported.</p> <p>7.9 The plan notes at paragraph 4.13 that “The largest growth in population is expected from people aged 65 and over, with this group expected to increase by 44.2% in the period 2020 – 2036.” In light of the acute unmet need arising from this demographic, the Plan should include a specific policy to support the delivery of older persons housing including Extra Care housing within purpose-built developments/communities.</p>			
The Puffing Field, Windmill Hill, Chipperfield			<p>Preferred Policy Options – Preferred Policy Option 2 (Housing Mix and Type)</p> <p>2.8 Preferred policy option 2 is supported, and in particular, the reference to self-build and custom-build housing being supported. Whilst it is noted that strategic sites will be required to make provision for serviced plots for self-build and custom build housing, the plan should also include policies that provide support for self-build proposals on other suitable sites within the district, that are well related to the built-up area and in close proximity to services and facilities.</p> <p>2.9 The Government places great importance on the provision of self and custom build housing, and this was also reinforced in the Planning White Paper – Planning for the Future 2020. The White Paper outlined its support for innovative developers and housebuilders which includes self-builders, as it is recognised that their development will make a meaningful contribution to the supply of housing. It also stresses the importance of local authorities identifying enough land to meet the requirements identified on their self-build and custom housebuilding registers.</p> <p>2.10 Three Rivers has a self-build register (in accordance with the Self-build and Custom Housebuilding Act 2015). It is therefore important that the new local plan contains policies that will meet the demand on the register for serviced plots. To date very few, if any, of the 76 people on the self-build register since its inception have been offered serviced plots, despite the fact Three Rivers data shows that 84 self-build plots have been granted since 2016 and counts these plots as evidence of supply meeting/exceeding demand from the register.</p>	<ul style="list-style-type: none"> Support the policy; Need the new local plan to have policies that meet demand on the register for serviced self-build plots. 	<ul style="list-style-type: none"> Noted. The policy requires developments of self-build plots. 	No Action
P1_0000 2_	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"> Enhance the design guide and limit to four stories 	Noted	None	
P1_0000 3_	Yes	Seems Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None	
P1_0000 5_	No	I am not sure what 50 dwellings per hectare means. Could examples of areas at this density within the area be identified so that a view can be taken?	<ul style="list-style-type: none"> Show or specify what a 50dph scheme is. 	Noted – This would be part of a Design SPD if shown.	None	
P1_0000 6_	Yes	In order to sustain our neighbourhood we need regulations and a plan to ensure that ‘land grab’ is not allowed. Even though there is a need to provide more housing within the district, squeezing more houses within back gardens without due attention being paid to the immediate surroundings is to be positively prevented.	<ul style="list-style-type: none"> Agree with approach. Prevent more houses within back gardens 	Noted	None	
P1_0001 4_	No	It should be the minimum at all times and why are we needing more housing when there are so many empty buildings in the area.	<ul style="list-style-type: none"> Bare minimum standard, don’t need more housing due to number of empty buildings in the area 	Noted	None	
P1_0001 7_	No	Housing density will be too high as it will be the developers and not you that will determine the space allocation. And of course they can only make a profit when the houses are all sardines	<ul style="list-style-type: none"> Density is too high, developers determine density not the Council 	The density has been calculated using an up to date evidence base. The developers will also need to meet the national minimum space standards when meeting development standards.	None	
P1_0001 9_	Yes		<ul style="list-style-type: none"> No Comment 	Noted	None	
P1_0002 0_	Yes	Covers all needs	<ul style="list-style-type: none"> General Support 	Noted	None	
P1_0002 1_	Yes	I don’t know	<ul style="list-style-type: none"> No opinion 	Noted	None	
P1_0002 3_	No	In the context of the current pandemic and the behaviours we must now all adopt to sustain public health, a target density of 50 dwellings per hectare should be re-considered and potentially lowered.	<ul style="list-style-type: none"> Due to Covid behaviours, current density of 50dph should be lowered 	Noted	None	
P1_0002 4_	Yes	I agree this is the right approach however I have concerns that public transport is insufficient to meet current needs. All public transport needs to be more affordable and reliable to encourage people to use it and take the strain off of local roads which are already heavily congested at peak times.	<ul style="list-style-type: none"> Agree with approach but public transport needs to be enhanced to meet current and future needs 	Noted.	None	
P1_0002 5_	No	No amount of housing will be positive to the character of the area.	<ul style="list-style-type: none"> Will affect the character of the area. 	Noted	None	
P1_0002 6_	Yes	No other option really	<ul style="list-style-type: none"> No objection 	Noted	None	
P1_0002 7_	Yes	Generally Yes	<ul style="list-style-type: none"> Support 	Noted	None	
P1_0003 2_	Yes	This approach will encourage lower cost housing.	<ul style="list-style-type: none"> Will support lower cost housing 	Noted	None	
P1_0003 3_	Yes	It considers the historical character of the area.	<ul style="list-style-type: none"> Agree with approach 	Noted	None	

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P1_0003 4_	Yes	It seems from the number of dwellings proposed in each area of Three Rivers that the number proposed in Maple Cross and West Hyde is totally disproportionate to all other areas over 1500 dwellings proposed! It is noted that Sarah Nelmes states ... "balanced approach for new homes and local facilities.... to benefit new and existing residents preserve local open spaces" Maple Cross and West Hyde being an outlying area seem frequently like the forgotten areas and residents treated as second class. There has never been sufficient infrastructure; transport, leisure facilities, youth facilities, health services etc are all sadly lacking and have been for the 50 years I have lived here. Facilities like these should be considered, planned, approved and commenced before any more dwellings are built. Look after the existing population first. The use of cars is mentioned, it is inevitable that car use in the area is high given the woeful lack of frequent transport. Also although Herts CC is responsible for street lighting the inadequate lighting makes using buses positively dangerous after dark - the journey from stop to home would be fraught with possible dangers of falling or fear of being assaulted. All these things should be improved for existing community before subjecting us to more disruption and inconvenience, at present we have HS2 construction making road journeys difficult and the environmental impact is obviously having a great impact.	<ul style="list-style-type: none"> Number of homes proposed in Maple Cross and West hpe is disproportionate to all other areas of Three Rivers (1,500 dwellings); Infrastructure needs to be in place before development takes place. Car use ois high and cannot be addressed with public transport due to lack of transport and is not safe with lack of street lights; HS2 construction is making road journeys difficult 	Noted – See Part 2 Comments for response to specific sites.	None
P1_0003 8_	Yes	Important not to over develop to maintain the character of the area	<ul style="list-style-type: none"> Agree with approach but do not overdevelop and maintain character of the area. 	Noted	None
P1_0004 0_	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_0004 1_	Yes	It makes complete sense. I particularly like the fact that lower density development would also be considered when appropriate.	<ul style="list-style-type: none"> Support for Policy 	Noted	None
P1_0004 5_	No	It would be useful to include a requirement that where Green Belt land is sacrificed, the development on it is of lower density.	<ul style="list-style-type: none"> Where Green Belt Land is to be developed, should be of lower density 	Noted	None
P1_0004 6_	Yes	different densities are needed	<ul style="list-style-type: none"> Need different densities 	Noted	None
P1_0004 7_	Yes	Given the potential devastating impact on the environment of the Three Rivers district, it is key that the density of the new housing is high.	<ul style="list-style-type: none"> Agree with approach – High densities are required to avoid environmental impacts 	Noted	None
P1_0004 8_	No	Lower density schemes are more sustainable in the long term. High density schemes with a lack of parking cause issues with surrounding areas. Scheme should respect the character of adjoining areas and settlements - not the 'district' as a whole.	<ul style="list-style-type: none"> Lower densities more sustainable long term; High density with no parking cause issues in surrounding area; Need to respect the character 	Noted	None
P1_0004 9_	No	Lack of light and being part of a community is difficult in high density properties.	<ul style="list-style-type: none"> Is a lack of light/ no community in high density developments 	Noted	None
P1_0005 0_	Yes	It is critical not to build to a density too high for the area, with particular regard to the pressure it puts on the area for additional local services. A new school for example has just been built to serve	<ul style="list-style-type: none"> High density puts pressure on local infrastructure. New school has just 	Noted	None

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			the local area. It would be no good building so many new dwellings that another school would be required in the near future.	been built, building too many homes would require more schools		
P1_0005 3_	No	No thoughts or plans for surrounding roads etc has been published as part of the plan (especially in regards to Toms Lane) which will result in huge amount of traffic and congestion.		<ul style="list-style-type: none"> No plans for surrounding roads has been published (especially regarding Tom's Lane) 	Noted	None
P1_0005 4_	Yes	Overcrowding isn't good for anyone's wellness		<ul style="list-style-type: none"> Will lead to overcrowding 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0005 5_	Yes	It seems to be the only option unless the government reduces the target number of homes required		<ul style="list-style-type: none"> Agree with Approach, only way to meet housing targets 	Noted	None
P1_0005 6_	No	Basing the policy upon 'at least 50 dwellings per hectare' (reflecting the density of Rickmansworth Town Centre), is completely inappropriate for large parts of Three Rivers, as it encourages the use of high-rise blocks, and undermines attempts elsewhere in the policy document to protect local character and amenity. Density calculations should be based on existing rates in much more locally defined areas.		<ul style="list-style-type: none"> 50 dwellings per hectare (from Rickmansworth TC) and applying to whole district is inappropriate); Density calculations should be based on local rates 	Noted. DPH is indicative only and will be determined at the planning application stage.	None
P1_0005 7_	No	No, too concentrated for environment.		<ul style="list-style-type: none"> Will lead to overcrowding 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0006 3_	No	You can reduce housing density by limiting the kind of development i.e., for starter homes and homes for the elderly/retired.		<ul style="list-style-type: none"> Can reduce density by limiting kind of development (i.e. starter homes and homes for elderly) 	Noted	None
P1_0006 4_	No	Higher density makes sense nearer public transport, but should come with spend on infrastructure and public services.		<ul style="list-style-type: none"> Higher density nearer public transport, but with more contribution to the infrastructure and public services. 	Noted	None
P1_0006 6_		How can you justify 50 houses per hectare, the roads, public transport, services facilities and shops cannot cope at the moment. Should be more like 10 hoses per hectare this would ease all the above problems and would also manage to keep the village feel		<ul style="list-style-type: none"> No justification for 50dph, will have unacceptable impact on infrastructure; Should be 10dph. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0006 8_		Again, I'm not giving you a blank cheque to cash any time in the next 18 years! Density can be a BIG PROBLEM – as well you know! I do not want to see great expanses of rural Rickmansworth turned into a battery farm for humans – as much as it might be a dream of the Council to pack in as many Taxpayers to the acre as possible. And yes, let's go back to Acres - over half the country left Europe so let's go back to being Anglo Saxon! Some developments could be 25 to the acre - providing they are shoeboxes! Larger houses obviously need more space.		<ul style="list-style-type: none"> Will impact the character and people will be living in shoeboxes. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0006 9_	No			<ul style="list-style-type: none"> Do not agree with approach but no comment 	Noted	None
P1_0007 1_		I understand that the total of the proposed housing development in the TRDC area exceeds more realistic forecasts for additional homes. I therefore support the request for the Chorleywood Residents Association for the Local Plan to be withdrawn and to be replaced by a plan for a lower number and density of new dwellings.		<ul style="list-style-type: none"> Needs to withdraw local plan and replace with a plan for lower figures 	Noted	None
P1_0007 4_		I agree although it is difficult for me to imagine the actual housing density in Rickmansworth town centre due to the mix of building types and uses. I would prefer to see a clearer example of an existing development please.		<ul style="list-style-type: none"> Need clearer examples rather than Rickmansworth Town Centre 	Clearer examples would be provided as part of a Design Guide SPD	None
P1_0007 6_	No	There isn't the infrastructure in Chorleywood to support the densities of housing being suggested. The roads are too narrow to support so many new residents. Berry Lane and Long Lane are already hazardous with current traffic levels. I drive down them regularly for work and most days it is a very tense drive, I often have to reverse where corners mean you don't see oncoming traffic in order to pre-empt where you will need to stop and wait. Adding so many new homes will be disastrous for current and future residents.		<ul style="list-style-type: none"> Chorleywood cannot support a higher density due to narrowness of roads, especially Berry Lane and Long Lane. More homes will make problem worse. 	Noted	None
P1_0007 8_	Yes	Yes but my earlier comments about this proposals being vulnerable to developers planning appeals apply!		<ul style="list-style-type: none"> Earlier comments about proposals being vulnerable to planning appeals apply. 	Noted	None
P1_0008 0_	No	Do not build more houses		<ul style="list-style-type: none"> No more housing in the area 	Noted	None
P1_0008 4_	Yes	Any more than 50 hectares of dwelling is very adequate for the area.		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_0008 8_	No	I would expect to see comments which include the need for green space, that includes space around existing trees,		<ul style="list-style-type: none"> Need commentary on requirement for green space 	Noted	None
P1_0008 9_	Yes	The 50 dwellings per hectare seems more than adequate to build in Chorleywood.		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_0009 1_	Yes	NC		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_0009 6_	No	Housing density should be consistent with older properties in the area		<ul style="list-style-type: none"> Needs to be consistent with older properties in the area 	Noted	None
P1_0009 7_	Yes	Density of housing should be closely monitored. More affordable housing and fewer mansions!		<ul style="list-style-type: none"> Agree with approach but needs to be monitored and have more affordable housing. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0009 8_	No	You cannot protect existing habitats and environments if you build on them. It will create blocks in wildlife corridors and destroy grasslands and flight paths. We need green space and the character that we already have.		<ul style="list-style-type: none"> Cannot protect environments if built on 	Noted	None

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P1_0009_9_		No	Housing should be less dense with more green space which benefits wildlife and mental health. A sense of place is very hard to achieve with dense housing.	<ul style="list-style-type: none"> Housing should be less dense with more green spaces 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0010_1_		Yes	See my previous comment about encouraging building on existing large gardens, this will push up the overall housing density in the district	<ul style="list-style-type: none"> Built on existing large gardens will push up densities 	Noted	None
P1_0010_2_		Yes	Housing density should be appropriate to the facilities, infrastructure and any special characteristics of the area. However ensuring that appropriate infrastructure is provided with new development is critical.	<ul style="list-style-type: none"> Agree with approach. Housing density should relate to facilities, infrastructure and character of the area. 	Noted	None
P1_0010_3_		No	Less houses	<ul style="list-style-type: none"> Less Houses 	Noted	None
P1_0010_7_		No	No, these kinds of building densities are much too high. They wouldn't allow for enough personal space, gardens etc.	<ul style="list-style-type: none"> Density is too high and would not allow for personal space 	Noted	None
P1_0010_8_		No	Too dense for the infrastructure	<ul style="list-style-type: none"> Infrastructure would not cope 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	None
P1_0011_0_CPRE Herts	CPRE Herts	Yes	Yes. We support PPO3 subject to additional guidance and criteria to optimise density in central and sustainably accessible built-up areas.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_0011_2_		No	Sorry if I'm being repetitive but I'll keep on saying this until someone with any common sense starts listening. No new development should take place in this area until we have a decent, more accessible hospital.	<ul style="list-style-type: none"> No new development until better hospital is provided. 	Noted. The CCG are responsible for providing healthcare and GP services and any planned provision will be included in the Infrastructure Delivery Plan.	None
P1_0011_3_		Yes	Balanced	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_0011_4_		Yes	Ensure housing density does not overwhelm the feeder roads and main road connections, in higher density areas ensure that public transport links provide viable alternatives to reduce driver only car journey.	<ul style="list-style-type: none"> Agree with approach but do not overwhelm feeder roads and main connections 	Noted	None
P1_0011_5_		No	The density appears high compared for example with the proposal for Killingdown farm, Croxley Green. However, the need for more affordable housing should be considered.	<ul style="list-style-type: none"> Densities appear higher especially with proposals at Croxley Green and Killingdown Farm; Need for more affordable housing needs to be considered 	Noted - Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	None
P1_0011_6_		Yes	Areas close to local amenities and transport links could support higher density housing as a way of encouraging reduced vehicular use but it should not be done to such an extent as to produce ghetto like area.	<ul style="list-style-type: none"> Areas close to local amenities/ transport could support higher densities 	Noted	None
P1_0011_9_		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_0012_1_		No	This area is too densely populated already. Traffic is appalling, parking is bad and already emissions are dangerously high	<ul style="list-style-type: none"> Area is already too densely populated and has negative impact on infrastructure. 	Noted	None
P1_0012_3_		Yes	Seems sensible and appropriate	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_0012_7_		No	Too many densely developed inappropriate sites without local amenity meaning essential car journeys and then not enough parking	<ul style="list-style-type: none"> Would lead to too many densely developed inappropriate sites without local amenity and not enough parking. 	Noted	None
P1_0013_0_		No	It isn't	<ul style="list-style-type: none"> Do not agree with approach but no alternatives suggested 	Noted	None
P1_0013_1_		No	As mentioned before - people now want more space. Flats and 'shoe box' houses with postage stamp gardens no longer cut it.	<ul style="list-style-type: none"> Too dense, people want more space 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0013_2_		Yes	again depends on infrastructure and bottle necks	<ul style="list-style-type: none"> Depends on how infrastructure is addressed 	Noted	None
P1_0013_3_		Not Stated	It would be appropriate to establish at least some zones where more dense development is to be directed. Denser brown field development will reduce green belt pressure and be more sustainable. Guidance please. Reference has been made to the Centre of Rickmansworth. The same argument might well apply to District, Local and neighbourhood Centres where flatted housing above retail will tend to be	<ul style="list-style-type: none"> Establish zones where more dense development is to be directed; Designate area near to border with other authorities and settled 	Noted	None

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			affordable and add (retail) vibrancy with reduced travel impact and less construction costs in £/m2. All hallmarks of sustainable development and living. From an urban planning perspective there may be merit in designating areas that are in close proximity to adjoining Planning Authority Areas and settling shared approaches that override administrative boundaries and are more reflective of community identity. Examples of this could be the Woodside area of Abbots Langley and the Gade Valley between the M25 and the rail bridges to the north.	approaches such as Woodside area of Abbots Langley and the Gade Valley		
P1_0013_5_		No	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas. Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links, access to nearby services and without damaging the character of the area.	<ul style="list-style-type: none"> Density is different than average density in settled areas. Should match existing densities unless it can be justified with good transport links. 	Noted	None
P1_0013_8_		Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_0014_0_		Yes	The manner in which the development would potentially proceed would need to adhere to strict regulations taking into account its environs.	<ul style="list-style-type: none"> Would need to adhere to strict regulations taking account of its environs. 	Noted	None
P1_0014_2_		No	don't build here on green belt land	<ul style="list-style-type: none"> Do not develop on 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_0014_4_		No	High-rise would prevent urban sprawl and in-filling tending to link Watford to Three Rivers and Hemel Hempstead	<ul style="list-style-type: none"> Do not agree with approach but high rise would prevent urban sprawl and infilling. 	Noted	None
P1_0014_7_		No	I think you need to encourage developers to specifically address global warming through their design proposals, and you should engage a specialist firm independently assess how well the design meets the climate change goals. Equally by being sympathetic to traditional character the council needs to encourage innovation in new building design to support home working, growth in electric and hydrogen powered transportation.	<ul style="list-style-type: none"> Need to ask developers to address global warming through design proposals and employ an independent firm to assess if this occurs; Need to encourage design to work from home 	Noted	None
P1_0014_8_		Yes	Development must not change the character of the area	<ul style="list-style-type: none"> Do not change the character of the area 	Noted	None
P1_0015_1_		Yes	If use of too much Green Belt land is to be avoided, higher densities will be needed. This will be most appropriate on smaller sites within already developed settlements.	<ul style="list-style-type: none"> Agree with approach as keeps use of Green Belt Land to a minimum 	Noted	None
P1_0015_4_Three Rivers Joint Residents Association	Three Rivers Joint Residents Association	Yes	21. Although the Associations agree with the principle, as outlined in paragraph 4.31, underlying the preferred policy on density, it is considered that the aims could be delivered by means of the other policies on design, as set out in Preferred Policy Option 6. The specification in paragraph 2 of Preferred Policy Option 3, of "at least 50 dwellings per hectare", is too prescriptive and is unlikely to be found sound at Examination. It is suggested that the bulk of the wording could be incorporated into the text, with appropriate cross-referencing to policies on place-making, design codes, and master-planning. For local areas, it is suggested that matters of density are best dealt with in the	<ul style="list-style-type: none"> Aims should be delivered by other policies on design; At least 50 dwellings per hectare is too prescriptive and not found sound at examination; For local areas, matters of density are best dealt within existing and emerging 	Noted	None

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			existing and emerging set of Neighbourhood Plans. Blanket policies for the District do not reflect varying characteristics.	Neighbourhood Plans. Blanket policies do not reflect varying characteristics.		
P1_0015_5_		Yes	My preference would be to maximize the use of the space, though my one comment would be that the amount of car parking space needed on most new estates is woefully underestimated and as everything is built in such close proximity all the roads end up cluttered with cars, which is unattractive and potentially hazardous. It would be good to see creative solutions to this issue and a consideration of what it is like to live in that space.	<ul style="list-style-type: none"> Maximise use of the space, amount of parking needed on new developments is woefully underestimated; Good to see creative solutions to the issue. 	Noted	None
P1_0016_2_		Yes	I agree than housing density should be considered and spaced out housing with ribbon development should be avoided	<ul style="list-style-type: none"> Agree with approach and ribbon development being avoided 	Noted	None
P1_0016_3_		Yes	For the reasons you give	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_0016_4_		Yes	No Time	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_0016_6_		Yes	I don't know	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_0016_8_		No	"densities generally of at least 50 dwellings per hectare" - fine in an urban context where high rise buildings are needed, but not appropriate in a rural context	<ul style="list-style-type: none"> 50dph not appropriate in rural location 	Noted	None
P1_0016_9_		No	Densities of at least 50 dwellings per hectare restricts outside space associated with a residence - decent outside space should be a requisite for development particularly within the greenbelt area - if we are to succumb to sacrificing our greenbelt asset.	<ul style="list-style-type: none"> Density is too high and would lead to a loss of amenity space 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0017_0_		No	Your example of Rickmansworth Town Centre, where residential densities are approximately 52 dwellings per hectare, are largely flats above shops, with no access to a private outside space.	<ul style="list-style-type: none"> Rickmansworth is not a good example with flats above shops and no private amenity space 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0017_4_		Yes	It is the right approach by preserving as much Green Belt as possible and concentrating human development in specific locations rather than allowing it to sprawl unchecked. However, high-density housing does come at the cost of quality of life ...	<ul style="list-style-type: none"> Agree with approach, but does affect quality of life 	Noted	None
P1_0018_1_Chiltern Society	Chiltern Society	Not Specified	50 dwellings per hectare is quite a high density to apply across the District. It may be appropriate on the more urban and brownfield sites, but is not likely to be appropriate in countryside areas. At this density, care will need to be taken in the design of the urban edge to reduce detrimental impacts on the wider landscape. The development of flats in the built-up areas would help to reduce the need to develop land in the Green Belt. Proposed densities of at least 50 houses per hectare are quite a jump from the current figure for Chorleywood at 18 houses/hectare. This will not retain the 'character and feel' for Chorleywood as expressed in the Neighbourhood Development Plan. There should be an enhanced role for Neighbourhood Development Plans in determining a density for their area. There is a need for land to contribute to nature recovery, Biodiversity Net Gain and Green Belt enhancement. This needs to be reflected in the density being 50dph in the built-up part of the development, but not averaged across the whole site.	<ul style="list-style-type: none"> 50 dwellings per hectare is not appropriate in countryside areas; Is currently a density of 18 dwellings per hectare in Chorleywood, 50 dwellings per hectare seems a big jump; Should be an enhanced role for Neighbourhood Plans in determining densities in the area; Land needs to contribute to nature recovery, Biodiversity Net Gain and Green Belt enhancement. Needs to be reflected in the density being 50dph 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0018_3_		No	NO new development should be instigated on any local sites that are areas of special historic or landscape value - farmland/open fields or woods	<ul style="list-style-type: none"> No new development should take place on areas of special historic or landscape value. 	Noted	None
P1_0018_4_		No	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas of Croxley Green. Housing density should reflect the density of the existing settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area. I question whether the minimum amenity space standards in Appendix 1 – Design Guide can be achieved with the proposed target of 50 dwellings per hectare. Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links and access to nearby services. It should also be about provision of appropriate outdoor space for each dwelling to enable people to have access to such space – as proved vital during pandemic lockdowns. Also to ensure appropriate provision for as much biodiversity and planting as possible, to help with carbon capture. Residents should also be incentivised to grow more of their own food, to help with sustainability and in some cases with their cost of living. Specific density targets should be set with no exceptions. Particularly without any transparent and measurable basis for which a higher density might be accepted. The pandemic has caused a significant shift in the amount of time people are spending / working from home and there is evidence that this will continue to be the case in future with businesses looking to reduce expensive office accommodation footprint. Lower density should be considered over historic statistics, given this shift.	<ul style="list-style-type: none"> Proposed target of 50 dwellings per hectare is different from average density in settled areas of Croxley Green; Housing density should reflect existing settlements unless public transport links are good; Need provision of outdoor space, especially due to outcomes during lockdowns; Incentivise residents to grow their own food; Need to take account change of pandemic and changes in behaviours and reduce office accommodation requirements as a result. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0018_6_		No	This is a highly densely populated area already where the infrastructure such as roads and water works already struggle to cope	<ul style="list-style-type: none"> Density is high already and infrastructure would not be able to cope 	DPH is indicative only and will be determined at the planning application stage. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	None
P1_0018_7_		No	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas of Croxley Green. Housing density should reflect the density of the existing	<ul style="list-style-type: none"> Proposed target of 50 dwellings per hectare is different from average 	DPH is indicative only and will be determined at the planning application stage.	None

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			<p>settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area. I question whether the minimum amenity space standards in Appendix 1 – Design Guide can be achieved with the proposed target of 50 dwellings per hectare. Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links and access to nearby services. It should also be about provision of appropriate outdoor space for each dwelling to enable people to have access to such space – as proved vital during pandemic lockdowns. Also to ensure appropriate provision for as much biodiversity and planting as possible, to help with carbon capture. Residents should also be incentivised to grow more of their own food, to help with sustainability and in some cases with their cost of living. Specific density targets should be set with no exceptions. Particularly without any transparent and measurable basis for which a higher density might be accepted. The pandemic has caused a significant shift in the amount of time people are spending / working from home and there is evidence that this will continue to be the case in future with businesses looking to reduce expensive office accommodation footprint. Lower density should be considered over historic statistics, given this shift.</p>	<p>density in settled areas of Croxley Green;</p> <ul style="list-style-type: none"> Housing density should reflect existing settlements unless public transport links are good; Need provision of outdoor space, especially due to outcomes during lockdowns; Incentivise residents to grow their own food; Need to take account change of pandemic and changes in behaviours and reduce office accommodation requirements as a result. 		
P1_0019_0_		No	That density is too high in some areas and there needs to be more flexibility	<ul style="list-style-type: none"> Density is too high and be more flexible in some areas 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0019_1_		No	A density of at least 50 dwellings/ ha is mission creep and not sustainable. 3R is a suburban/ rural district that should not support such dense population. One of the lessons of the pandemic is the risks of dense proximity of housing. It is also not at all clear how such a density could be supported with infrastructure. TRDC should seek a target of 30 dwellings/ ha on previously non developed land, and 40 on regenerated sites.	<ul style="list-style-type: none"> 50 dwellings per hectare is not sustainable; Density cannot support with infrastructure; Should be 30dph, 40dph on regenerated sites. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0020_1_		No	Consideration should be taken not to build high density housing in certain areas, especially Green belt land.	<ul style="list-style-type: none"> Do not build high rise in certain areas, in particular Green Belt 	Noted	None
P1_0020_6_		No	50 DPH is way too high. Other localities in and around London have 20-27 dph. It is obvious that Three Rivers wants to simply pack as many houses as they can into areas. There will be very little provision for Parking, pavements etc. Where are the facilities (parking spaces, garages etc) going to come from for these 50 houses per hectare? The average household in the UK has 1.88 cars, this is higher in the south. Where are 200 cars per hectare going to be put?	<ul style="list-style-type: none"> 50dph is too high; Where are 200 cars per hectare going to go? 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0020_9_		No	The suggested densities are far too high for the areas under consideration, even before the arguments that you should not be trying to develop green belt land in the first instance. There is insufficient infrastructure in terms of road, public transport, amenities (recreational facilities some of which will actively be removed by these proposals, doctors, shops etc), water and waste sewerage, flooding risks. The list is almost endless	<ul style="list-style-type: none"> Densities are too high for the areas under consideration; Should not be developing Green Belt Land in the first instance; Infrastructure is insufficient. 	Noted	None
P1_0021_1_		Yes	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas. Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links, access to nearby services and without damaging the character of the area. In addition requirements for residential amenity space must be defined.	<ul style="list-style-type: none"> Proposed target of 50dph is much higher than existing densities; Higher densities can be provided when near public transport links; 	Noted	None
P1_0021_3_		No	High density housing is undesirable full stop. This are should concentrate on green space per head	<ul style="list-style-type: none"> No high density development 	Noted	None
P1_0021_8_		Yes	Yes, of course, in general, high-density housing makes sense to preserve the green belt. However, this sometimes then creates zones with very little green space, social amenities, or community connection. If TRDC are going to work towards 50 dwellings per hectare, and the centre of Rickmansworth is 52 dwellings per hectare, then that is very different to the existing character of the district. Most of the district is not at all like the commuter flats and quantity of retirement units found in Rickmansworth Town Centre. If the local plan was serious about delivering housing at these densities, then we wouldn't need so many sites, and very, very few of them would be family homes of 3 and 4 bedrooms. It seems like a sensible policy option, but doesn't seem feasible considering the rest of the plan and the environmental quality of the district as it currently is. Acknowledging that the average density proposed for the sites in Abbots is 35 dwellings per hectare.	<ul style="list-style-type: none"> High density makes sense to preserve Green Belt; Concerns regarding amenity space with high density; If local plan wants to propose the density not be as many sites and have no 3-4 bed houses; Acknowledge that average density in Abbots is 35dph 	Noted	None
P1_0021_9_		No	To increase the housing density to "at least 50 per hectare" will destroy the character of the environment that people seek when moving to the area. This will inevitably decrease the price of houses in the area as its nature will be changed irreversibly.	<ul style="list-style-type: none"> High density will destroy the character of the area 	Noted	None
P1_0022_0_Moor Park Residents Association	Moor Park Residents Association	Not stated	1. Although the Associations agree with the principle, as outlined in paragraph 4.31, underlying the preferred policy on density, it is considered that the aims could be delivered by means of the other policies on design, as set out in Preferred Policy Option 6. The specification in paragraph 2 of Preferred Policy Option 3, of "at least 50 dwellings per hectare", is too prescriptive and is unlikely to be found sound at Examination. It is suggested that the bulk of the wording could be incorporated into the text, with appropriate cross-referencing to policies on place-making, design codes, and master-planning. For local areas, it is suggested that matters of density are best dealt with in the existing and emerging set of Neighbourhood Plans. Blanket policies for the District do not reflect varying characteristics.	<ul style="list-style-type: none"> Aims should be delivered by other policies on design; At least 50 dwellings per hectare is too prescriptive and not found sound at examination; For local areas, matters of density are best dealt within existing and emerging Neighbourhood Plans. Blanket policies do not reflect varying characteristics. 	Noted	None

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P1_0022 2_Three Rivers Green Party	Three Rivers Green Party	No	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas. Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links, access to nearby services and without damaging the character of the area. To achieve good design at higher densities, requirements for residential amenity space must be defined.	<ul style="list-style-type: none"> Proposed density of 50dph 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0022 3_		Yes	As long as it is 50 dwellings per hectare, we do not want cramped housing.	<ul style="list-style-type: none"> Agree with approach as long as density is no higher 	Noted	None
P1_0022 4_		No	No... we all know what happens when this is a target above the good of the community living there. It is the wrong way to do things.	<ul style="list-style-type: none"> It's the wrong way to do things. 	Noted	None
P1_0022 7_		No	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas of Three Rivers. Housing density should reflect the density of the existing settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area. Can the minimum amenity space standards in Appendix 1 'Design Guide be achieved with the proposed target of 50 dwellings per hectare?'	<ul style="list-style-type: none"> Target is different from average density in settled areas of Three Rivers; Density should reflect higher density without damaging the character of the area. 	Noted	None
P1_0023 0_		Not Stated	1. "at least 50 dwellings per hectare." is too prescriptive for the different characteristics of sites and areas across the District.	<ul style="list-style-type: none"> 50 dwellings per hectare is too prescriptive for characteristics of sites and areas across the district. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0023 2_		No	The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas. Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links, access to nearby services and without damaging the character of the area. To achieve good design at higher densities, requirements for residential amenity space must be defined.	<ul style="list-style-type: none"> Proposed target is significantly different from average density in settled areas; To achieve good design at higher densities, requirements for residential amenity space must be defined. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0023 3_		No	I completely disagree that Preferred Policy Option for Housing Density is the right approach? 50 dwellings per hectare is far too high. This, as stated in point 4.33, is the average for town centres such as Rickmansworth. We in Carpenders park and South Oxhey are not town centres, nor do we want to be considered as such! This target is too high and should be significantly lowered. You should also re consider point 4.37. I feel this is the wring approach. If anything, you should be asking for evidence and reason for any application which causes the density to go ABOVE the agreed dwellings per hectare not below!	<ul style="list-style-type: none"> 50dph target is far too high, only density for centres not the rest of the district; Target is too high and should be significantly lowered; Need evidence why applications go above rather than below agreed dph. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0023 4_		Yes	I completely disagree that Preferred Policy Option for Housing Density is the right approach? 50 dwellings per hectare is far too high. This, as stated in point 4.33, is the average for town centres such as Rickmansworth. We in Carpenders park and South Oxhey are not town centres, nor do we want to be considered as such! This target is too high and should be significantly lowered. You should also re consider point 4.37. I feel this is the wring approach. If anything, you should be asking for evidence and reason for any application which causes the density to go ABOVE the agreed dwellings per hectare not below!	<ul style="list-style-type: none"> 50dph target is far too high, only density for centres not the rest of the district; Target is too high and should be significantly lowered; Need evidence why applications go above rather than below agreed dph. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0023 5_		No	we should resist further development	<ul style="list-style-type: none"> No more development 	Noted	None
P1_0023 6_		No	I believe this is too high a minimum to preserve the character of some parts of the district	<ul style="list-style-type: none"> Density too high to preserve character of some parts of the district. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0023 8_		No	The Council's proposed housing density refers to at least 50 dwellings per hectare generally being required. Whilst such densities will be appropriate in some locations within the District, to apply such a figure as a district wide requirement is unrealistic and ignores the locations and context of the site allocations.	<ul style="list-style-type: none"> 50dph is applicable in some but not all of the district; 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0024 0_		No	What about the impact on local services? Surely there should be some addition of 'for every x number of homes, x number of will be funded, x number if school places added etc etc. There is huge disconnect with district councils agreeing planning policies but it's the county council that govern education and healthcare.	<ul style="list-style-type: none"> Will have an impact on local services; Should be an addition for x number of homes, will be x funding and x number of places added. 	Noted	None
P1_0024 4_		Yes	High density is the only way to protect sprawl into the remaining Green Belt.	<ul style="list-style-type: none"> Agree with Approach 	Noted	None
P1_0025 6_		No	Housing density is just about acceptable for houses, but recent flats developments neighbouring the borough are far too dense	<ul style="list-style-type: none"> Housing density is acceptable for houses, but not for flats. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0025 9_		No	The number of houses proposed makes no sense if the level of the existing services and infrastructure have been taken into account. they just simply seem too high	<ul style="list-style-type: none"> Number of houses is too high for services and infrastructure. 	Noted	None
P1_0026 1_		No	Rubbish approach that has no regard to housing quality and where standards should apply. This should be back by viability.	<ul style="list-style-type: none"> Approach has no regard to housing quality and where standards should apply. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0026 2_		No	Do not believe this area is well served by public transport. PT should be improved to support higher density and reduce need for cars	<ul style="list-style-type: none"> Areas not served by public transport 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0026 5_		Yes	The measurement is rather general (50 dwellings /HA). Whilst this may be appropriate in some areas it is unlikely to be a sensible general number. The council in developing this report should have looked at providing different densities to cover different areas / environments. A 50/HA number in a dense urban area which has established infrastructure and existing density of around	<ul style="list-style-type: none"> Whilst 50dph is appropriate in some areas, unlikely to be a sensible general number; 	DPH is indicative only and will be determined at the planning application stage.	None

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			this number could work. To allow construction of this level of density in a unsupported area where there is a far lower density would significantly and detrimentally impact the environment and the conditions of existing residents – e.g. to take an extreme example it would be inappropriate if you were to have an area with 10 dwellings/HA and remove 2 and build on this land 42 dwellings you can see how this would then meet the 50/HA goal but substantially change the environment for the remaining original 8 dwellings.	<ul style="list-style-type: none"> Whilst higher density maybe acceptable in urban areas with transport links, not applicable in other areas of the borough. 		
P1_0026_7_			Actually I'm not sure whether this is the right approach, but it seems reasonable.	<ul style="list-style-type: none"> General agreement with approach 	Noted	None
P1_0026_8_		No	The proposed target of 50 dwellings per hectare is unacceptably dense and far different to the average density in the settled areas of Croxley Green.	<ul style="list-style-type: none"> Average density is too high, especially in areas such as Croxley Green. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0027_1_		No	Section (2) Too many dwellings will be squeezed into developments, not enough consideration given to quality of life for occupants. Need to consider traffic and parking requirement levels too, so 50 dwellings per hectare should be reduced.	<ul style="list-style-type: none"> Density is too high and will have an unacceptable impact on quality of life for occupants, consider traffic and parking requirements. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_0028_1_		Yes	No faith again though	<ul style="list-style-type: none"> Agree with approach but concerns won't be implemented 	Noted	None
P1_0028_2_		Yes	It is a reasonable approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None

Q3. Should we have considered alternative options?

SC_00027_TFL Commercial Development			TFL support the Council's aspiration for seeking to optimise density on sites. This is vital to make the most efficient use of land in line with the NPPF. Paragraph 11 of the NPPF notes that all plans should promote a sustainable pattern of development that seeks to mitigate climate change (including by making effective use of land in urban areas) and Chapter 11 of the NPPF also goes into detail on making effective use of land. This will help minimise the need to develop on Green Belt sites. The expectation for sites in areas well served by public transport, services and facilities to have higher densities is also supported.	<ul style="list-style-type: none"> Support the Policy. 	Noted	No action
P1_00005_		Yes	Give examples of acceptable layouts	<ul style="list-style-type: none"> Noted 	Noted	None
P1_00014_		Yes	Answer as per previous similar question.	<ul style="list-style-type: none"> Bare minimum standard, don't need more housing due to number of empty buildings in the area 	Noted	None
P1_00017_		Yes	You should plan the developments and subcontract the build	<ul style="list-style-type: none"> TRDC should plan the developments and subcontract the build. 	Noted	None
P1_00023_		Yes	See comment above	<ul style="list-style-type: none"> Due to Covid behaviours, current density of 50dph should be lowered 	Noted	None
P1_00025_		Yes	Reduced number of housing	<ul style="list-style-type: none"> Reduce number of housing 	Noted	None
P1_00040_		Yes	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> Do not develop Green Belt Land 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability	None

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					considerations, have been taken into account when identifying which potential areas of Green Belt Land to release”.	
P1_00_041_	Yes	Yes, but do not know what that might be. Would be good to know about alternatives so that you can be confident that the chosen approach is correct.	<ul style="list-style-type: none"> Need to consider alternatives so you know the approach chosen is the correct one. 	Noted	None	
P1_00_045_	Yes	Policy on the building of multiple houses on the sites of demolished single properties should be spelt out. It may be appropriate if it significant increases the existing stock but generally is detrimental to the character of the district.	<ul style="list-style-type: none"> Policy of intensifying single property sites should be 'split out', appropriate if increases general stock but not if detrimental to character of the area. 	Noted	None	
P1_00_048_	Yes	See above	<ul style="list-style-type: none"> Lower densities more sustainable long term; High density with no parking cause issues in surrounding area; Need to respect the character 	DPH is indicative only and will be determined at the planning application stage.	None	
P1_00_049_	Yes	More social housing or converting offices to housing.	<ul style="list-style-type: none"> More social housing or converting office to housing 	Noted	None	
P1_00_053_	Yes	No thoughts or plans for surrounding roads etc has been published as part of the plan (especially in regards to Toms Lane) which will result in huge amount of traffic and congestion.	<ul style="list-style-type: none"> No plans published for surrounding roads as part of the plan, especially regarding Tom's Lane. 	Noted	None	
P1_00_055_	Yes	Strongly oppose the unrealistic targets set	<ul style="list-style-type: none"> Oppose the housing target 	Noted	None	
P1_00_056_	Yes	Density calculations should be based on existing rates in much more locally defined areas.	<ul style="list-style-type: none"> Density calculations should be based on existing rates in local areas not at the district level. 	Noted	None	
P1_00_057_	Yes	Consider areas that are not prone to flooding, or already have over crowded roads, school, and parking.	<ul style="list-style-type: none"> Considers areas not prone to flooding, strained infrastructure or parking. 	Noted	None	
P1_00_063_	Yes	As above	<ul style="list-style-type: none"> Can reduce density by limiting kind of development (i.e. starter homes and homes for elderly) 	Noted	None	
P1_00_064_	Yes	COV-id has proven that office work can be done remotely. This means it is not necessary to have higher density housing near transport hubs, houses/flat complexes can be built in more remote settings	<ul style="list-style-type: none"> Do not need higher density housing neat transport hubs due to COVID and people working from home. 	Noted	None	
P1_00_066_	Yes	As above.	<ul style="list-style-type: none"> No justification for 50dph, will have unacceptable impact on infrastructure; Should be 10dph. 	DPH is indicative only and will be determined at the planning application stage.	None	
P1_00_068_	Yes	"Development should make the most efficient use of land, without compromising the quality of the environment or existing residential areas" This statement is full of evil portent! The most efficient use of land for housing would be to stack them on top of one another! Even 25 to the acre is bad enough. The Environment - if a greenfield site - will be ruined forever, the only placatory factor that could be worked in is that the new won't offend the existing residents - good luck with that one!	<ul style="list-style-type: none"> Density is too high, will ruin the Environment 	DPH is indicative only and will be determined at the planning application stage.	None	
P1_00_071_	Yes	See answer above.	<ul style="list-style-type: none"> Needs to withdraw local plan and replace with a plan for lower figures 	Noted	None	
P1_00_076_	Yes	I think it is vital to consider primarily the quality of housing stock being built rather than squeezing in as many homes as possible to an area which will. I have lived in cramped housing conditions and know how this can negatively impact health and wellbeing. Rather than squeezing homes into land where it will be mean a high turnover of tenancies, insecure communities, and poor quality, homes should be built to support communities. New towns, and higher taxes on second home owners and large property owners. If this is implemented across the south east the housing stock situation would be completely transformed and the greenbelt would be preserved.	<ul style="list-style-type: none"> Quality of homes is more important than density; High density will impact mental health; Need new towns and higher taxes on second home owners and large property owners to free up property; 	DPH is indicative only and will be determined at the planning application stage.	None	
P1_00_080_	Yes	Do not build on green belt land	<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	None	

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					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_00 088_		Yes	I would expect to see comments which include the need for green space, that includes space around existing trees,	<ul style="list-style-type: none"> Need to include the need for green space, that includes space around existing trees, 	Noted	None
P1_00 096_		Yes	Housing density should be consistent with older properties in the area	<ul style="list-style-type: none"> Housing density should be consistent with older properties 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 098_		Yes	Consider greener and more characterful housing.	<ul style="list-style-type: none"> Greener and more characterful housing 	Noted	None
P1_00 099_		Yes	Greener, more open and peaceful development should be considered.	<ul style="list-style-type: none"> Greener and more characterful housing 	Noted	None
P1_00 103_		No	Less houses to preserve the historic characteristics of the village	<ul style="list-style-type: none"> Less housing 	Noted	None
P1_00 107_		No	Keeping to densities similar to existing developments.	<ul style="list-style-type: none"> Keep densities matched with existing 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 108_		Yes	Less densely populated development	<ul style="list-style-type: none"> Less densely populated areas 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 112_		No	No way should any new houses be built on green belt land. Brownfield and other non-green belt sites should always be investigated first. Houses should be built in areas where the infrastructure can cope. It can't cope in this area.	<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_00 113_		Yes	Balance	<ul style="list-style-type: none"> Balance 	Noted	None
P1_00 119_		Yes	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Land is sanctuary for wildlife 		None

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P1_00 121_	Yes	No Comment	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 127_	Yes	Less dense options with adequate parking for families	<ul style="list-style-type: none"> Lower density 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 131_	Yes	See above	<ul style="list-style-type: none"> Too dense, people want more space 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 132_	Yes	depends on models of transport pattern and facilities	<ul style="list-style-type: none"> Depends on model of transport pattern and facilities. 	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_00 135_	No	To achieve good design at higher densities, requirements for residential amenity space must be given much more thought and consideration	<ul style="list-style-type: none"> Requirements for residential amenity space must be given much more thought and consideration. 	Noted	None
P1_00 138_	Yes	No Comment	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 142_	Yes	Somewhere not green belt land.. it's so simple and obvious why are we having this question!?	<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	Higher density is possible with moderate high rise buildings and mandatory shared green spaces adjacent	<ul style="list-style-type: none"> High density is achievable with moderate high rise and mandatory shared green spaces adjacent. 	Noted	None
P1_00 147_	Yes	The council would be wise to sit down with the likes of RIBA to establish a longer term vision for how housing design would evolve to both embrace the existing landscape while at the same time develop homes that meet the needs of local people and businesses	<ul style="list-style-type: none"> Sit down for RIBA to establish longer term vision for how housing design will embrace landscape. 	Noted	None
P1_00 163_	Yes	To reach the right decision	<ul style="list-style-type: none"> Reach the right decision 	Noted	None
P1_00 164_	Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None

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P1_00 168_	Yes	There should be much greater recognition of the significant differences in density that are appropriate for (i) urban settings e.g. South Oxhey and (ii) rural locations in the Three Rivers area. A policy of "densities generally of at least 50 dwellings per hectare" makes no sense for sensible development in rural areas.	<ul style="list-style-type: none"> Should be a recognition of differences in density in urban setting and rural locations, 50 dwellings makes no sense for sensible development in rural areas. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 170_	Yes	Post-Lockdown people trapped in high-density housing developments with little or no access to any outside space, have reportedly fared less well in terms of their mental health than those of us fortunate enough to have access to a private garden. This new factor/information should have been taken into account when developing this plan. Guideline densities of a minimum of 50 dwellings per hectare should not be set for the District, as all of Chorleywood needs car-parking spaces. With higher densities expected from areas well served by public transport, services and facilities. Chorleywood only has a good tube/train service into Central London, hence it is a favoured location for commuters. There is no direct tube service to Watford, even though there is a line in existence, and even the change at Moor Park option ends in a housing estate and not in the town centre. There are virtually no transport links to the rest of the facilities provided by TRDC. As an example how does one get from Chorleywood to the William Penn Leisure Centre without a car?	<ul style="list-style-type: none"> People in high density developments fare less in terms of mental health; 50dph should not be set for the whole district. Chorleywood need parking spaces and no links to community infrastructure such as William Penn Leisure Centre; Higher densities around public transport links; 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 183_	Yes	As above	<ul style="list-style-type: none"> No new development should take place on areas of special historic or landscape value. 	Noted	None
P1_00 186_	Yes	This site should not be developed at all due to the damage on the current infrastructure and environment	<ul style="list-style-type: none"> Should not be developed at all due to damage to environment and infrastructure; 	Noted. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	None
P1_00 190_	Yes	No set limit of 50 homes but a general discretion	<ul style="list-style-type: none"> Should be no set limit on 50dph, but a general discretion. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 191_	Yes	As above, as part of a strategy to further challenge the Standard Method calculations	<ul style="list-style-type: none"> Should be part of a strategy to further challenge the standard methodology; 	Noted	None
P1_00 201_	Yes	Throwing up lots of houses, especially in more rural areas, is off putting and should be avoided.	<ul style="list-style-type: none"> Throwing up lots of houses should not be allowed in rural areas. 	Noted	None
P1_00 206_	Yes	A highly reduced DPH	<ul style="list-style-type: none"> Lower dph needed 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 209_	Yes	It is for councillors to suggest sensibly considered, alternative options	<ul style="list-style-type: none"> For councillors to consider alternative options. 	Noted	None
P1_00 213_	Yes	See above	<ul style="list-style-type: none"> No high density development 	Policy on internal and external amenity space standards included in the Local Plan.	None
P1_00 219_	Yes	As above	<ul style="list-style-type: none"> High density will destroy the character of the area. 	Policy on internal and external amenity space standards included in the Local Plan.	None
P1_00 224_	Yes	all above on previous answers... brownfield sites etc	<ul style="list-style-type: none"> It's the wrong way to do things. 	Noted	None
P1_00 227_	Yes	Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links and access to nearby services. It should also be about provision of appropriate outdoor space for each dwelling to enable people to have access to such space as proved vital during pandemic lockdowns. The pandemic has caused a significant shift in the amount of time people are spending at home and working from home and there is evidence that this will continue to be the case in future with businesses looking to reduce expensive office accommodation footprint.	<ul style="list-style-type: none"> Density targets should match patterns in existing settlements; High densities justified with good public transport links and access to services; Pandemic has caused change in patterns which should be taken into account 	Policy on internal and external amenity space standards included in the Local Plan.	None
P1_00 235_	Yes	Less development. Already other close areas are having increased housing and it is causing problems	<ul style="list-style-type: none"> Less development, other close areas are having increased housing which is causing problems 	Noted	None
P1_00 236_	Yes	As above _A lower minimum	<ul style="list-style-type: none"> Lower minimum dph needed 	DPH is indicative only and will be determined at the planning application stage.	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	See above	<ul style="list-style-type: none"> Will have an impact on local services; Should be an addition for x number of homes, will be x funding and x number of places added. 	Noted. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	None
P1_00 244_	Yes	Higher density than the figure quoted in sites where this is possible.	<ul style="list-style-type: none"> Have a higher density than figure quoted where possible. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 256_	Yes	Plan based on what an acceptable dwelling is, then see how many fit, and not the other way around. 2, 3, 4 bedroom houses are required for a occupants wellbeing. There are already more than enough flats.	<ul style="list-style-type: none"> Plan for what an acceptable dwelling is then see how many fit, not other way around; Already too many flats. 	Noted	None

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P1_00 261_		Yes	Different densities at different locations. Moor Park for instance could have increased density whilst Bedmond could have a lower density. Density should be driven by quality and beauty.	<ul style="list-style-type: none"> Different densities in different locations, for example Moor Park have higher density, Bermond to have lower. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 262_		Yes	improve infrastructure so that existing residents don't resent sharing meagre services with potential new residents	<ul style="list-style-type: none"> Need to improve infrastructure first 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	None
P1_00 265_		Yes	The measurement is rather general (50 dwellings /HA). Whilst this may be appropriate in some areas it is unlikely to be a sensible general number. The council in developing this report should have looked at providing different densities to cover different areas / environments. A 50/HA number in a dense urban area which has established infrastructure and existing density of around this number could work. To allow construction of this level of density in a unsupported area where there is a far lower density would significantly and detrimentally impact the environment and the conditions of existing residents - e.g. to take an extreme example it would be inappropriate if you were to have an area with 10 dwellings/HA and remove 2 and build on this land 42 dwellings you can see how this would then meet the 50/HA goal but substantially change the environment for the remaining original 8 dwellings. Use a range of densities targets dependant on the identified area.	<ul style="list-style-type: none"> Measurement is rather general; Maybe appropriate in some areas, unlikely to be a sensible elsewhere; 50Ha would work in dense urban areas with appropriate infrastructure, not in other areas; Not appropriate to intensify in low density areas, where infrastructure supports the low but not high density. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 268_		Yes	The density targets should give much greater consideration to provision of outdoor space. This is vital for a number of reasons, not limited to 1) access to such space has proved vital for the physical and mental health of people during pandemic lockdowns; 2) to ensure provision for as much biodiversity and planting as possible, to help with Carbon capture; 3) as well as providing a suitable amount of outdoor space when calculating density targets, the council should incentivise people to grow more of their own food, to help with sustainability and in some cases their cost of living; 4) specific density targets should be set , with no exceptions, regardless of what commercial limits the site in question may have; 5) the rise in people working from home and evidence that this will continue, with companies looking to reduce expensive office accommodation footprint means people will rely on having a reasonable amount of space at their homes instead.	<ul style="list-style-type: none"> Density target should consider need for outdoor space, as essential during pandemic, ensures as much biodiversity as possible, suitable amount of outdoor space as possible; Council should incentivise people to grow their own food which helps sustainably and cost of living; Specific densities should be set with no exceptions, regardless of commercial limits of site in question; Pandemic reduced need for office space and people will rely on reasonable amount of space in their homes. 	DPH is indicative only and will be determined at the planning application stage.	None
P1_00 271_		Yes	As above	<ul style="list-style-type: none"> Density is too high and will have an unacceptable impact on quality of life for occupants, consider traffic and parking requirements. 	DPH is indicative only and will be determined at the planning application stage.	None