NON-STATUTORY CONSULTEES

REPRESENTATION REFERENCE	REPRESENTOR	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
GEN		IMENTS			
P1_00 184_		I have concerns about three aspects of the proposed local plan STRATEGIC CONSIDERATIONS There is no overarching vision for the sustainable development of the district and the various settlements within it. The Local Plan seems to be a collection of ad hoc responses to the various development pressures on the district rather than a strategic vision for sustainable development to meet the needs of the communities which make up Three Rivers. Wo particular examples: □ Proposals for the development or redevelopment of town and other local centres (such as Croxley Green) to meet the evolving needs of the community as the population grows □ Proposals for development to meet the health, social and educational needs of the communities over the next 30 years, in particular the health facilities in Croxley Green ENVIRONMENTAL CONSIDERATIONS The UN recent IPCC report on climate change has made the issue even more important. The Local Plan should reflect the scale of these problems and the changes needed to meet the targets and protect the planet, humanity, and the natural resources upon which we all ultimately depend. Although there are many fine words within the proposed policies there seems to be an almost total lack of objective targets. Without targets to be achieved there will be little incentive for developers to make progress where there may be additional costs. HOUSING MARKET TRDC are right to object to the Governments housing targets, but do not go far enough. It's not entirely clear from the consultation documents what the Council's alternative methodology is for this new figure. CPRE Hertfordshire has already publised an initial assessment stating TRDC is accounting for an overprovision of housing due to the projections being out of date. The latest projections show a decrease in new households and therefore a reduced number of houses which should be planned for. The Council has failed to take account of local planning authorities' ability to challenge the Government's calculation for housing numbers and to res	 STRATEGIC CONSIDERATIONS No vision for sustainable development; Local Plan seems to be a collection of ad hoc responses to the various development pressures on the district rather than a strategic vision; ENVIRONMENTAL CONSIDERATIONS UN recent IPCC report on climate change has made the issue even more important; Total lack of objective targets; HOUSING MARKET Not clear from the consultation document what the methodology for new figure; Council has failed to take account of local planning authorities' ability to challenge the Government's calculation for housing numbers; AFFORDABLE HOUSING Need for affordable housing equivalent to 60% of the District's total housing requirement. However, preferred policy option states all new development with a net gain of one or more dwellings will be expected to provide only 40% for affordable housing target should at <i>least</i> meet the identified need and be backed up by strong policies 	STRATEGIC CONSIDERATIONS Noted. ENVIRONMENTAL CONSIDERATIONS Noted. Numerous references are made to Climate Change in the document and how the Council seeks to address climate change. HOUSING MARKET Methodology is explained in accompanying evidence base and AFFORDABLE HOUSING	Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial vision for individual areas will be revisited following the analysis of the growth options and preferred spatial strategies, which is the subject of the next Regulation 18 stage of the Local Plan (Sep-Oct 2023).
P1_00 230_		There is no question regarding the Vision which is fundamental to the whole Local Plan. This needs to include our Green Belt and Climate Change. The Council also needs to include lessons learnt from the COVID Pandemic. There is no question about the consultation itself. There should be some means of providing feedback which the Council needs to inform future consultations.	 Vision needs to include the Green Belt and Climate Change; Needs to be means of providing feedback which Council needs to inform 	Noted	Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial vision for individual

		presentations – vision & otrategic objectives		
P1_00 257_E & J Eustac e		We would like to re-iterate and endorse the Three Rivers Green Party response.	Endorse Three Rivers Green Party Response	Noted
P1_00 264_M aple Cross and West Hyde RA	Maple Cross and West Hyde RA	We found the 'Vision' for Three Rivers District to be most disappointing. In a time of Climate Emergency – declared 2019 – we also have an Ecological Emergency so we wanted an inspirational vision, something that communities could enthusiastically get behind. Accordingly we feel it is a missed opportunity. For Maple Cross the removal of a further 67 hectares of food producing farm land will do the opposite of creating a great place to live and work (paraphrased). So we suggest an inspirational rethink.	 Need the vision to make reference to an Ecological Emergency; Suggest and inspirational rethink of the vision. 	Noted
P1_00 266_		 I am underwhelmed by the contents of the Preferred Policies, it has taken so many years to produce this and yet Climate Change, the most important problem to address with the exception of the Ecological Emergency, is just about as unambitious as possible. Not enough specific references to the Climate Emergency and Sustainability Strategy and a real lack of measurables. 2.1 The SW Herts Economic Study of 2019 is, post pandemic and post Brexit, out of date. Here in Maple Cross Skanska are leaving at the end of the year to move to Leavesden as the office is now too large for their needs. Many offices throughout the District will experience the same or similar problems. It will now be inaccurate to state that '55% of jobs in offices' as many are working from home. 2.12 'It will be important in the future to provide a balanced of new homes and jobs to try and address commuting levels'. Yet this local plan is definitely not geared to making any real change to commuting levels during its lifespan. 2.15 'Securing increased business investment' Where is this plan? Are the goals measurable? 'Development will be focused well served by public transport'. So why is such large scale development proposed for Maple Cross? 11 No mention of the Colne Valley Regional Park which must be included Preferred Policy Option 1: Admirable words but without clarification many are absolutely meaningless, examples below. There are no measurables to show how goals are to be achieved or a time frame, a serious flaw in this Policy. () How can you prioritise development on brownfield land since it is a more expensive option than building on Green Belt. () How can you prioritise development on brownfield land since it is a more expensive option than building on Green Belt. () How can you prioritise development on brownfield land since it is a more expensive option than building on Green Belt. 	 Vision is very unambitious in regards to Climate Change; SW Herts Economic Study post-pandemic and post-Brexit is out of date e.g. stating 55% of jobs in offices' is inaccurate due to working from home; Local Plan is not making any real change to commuting levels during its lifespan; Plan states 'securing business goals' but no reference to this in the plan; Plan states that 'Development will be focused, well served by public transport', so why such a large development proposed for Maple Cross; Must include reference to Colne Valley Regional Park; Preferred Policy Option 1 Respect wording but without clarification are absolutely meaningless; Query how prioritise development on Brownfield land since more expensive than building on Green Belt; What are the parameters for increasing density within each part of the District? In regards to playgrounds being part of Green Infrastructure, most playgrounds are fenced off and cannot be included within Green Infrastructure; Post Pandemic – Offices with large floor plates, needs to be updated in light of 	

areas will be revisited following the analysis of the growth options and preferred spatial strategies, which is the subject of the next Regulation 18 stage of the Local Plan (Sep-Oct 2023). Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial vision for individual areas will be revisited following the analysis of the growth options and preferred spatial strategies, which is the subject of the next Regulation 18 stage of the Local Plan (Sep-Oct 2023). The change in wording for Paragraph 7.15. Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial strategics, which is the subject of the next Regulation 18 stage of the Local Plan (Sep-Oct 2023).	
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 4.8 Many of the proposed sites in the local plan contravene this paragraph, so how can this paragraph remain in place? 5.6 - 5.8 Post pandemic – offices with large floor plates The Economic Study needs to be updated to learn how we move on post pandemic 5.8 18,000 sq m industrial/warehousingMaple Cross (Site E(d). This needs to be removed from the local plan it is a non viable option. TRDC cannot permit warehousing on this site for many reasons which include the objectives of the WFD. 7.3 Ground source pumps are far more efficient than ambient air heat pumps in the UK climate. Therefore this should be the preferred option for larger development sthat are not within GSP21. 7.15 major non-residential and multi residential development proposals to aim to achieve a minimum BREEAM Standard of Excellent. 7.36 A DRQA must accompany a planning application for any major development within a GSP21 Our water is a resource that will become even more precious due to climate change, we must not allow it to be compromised by development for the sake of future generations. Sites that are not subject to SP21 classifications should be given a higher priority for development. 7.37 ' where it is likely that a proposal would have a significant adverse impact on water quality' Then a DQRA must be submitted with the developers application. 11.18 It is essential that applicants engage with the local community at an early stage

	DRY CONSULTEES			1		
SC_000 23_Cro xley Green Parish Council	Croxley Green Parish Council	YES	 Croxley Green Parish Council has concerns about three aspects of the Preferred Policy Options in the proposed Local Plan: Strategic Considerations. The proposed policies and site allocations provide a useful framework for many aspects of development control. However, there is no overarching vision for the sustainable development of the district and the various settlements within it. The Local Plan seems to be a collection of ad hoc responses to the various development of the needs of the communities which make up Three Rivers. Two particular examples: Proposals for the development or redevelopment of town and other local centres (such as Croxley Green) to meet the evolving needs of the community as the population grows Proposals for development to meet the health, social and educational needs of the communities over the next 30 years Environmental Considerations. The UN has identified three separate global crises facing humanity: Climate change · Species extinction · Waste disposal. The UK Government has set itself challenging targets. The Local Plan should reflect the scale of these problems and the changes needed to meet the targets and protect the planet, humanity, and the natural resources upon which we all utilimately depend. Although there are many fine words within the proposed policies there seems to be an almost total lack of objective targets. Without targets to be achieved there will be little incentive for developers to make progress where there may be additional costs. Housing Market. There are two fundamental problems within the UK housing market. The demand for housing is a totally free market but the supply of land for housing is regulated through planing controls. Therefore the price of land (and of the buildings on it) reflects the scarcity of land for building in the places where people wish to live. There are two different reasons for buying property. Some want to buy it for investment, others because they need som	•	No overarching vision for sustainable development of the district and the various settlements within it. The lack of targets for climate change, waste, ect No evidence has been presented that releasing more land for house building locally would change the relationship between local incomes and the local cost of housing in a way that meets the housing needs of the whole population.	Noted. The strategic updated to better re those issues of signi to help inform the C to sustainable develor meeting its commitre climate change eme Noted. The lack of ta Noted. The Councils more detailed look a and the relationship incomes and local he and it is this evidence inform the housing p
SC_000 24- Abbots Langley Parish Council	Abbots Langley Parish Council	Yes	I feel that the Government required figures were unadoptable within an area which has so much REQUIRED greenbelt under NPPF, the reduced planning proposed numbers are still too high (see previous dialogue) and they are also dated as they do not take into account the results of BREXIT, Covid and the redistribution of workers away from London. So YES, we do agree with not complying	•	Housing need figure still too high and does not take account of Green belt, Covid and Brexit.	Noted. The Governmethodology is based trends. The Coronav considered to be a s and will not affect or rates. In regards to no clear evidence of this has on the popu The Council will cont any changes to the standard methodolo Annual Monitoring R subsequent implicat Rivers Local Plan.
SC_000 26_HC C Growth and Infrastr ucture	HCC Growth and Infrastructure	Suppor t	It is noted that the housing target for the local plan is 12,624 dwellings during the period 2018- 2038, although this is reduced to 10,678 dwellings when taking into account completions between 2018-2020 (608 dwellings), commitments (948 dwellings) and a windfall allowance of 390. 8,973 dwellings will be delivered on the potential housing allocations that are identified in part 2 of the plan, which equates to 21.2fe. These fall within a mixture of tiers 1-3 when assessed against the county council's approach to calculating child yield. The county council has agreed the most appropriate tier for each site with Three Rivers District Council. The county council's comments are based on the proposed housing figure set out in the consultation. Were the dwelling numbers to increase to meet the Government's Standard Method housing need figure, the county council may need to seek further education allocations accordingly.	th dv alt wł be co all de all pla dv th	the housing target for the local plan, using e standard methodology is 12,624 vellings during the period 2018-2038, though this is reduced to 10,678 dwellings the taking into account completions etween 2018-2020 (608 dwellings), mmitments (948 dwellings) and a windfall owance of 390. 8,973 dwellings will be elivered on the potential housing ocations that are identified in part 2 of the an, which equates to 21.2fe. Were the velling numbers need to increase to meet e Government's Standard Method housing ted figure, the county council may need to	Noted.

gic vision will be reflect more widely nificance for TRDC Council's approach elopment and in itment to the nergency agenda. targets Is SHMA provides a c at affordability ip between housing options nce which will g policies.	Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial vision for individual areas will be revisited following the analysis of the growth options and preferred spatial strategies, which is the subject of the next Regulation 18 stage of the Local Plan (Sep-Oct 2023).
nment's standard sed on long term avirus is short term trend overall growth o Brexit, there is of the impacts that pulation changes. Intinue to monitor e government's logy through the Report and its ations for Three	No action
	No action

		seek further education allocations accordingly.		
SC_000 27_TFL Comme rcial Development Pevelo pment	 Thank you for providing the opportunity to comment on the Three Rivers Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning note and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. TfL CD have engaged through the Local Plan preparation process and have submitted the following representations: Three Rivers Local Plan Issues and Options and Call for Sites (September 2017); Three Rivers Local Plan Issues and Options and Call for Sites (September 2018); Three Rivers Five Year Supply of Land for Housing Assessment (November 2019); Three Rivers Five Year Supply of Land for Housing Assessment (November 2020). TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. We have a portfolio of sites that we will be looking to develop in years to come in areas such as Croxley, Chorleywood and Rickmansworth. All of TfL CD's projects are focussed on delivering optimal, high-quality housing (including genuinely afrordable housing), workspace and public realm around stations, within schemes that relate to and strengthen their neighbourhoods, which make places that people are proud to live in, and which are founded on transparent engagement and best practice. Ti's recently adopted Design Principles, which apply to all its property development prejects, is attached (Annex 1).<!--</td--><td> We have a portfolio of sites that we will be looking to develop in years to come in areas such as Croxley, Chorleywood and Rickmansworth. Given TfL CD's land interests in Three Rivers and the major benefits that development can deliver, particularly in terms of new housing provision, it is critical for there to be a Local Plan in place that will enable such opportunities to be optimised. TfL CD broadly agrees with the proposed vision and objectives and, in particular, directing growth to the most accessible sustainable locations with good public transport and sustainable transport choices. We suggest that consideration is given to also integrating principles of good design in the objective section, and Objective 3 should be stronger on taking opportunities to make effective use of land in urban areas, both of which would ensure consistency with the recent updates to the National Planning Policy Framework 2021 (NPPF). </td><td>Noted • Noted. • Noted. Amend objective 3 to integrate principles of good design.</td><td>No action Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial vision for individual areas will I revisited following the analysis of the growth options and preferred spatial strategies, which is the subject of the nex Regulation 18 stage of the Loc Plan (Sep-Oct 2023). Objective 3 has been amended to embed the good design principles.</td>	 We have a portfolio of sites that we will be looking to develop in years to come in areas such as Croxley, Chorleywood and Rickmansworth. Given TfL CD's land interests in Three Rivers and the major benefits that development can deliver, particularly in terms of new housing provision, it is critical for there to be a Local Plan in place that will enable such opportunities to be optimised. TfL CD broadly agrees with the proposed vision and objectives and, in particular, directing growth to the most accessible sustainable locations with good public transport and sustainable transport choices. We suggest that consideration is given to also integrating principles of good design in the objective section, and Objective 3 should be stronger on taking opportunities to make effective use of land in urban areas, both of which would ensure consistency with the recent updates to the National Planning Policy Framework 2021 (NPPF). 	Noted • Noted. • Noted. Amend objective 3 to integrate principles of good design.	No action Vision statement and strategic objectives have been amended to reflect the emphasis on sustainable development, climate emergency and protection of landscape and townscape character. Spatial vision for individual areas will I revisited following the analysis of the growth options and preferred spatial strategies, which is the subject of the nex Regulation 18 stage of the Loc Plan (Sep-Oct 2023). Objective 3 has been amended to embed the good design principles.
SC_000 Canal & River 28_Can Trust al & River Trust	The Grand Union canal, which runs through the Three Rivers district, is a multi-functional asset and it straddles and crosses the administrative boundary in places, and it is important that the Local Plan takes full consideration of and appropriately addresses issues such as this. The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. It is encouraging that the consultation document acknowledges this with one of the Strategic Objectives identified being to conserve and enhance the Grand Union canal corridor.	Waterways can be used as tools in place making and place shaping and contribute to creation of sustainable communities; the consultation document should acknowledge this as a Strategic Objectives identified being to conserve and enhance Grand Union Canal Corridor	Support noted	No action
SC_000 Hertsmere 29_Her Borough tsmere Council Boroug h Council	 The document appears to be generally sound and consistent with national policy with the exception of the shortfall against the identified local housing need. Aside from this, the main spatial planning topics are suitably reviewed with comprehensive detail, and we welcome the direction of travel in relation to climate change. Further collaborative work on strategic cross boundary infrastructure remains a high priority, in particular sustainable transport options and water management. There is little reference to the provision of infrastructure in the Preferred Policy Options, and we could not see an up to date Infrastructure Delivery Plan amongst the evidence base documents. 	 Generally sound and consistent with national policy with the exception to the shortfall against the identified local housing need Further collaborative work on strategic cross boundary infrastructure remains a high priority, in particular sustainable 	 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 	No action

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		Infrastructure has been highlighted by local residents in Hertsmere as a key priority and we would expect growth in neighbouring authorities to clearly address infrastructure requirements, including where there are cross-boundary needs to be addressed.	 transport options and water management Little reference to infrastructure in preferred policy options and no infrastructure delivery plan published which includes cross boundary needs to be addressed 	 population chang will continue to m changes to the ge standard method Annual Monitoring subsequent impli Collaborative wor relation to cross Infrastructure is throughout the d Infrastructure De not yet been com the early stage o process. The Infr Delivery Plan will alongside the Reg consultation and by infrastructure identify any strat required.
SC_000 30_Hig hways Englan d	Highways England	The Draft Local Plan identifies a number of 'strategic objectives', which provide an outline of what need to be achieved by each site to achieve the wider vision of the Local Plan and to address all key issues identified. These objectives underpin the spatial strategy, policies and proposals which are included within the Local Plan. Comments are requested on a series of strategic objectives covering a range of topics. These are presented as a series of questions in the Three Rivers submission report. Highways England has provided comments below on those relevant to the SRN.	 Provided comments on a series of strategic objectives relevant to SRN check response. 	Noted

ges. The Council monitor any government's dology through the ng Report and its lications. ork to continue in a boundary issues a mentioned document. The velivery Plan has mpleted as this is of the plan making frastructure II be published egulation 19 d will be informed e providers and ategic infrastructure	No Action
	• None