

DM1 Residential Design and Layout				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
CU/0389		Providing current service roads remain as that service road and not allowing new access to new properties.	Proposals to change access roads will be considered against policies on a case by case basis.	No change required
3795		But only if it stops my neighbour from building a side extension to within 1m of my kitchen	Policies will not apply to existing permissions. (Neighbours application for an extension approved 2012) Appendix 2 sets out the design criteria and proximity to the flank boundary will be individually assessed against policies	No changes required.
658	Thrive Homes	<p>Whilst we support the general thrust of this policy we have concerns about vague terminology such as 'awkward access', 'excessive levels of traffic', 'loss of residential amenity' etc. This could lead to inappropriately subjective and restrictive approach to consideration of development opportunities.</p> <p>Appendix 2 Design Criteria. We have significant concerns about the implications of the standards set out in this Appendix. In Section 1 Privacy the adoption of a 28m; privacy' distance is arbitrary and at variance to practice in most other local planning authorities in the UK. Normal practice requires distances of 15-21m. Adoption of such large dimension will reduce site utilisation and densities, thus increasing the amount of land required to accommodate the target housing numbers. The likely consequence of that will be increased encroachment in the Green Belt.</p> <p>Similarly the standards required in Section 3 Amenity Space/Garden Space are significantly higher than experienced elsewhere in the UK. A minimum rear garden length of 14m is excessive. The minimum areas appear excessive. As well as reducing site utilisation, those for flats are likely to represent an increased management cost which will lead to increased service charges to leaseholders or tenants. That will exacerbate the already severe affordability problems in the District.</p> <p>Whilst we acknowledge the appropriateness of the aspirations set out in Section 5 New Development we are concerned that they go into too great an amount of detail.</p>	<p>Each application will be assessed on its own merits. Wording is from the Local Plan.</p> <p>Appendix 2 states that 'The degree of overlooking and privacy inherent in a development will depend on density, layout, distances and angles between buildings....' etc. Section 1. a) states 'As an <i>indicative</i> figure, 28 metres should be achieved ...' It also clearly states the following: 'It is important to note that whilst a development may be in accordance with the guidance contained in this document, in some cases it may still not be considered acceptable based on site circumstances. Likewise, certain developments may not comply with all the guidance but still may be considered acceptable. All applications will be assessed and determined on their own merits.'</p> <p>Section 3 a) states 'Where privacy is achieved by means such as careful layout, screening, or differing levels, rear gardens may be of varied lengths.' It is only where the rear garden length alone is relied on to provide privacy that the minimum length should be 14 metres. As stated above, all applications will be assessed on their own merits.</p> <p>The detail in Section 5 and Figure 1 are considered necessary to ensure development proposals take into consideration impacts on neighbouring properties, both within and surrounding development. All applications will be assessed and determined on their own merits.</p>	No change
SCO/0020	Croxley Green Parish Council	The Council wish to adopt the Parker Morris Standards for new housing in Croxley Green.	<p>Government Guidance says detailed design issues should be left to the developer/market to decide. The exception to this is in relation to social housing which does have its own standards.</p> <p>This guidance is echoed, to some extent, in the recent draft National Planning Policy Framework (NPPF): design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout and access of new development in relation to neighbouring buildings and the local area more generally (paragraph 117).</p> <p>However, there maybe scope to look at room sizes in more detail through our proposed Design Guide SPD in 2012/13 where it may be possible to introduce standards (for example based on 'Parker Morris' standards).</p>	<p>No change required.</p> <p>There may be scope to look at room sizes in more detail through the forthcoming Design Guide SPD in 2012/13 where it may be possible to introduce standards (for example based on 'Parker Morris' standards).</p>

3673	Herts Constabulary Crime Prevention Design Service	<p>Turning to Section 3.0 Residential Design and Layout, paragraph 3.1 mentions “sustainability” referencing PPS1 which in relation to crime include the following comment as contributing towards a sustainable development:</p> <ul style="list-style-type: none"> <li>• Promote communities which are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community.</li> <li>• Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion.</li> <li>• In planning for the achievement of high quality and inclusive design, planning authorities should have regard to good practice set out in amongst others - Safer Places – the Planning System and Crime Prevention. Under the Crime and Disorder Act, Section 17 there is a need to complete a crime audit and look to improve crime prevention</li> </ul> <p>Paragraph 3.3 Design and Access Statements also need to consider and provide crime prevention, paragraph 132 of the Communities and Local Governments document on Guidance on information requirements and validation for Design &amp; Access Statements states: “PPS1 makes clear that a key objective for new developments should be that they create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion. Design and access statements for outline and detailed applications should therefore demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places- the Planning System and Crime Prevention (ODPM/Home Office, 2003). Further advice on ‘Secured by Design’ principles is available from the Police.”</p> <p>There is no mention of the need for designing out crime or crime prevention in the DPD, in our view a serious omission. Paragraph 3.5 mentions Building Futures which does included crime prevention, but again the DPD gives this as Guidance only with no firm steer to designing out crime. Paragraph 3.6 mentions “issues such as crime and antisocial behaviour” without giving a firm steer towards designing out crime.</p> <p>On page 5 under “What you told us” there was strong support for “Reducing crime through the design of new development” and whilst Safer by Design is shown this refers to Health and Safety only and as crime is mentioned the reference must be to Secured by Design! DM1 whilst taking notice of some of the points made in “What you told us” it omits to mention:</p> <ul style="list-style-type: none"> <li>• New development to be designed and built sustainably</li> </ul>	<p>Agreed. For clarification a further bullet point to be added re Design and Access Statements to contain details about how applicants have considered crime prevention in their development proposals and reference to ‘Secured by Design Principles’</p> <p>To provide further clarification of requirements for Design and Access Statements in relation to crime prevention.</p> <p>Designing out crime is incorporated in the Core Strategy in Policy CP12 Design of Development, <i>paragraph h) Design out opportunities for crime and anti-social behaviour through the incorporation of appropriate measures to minimise the risk of crime and create safe and attractive places.</i></p> <p><i>Policy CP1 Overarching Policy on Sustainable Development, paragraph n) promote buildings and public spaces of a high enduring design quality that respects local distinctiveness, is accessible to all and reduces the opportunities for crime and anti-social behaviour.</i></p> <p><i>Detailed design guidance and standards will be provided in the Three Rivers Design Guide Supplementary Planning Document</i></p> <p>Further guidance relating to Secured by Design will be incorporated into the above SPD in consultation with Hertfordshire Constabulary’s Crime Prevention Design Advisor.</p>	<p>Paragraph 3.3 changed to:</p> <p>It will need to demonstrate how the proposed development will:</p> <ul style="list-style-type: none"> <li>• Maximise energy efficiency and address water and drainage requirements</li> <li>• Achieve an inclusive environment that can be used by everyone, regardless of age, gender or disability <del>and</del></li> <li>• Take account of transport considerations <u>and</u></li> <li>• <u>Incorporate crime prevention measures in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places- the Planning System</u></li> </ul> <p>The Design Council provides guidance on Design and Access Statements which is available at <a href="http://www.designcouncil.org.uk">www.designcouncil.org.uk</a>. <u>Further advice on ‘Secured by Design’ principles are available from the Police at <a href="http://www.securedbydesign.com">http://www.securedbydesign.com</a>.</u></p> <p>No change required.</p>
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NSO/0078	Chilterns Conservation Board	The Board supports this policy as drafted.	Support Noted	No change required
3999	McCarthy And Stone Retirement Lifestyles Ltd	<p>The Council is weak on policy that promotes housing and accommodation for the ageing population. Core Strategy Policy CP3 at the more strategic level makes references to the encouragement of housing for the elderly and supported and specialist accommodation in suitable and sustainable locations. The opportunity exists to provide a dedicated policy or acknowledge within Policy DM1 the benefits of older person’s accommodation including owner occupier retirement and extra care housing. The SHMA identifies that some projected 1200 population increase by 2021 will be mainly in the over 50 sector. The number of households will increase to 2,900 (8.5%) with mainly single persons households. The opportunity exists to provide more policy support for this sector.</p> <p>Retirement housing is a highly sustainable and specialist form of accommodation which will significantly help to address the need for accommodation for the older population. It will provide options and choices for people who may be looking to downsize and relocate to more accessible locations within the borough. By actively supporting such accommodation at policy level whether through proactive policies or specific land allocation the supply of retirement housing will increase and help release larger properties back into the housing market for more efficient use of the housing stock. Taking into account the national evidence of an ageing population which is backed up at the local level a specific reference to the needs of an ageing population should be included to identify the wide ranging issues that will; be associated with a larger proportion of people in need of accommodation care and other facilities, which cannot be addressed under the wider 'residential' heading. The complex needs, expectations, provision of care and support will vary considerably within this age group and there will be a need to provide a holistic approach to different types of housing and care provision from the public and private sector. This position is backed up by a number of policy documents including the following: The draft NPPF para 28: LPA’s need to prepare a Strategic Housing Market Needs Assessment should identify the scale and mix of housing an the range of tenures that the local population are likely to require over the plan period which: 1. meets household projections and demographic and migration change 2. Address the need for all types of housing including affordable and the needs of different groups in the community e.g. older</p>	<p>The Core Strategy Policy CP3 Housing Mix and Density states that ‘The Council will require housing proposals to take into account the range of housing needs in terms of size and type of dwellings as identified by the Strategic Housing Market Assessments .....This includes provision of housing for the elderly and supported and specialist accommodation which will be encouraged in suitable and sustainable locations.’</p> <p>Core Strategy Policy CP1 g) states ‘build mixed and sustainable communities by providing housing across a range of tenures and types including affordable housing’</p> <p>No need to repeat in Development Management Policies DPD</p>	No change required

		<p>people 3. Caters for housing demand and scale of housing to meet demand. Also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability and suitability and the likely economic viability of land to meet the identified requirement for housing over the plan period. At Para 111 in seeking to deliver a wide choice of quality homes and widen opportunities for home ownership, Local planning Authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community such as families with children the elderly and people with disabilities. The CLG publication 'Sustainable Planning for Housing in an ageing population' (2008) reports: 1. some 1 in 3 households are already headed by somebody over 60. 2. Older people will represent 48% of all growth in households from 2004-2026 3. The over 65s will grow from 8.3m in 2008 to 11.4m by 2025 4. The 80+ will grow by 1million from 2008 and 2025 an increase of almost 50% 5. Population ageing has major implications for a wide range of public services, including health and social care expenditure. Key findings from the 'Population Trends' by national Statistics tell us that: 1. the UK population is projected to increase gradually from an estimated 58.8m in 2001 to over 63m by 2026. This is equivalent to an average annual rate of growth of 0.28%. Longer-term projections suggest the population will peak around 2040 at nearly 64m and then gradually start to fall. The highest rise is expected in the over 85's group. 2. The UK population will gradually become older with the mean age projected to rise from 39.1 years in 2001 to 42.4 years in 2026. 3. By 2007 the population of pensionable age exceeded the number of children 4. The number of people at state pensionable age is projected to increase by over 10.5% from 10.8 million in 2001 to 12.0 million by the end of 2011. Allowing for the change in women's state pension the population of pensionable age will rise only slightly further (to 12.2 million) by 2021. However a faster increase will then resume with longer-term projections suggesting the number over pensionable age will peak at over 15 million around 2040. in recognition that meeting the housing needs of the older population is of growing concern and priority the previous Government prepared and published 'Lifetime Homes, Lifetimes Neighbourhoods. A National Strategy for Housing in an Ageing Society'. In introduction tot he strategy the then Prime Minister noted that 'One of the biggest challenges of the 21st century is the challenge of an ageing population'. The strategy advises that housing and planning for an ageing population is now a cross-Government national priority and notes that older people will make up 48% of the increase in new households by 2026 with this figure reaching as high as 90% in some areas. In terms of addressing housing needs for the older population the strategy recognises the need to build more mainstream and specialised housing for older people and the need to provide more homes and more choice. Recognising also that the majority of older persons are owner occupiers who will most likely want to remain so 9the strategy advises that the over 60s have in total almost £932 billion in equity in their homes) the strategy therefore recognises the benefits of sheltered housing and specialised housing for the elderly and the need to provide considerably more - by supporting such developments through both planning policy and development management decisions. Britain's population is ageing yet the range of living options for the elderly has shrunk at the same time as data on the new building of specialist housing for the elderly show. 50 years age specialists housing was based on public rental housing and social service agenda. Rising living standards, the growth of owner occupation amongst the elderly and changing perceptions of the role of government at national and local levels have changed all that. But the private sector has not been able to expand the accommodation it offers to any great extent. In fact the amount built for sale in the past decade is far less than it was in the 1980s. it goes on to explain and advise; the demand for specialist owner occupier retirement housing greatest in the UKs ageing population amongst those suffering from the frailties of old age and who are consequently physically constrained in what they can do or from</p>		
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		those who are experiencing increasing isolation, often because of the recent loss of a loved one. These characteristics were used to make some scenario forecasts of the potential demand for Owner Occupier Retirement Housing. Those estimates show that, even on the modest assumptions, the underlying demand for owner Occupier Retirement Housing is currently substantial and will grow in the future. Further recognition of this point is required to make the DMPDPD document sound and in line with planning guidance. A proactive positive policy should encourage a range of high quality, well designed accommodation for the ageing population subject to reasonable locational, design and sustainability criteria.		
3744	Howard Sharp & Partners LLP (Jonathan Harbottle)	Policy should emphasise design led solutions rather than rule out certain design approaches in principle. For example tandem development of one property behind another is not necessarily inappropriate and there are many Councils and Inspectors who have allowed tandem development on its merits. Policy should be cast more simply to encourage and expect high quality design.	The Council considers that tandem development (and other garden land or infill development) can erode the particular character of the area or impact on the residential amenity of existing and new occupants. Applications for tandem development will not normally be supported by the Council, however every application will be considered on its own merits.	No change required
2126	Banner Homes Ltd	<p>Policy DM1 fails to acknowledge the contribution that back land or infill development, often involving garden land, can make towards housing choice particularly within a Green Belt LPA, and is unduly restrictive. In particular, it appears to represent a moratorium against development on garden land. In particular we would pose the following questions. Why should tandem development be unacceptable in principle? Its acceptability is surely dependent on a raft of material considerations including site circumstances.</p> <p>What are 'excessive levels of traffic' within the context of tandem development? How will cumulative proposals be assessed by the LPA.</p> <p>As regards to Appendix 2 we would make the following points; 28 metre 'back to back' distances seem excessive and would preclude any forms of backland development particularly in urban areas.</p> <p>The minimum garden length cited in paragraph 3 (a) at 14 metres is arbitrary and has to be weighed against other material considerations including site circumstances. The same criticism applies in relation to the proposed garden sizes.</p> <p>In conclusion the LPA approach is unduly restrictive and contrary to inter alia the aim and objectives of the draft NPPF</p>	<p>The Council considers that tandem development (and other garden land or infill development) can erode the particular character of the area or impact on the residential amenity of existing and new occupants. Applications for tandem development will not normally be supported by the Council, however every application will be considered on its own merits.</p> <p>This will depend on individual site and development proposals.</p> <p>Appendix 2 states that 'The degree of overlooking and privacy inherent in a development will depend on density, layout, distances and angles between buildings....'</p> <p>etc.</p> <p>Section 1. a) states 'As an <i>indicative</i> figure, 28 metres should be achieved ....'</p> <p>It also clearly states the following: 'It is important to note that whilst a development may be in accordance with the guidance contained in this document, in some cases it may still not be considered acceptable based on site circumstances. Likewise, certain developments may not comply with all the guidance but still may be considered acceptable. All applications will be assessed and determined on their own merits.'</p> <p>Section 3 a) states 'Where privacy is achieved by means such as careful layout, screening, or differing levels, rear gardens may be of varied lengths.'</p> <p>It is only where the rear garden length alone is relied on to provide privacy that the minimum length should be 14 metres. As stated above, all applications will be assessed on their own merits.</p> <p>The Development Management Policies DPD has considered the requirements of the draft NPPF. When the final NPPF is published the document will be reviewed to ensure it is in compliance.</p>	<p>No change required</p>
SCO/0057	Natural England	<p>DM1 – Residential Design and Layout</p> <p>In paragraph 3.10, reference is made to the Council's forthcoming Design SPD. We would request that the Design SPD includes information/references on how to accommodate and enhance for biodiversity through design.</p> <p>Obvious reference to the forthcoming Green Infrastructure and Landscape SPD should also be made within the Design SPD. Green Infrastructure should be incorporated into the design of new developments wherever possible and at an early stage. Guidance on</p>	Agreed. Design SPD will include references and further information links on how to accommodate and enhance for biodiversity through design.	No change required

		<p>how new developments can contribute to the delivery of Green Infrastructure should be provided and easily accessible.</p> <p>We would also like to see Natural England's Standards for Accessible Natural Greenspace (ANGSt) incorporated into the Green Infrastructure and Landscape SPD (see link below).  <a href="http://www.naturalengland.org.uk/ourwork/enjoying/places/greenspace/greenspacestandards.aspx">http://www.naturalengland.org.uk/ourwork/enjoying/places/greenspace/greenspacestandards.aspx</a></p> <p>PPS9 (Biodiversity and Geological Conservation) and Core Strategy Strategic Objective S9 are not currently referenced in the policy links section. It is recommended that these are added given that residential development could potentially impact on biodiversity. Similarly Core Strategy CP9 (Green Infrastructure) should be referenced as it forms an integral part of development design.</p>	<p>Agreed. Natural England's Standards for accessible Natural Greenspace will be incorporated into the Green Infrastructure and Landscape SPD</p> <p>Add CP9 to CS policy links and S9 to CS objectives list. Not necessary to list all national guidance.</p>	<p>No change required.</p> <p>Add CP9 to CS policy links and S9 to CS objectives list. Not necessary to list all national guidance.</p>
SCO/0008	Dacorum Borough Council	<p>We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.</p>	Support noted	
SCO/0006	Highways HCC Spatial and Land Use Planning	<p>Highways</p> <p>Reference is quite rightly made to the guidance on sustainable design that is given in the Building Futures website. Since the policy is not just concerned with design but also explicitly with layout it would be appropriate if reference were made in the Further Guidance section of DM1 to the County Council's highway design manual 'Roads in Hertfordshire - Highway Design Guide' which can be downloaded at <a href="http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherths/">http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherths/</a>.</p>	Agreed.	<p>Further Guidance, Additional Information changed to include:</p> <p><a href="http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherths/">Roads in Hertfordshire – Highway Design Guide: http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherths/</a>.</p> <p><b>Reasoned Justification</b></p> <p>3.13 Policy DM1 is in accordance with national and regional policy frameworks and reflects local priorities to maintain, protect and enhance the quality of the built environment and in particular residential amenities. The approach will contribute directly to the Core Strategy Objective 3: in relation to adapting design and considering climate change; <a href="#">to Objective 9: in relation to conserving and enhancing the countryside and diversity of landscapes, wildlife and habitats</a>; to Objective 10: new development respecting the unique character and identity of the towns and villages in the District; and Objective 12: creating safe and attractive places to live</p>
CU/0193	Rickmansworth & District Residents' Association	<p>The Association supports the policy and it needs to be applied to the housing requirements section of the Site Allocations DPD.</p>	<p>The Development Management Policies DPD will be used to assess and determine all planning applications including those for developments sites allocated in the Site Allocations DPD</p>	No change required



		<p>Secondly, paragraph 4.3 includes an error which could also lead to misinterpretation of Green Belt policy, through the omission of the word 'other' from the final sentence, which should read 'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.'</p> <p>Thirdly, paragraphs 4.4 and 4.5 need to be re-written to reflect the abolition of the East of England Plan.</p> <p>Fourthly, the outline of consultation responses about the strong support for protection of the Green Belt under the heading 'What you told us' in paragraph 4.8 should also refer to representations on the Core Strategy.</p> <p>CPRE Hertfordshire therefore requests the above alterations to paragraphs 4.2, 4.3, 4.4, 4.5 and 4.8 of the DPD.Green Belt Policy.</p> <p>Changes to Policy DM2 Green Belt, are also sought by CPRE Hertfordshire. Whilst we understand the 'reasoned justification' set out after the policy, both this and the policy itself, fail to reflect the imminent replacement (before the DPD is adopted) of national policy guidance and the similar abolition of regional policy, resulting a failure to provide the essential context for protecting the Green Belt that is claimed by the current wording.</p> <p>This problem applies in particular to the part of the policy headed New Dwellings, wherein the policy solely refers to approval for those buildings 'detailed in national and other relevant guidance.' CPRE Hertfordshire considers that this policy, the only development management policy against which new housing proposals in the Green Belt will be assessed, must set out the criteria that will be used by Three Rivers Council when determining such planning applications, or the DPD will be unsound in that it will be ineffective in achieving the objectives set out for it.</p> <p>The specific references to PPG2, draft NPPF, and Regional policy SS7 should also be removed for the above reasons. Each of the subsections of Policy DM2, on Extensions to Dwellings, Replacement Dwellings, Ancillary Buildings, and Re-use and Conversion of Buildings in the Green Belt, also omit the key requirement that the proposed development should not affect the openness of the Green Belt. CPRE Hertfordshire considers that this also reduces the effectiveness of the policy which is unsound as a result, and therefore seeks the inclusion of this requirement in each of the above subsections.</p> <p>CPRE Hertfordshire is, however, extremely concerned about the absence of any proposed development management policy for controlling non-residential development in the Green Belt. Policy DM2, as currently drafted, includes no statements on how such proposals will be determined, yet this is the only Green Belt policy in the DPD. In our opinion this is a fundamental flaw in the DPD as currently worded that would result in decisions on individual planning applications for example for employment, business and retail development in the Green Belt being determined solely in the context of Policy CP11 of the Core</p>	<p>Agreed. Sentence corrected in line with National Planning Policy Framework.</p> <p>Reference to the East of England Plan will be removed once it has been abolished.</p> <p>The 'What you told us' was included in the consultation document for information purposes. These will not be taken through into the publication DPD</p> <p>See above</p> <p>Noted. Consideration of the National Planning Policy Framework has been given. Section on new dwellings has been updated to refer to sites identified in the Site Allocation DPD. It is up to the applicant to demonstrate that there are very special circumstances on all other sites.</p> <p>Core Strategy Policy CP11 states 'There will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within in.'</p> <p>No need to repeat in DM Policies DPD</p> <p>The NPPF sets out the criteria for appropriate development and reflects most of PPG2. Additional wording re 'openness of the Green Belt' not required as repetition of national policy is not necessary.</p> <p>All applications for new development will be determined against all relevant policies in the Core Strategy and Development Management Policies DPD.</p> <p>Change made to DM2 from 'New Dwellings' to New Development' and 'Extensions to Dwellings' to 'Extensions to Buildings'. Relevant parts of the policy applies to all buildings not just dwellings</p>	<p>Paragraph 4.3 (Final sentence)</p> <p>'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any <b>other</b> harm is clearly outweighed by other considerations'.</p> <p>No change</p> <p>No change</p> <p>No change (See 00637 Rep change)</p> <p>Policy DM2 DM2 Green Belt</p> <p>New <del>Dwellings</del> <b>Buildings</b></p> <p>Within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those detailed in national and other relevant guidance.</p>
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		Strategy, and the forthcoming NPPF. We consider that the DPD would be unsound as a consequence, in that it would be ineffective in achieving the objectives set out in the Core Strategy, and inconsistent with national policy for the protection of the Green Belt.		<p><u>Extensions to <del>Dwellings</del> Buildings</u></p> <p>Extensions to <del>dwellings</del> buildings in the Green Belt that are disproportionate in size (individually or cumulatively) to the original <del>dwelling</del> building will not be permitted. The <del>dwelling's</del> building's proximity and relationship to other buildings and whether it is already, or would become, prominent in the landscape will be taken into account.</p>
SCO/0017	HCC Property and Technology	<p>This policy appears to only refer to residential and re-use/conversions. It does not refer to other development such as schools which may be located in the Green Belt.</p> <p>An approach to the issue of education sites in the Green Belt might be to include a DM policy on education which could cover GB issues.</p> <p>Policy DM2</p> <p>The policy relates to residential development in the Green Belt including both new and existing properties and the conversion of existing buildings. Whilst it is important to protect the Green Belt, the lack of any clear policy in relation to education does cause the County Council some concern in relation to new and expanding schools. Three Rivers District Council will be aware that the increasing demand for school places at both primary and secondary level arising from the rising birth rate, new developments and parental choice, lead to changes in the provision of school places possibly throughout the plan period. As a result of this, and given that there are a large number of existing schools situated within the Green Belt, it would be helpful to include a reference to education facilities within the policy to allow minor extensions to schools without the requirement to prove a very special circumstances case in each instance or to exclude the built area of the school from the Green Belt.</p> <p>Where a new education facility is provided on a Green Belt site it would be reasonable to have a flexible policy so that there could be an adjustment of the Green Belt boundary to exclude the school buildings area to facilitate future development at the school. The playing fields could remain in the Green Belt preserving the openness of the site.</p>	<p>Change made to DM2 re allocated sites which would include education allocations.</p> <p>DM2 changed to include extensions to buildings in the Green Belt which will include education facilities</p> <p>Applications for new educational facilities or extension to existing educational facilities within the Green Belt will need to prove 'very special circumstance'.</p> <p>The Council does not consider the removal of built areas of schools from the Green Belt appropriate. In most cases this will result in 'holes' in the Green Belt.</p> <p>The Council wishes to maintain some control over the land in the future should the land no longer be required for educational purposes. There have been several schools closed in the District in the last 20 years where the land has been sold on to developers and the land developed. The Council want to ensure the long term protection of the Green Belt in line with the objectives of the Core Strategy.</p> <p>The District Council will continue to work closely with the county Council to discuss their specific requirements.</p>	<p>See changes made above.</p> <p>No change</p> <p>No change</p> <p>No change</p>
Selves	Development Management	Reference to S2 missing from 'Reasoned Justification' paragraph.		<p>Addition of wording to Reasoned Justification paragraph:</p> <p>This policy links directly to Core Strategy Objective 1: to ensure that development in Three Rivers recognises and safeguards the District's distinctive character of small towns and villages interspersed with attractive countryside and Green Belt, through sustainable patterns of development—; <u>Objective 2: to make efficient use of previously developed land and Objective 9: to conserve and enhance the countryside and the diversity of landscapes, wildlife and habitats in the District.</u></p>

DM3 The Historic Built Environment				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
CU/0389		Any building damaged by fire or flood must be returned to original condition by owner and any planning permission refused.	Where planning permission is needed to rebuild or repair an historic asset the planning application will be determined on its own merits.	
1764	HCC Historic Environment	<p>There are currently 885 archaeological monuments known from the district. Where relevant these are currently represented in the 18 Areas of Archaeological Significance although these are subject to regular review and can include sites archaeological potential in accordance with PPS 5 policy 2.3.</p> <p>We suggest that the following amended paragraph is included: Known archaeological sites and sites of known potential in the district are identified on the proposals map as Areas of Archaeological Significance. Information and advice about these and other non-designated heritage assets with archaeological interest may be obtained from the historic Environment Unit of Hertfordshire County Council. The Areas of Archaeological Significance are subject to regular revision and the absence of designation should not always be taken to mean that there is no archaeological potential. Prospective developers should contact the County Council to obtain the most up-to-date information and establish whether there is potential archaeological interest and establish the need for investigation and evaluation at an early stage.</p> <p>Comments We suggest that the current policy on archaeology is replaced by the following:</p> <p>Archaeology Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, it must be accompanied by an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation.</p> <p>There is a presumption against any harm to Scheduled Monuments and heritage assets with archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments.</p> <p>Where the loss of the whole or a material part of a heritage asset's significance (archaeological interest) is justified, planning conditions will be included in any permission to ensure that an adequate record is made of the significance of the heritage asset before it is lost. This will be secured through an archaeological written scheme of investigation (WSI) which must include provision for appropriate publication of the evidence.</p> <p>Reasons The revised policy uses the terminology of the current PPS 5: Planning for the Historic Environment takes into account the policies of the 2011 draft NPPF, and the 2010 DCMS statement on Scheduled Monuments.</p>	<p>Agreed. Paragraph 5.19 to be replaced. To clarify</p> <p>And to be identified on the proposals map.</p> <p>Agreed. Section on Archaeology within Policy DM3 to be amended to reflect correct terminology.</p> <p>To clarify requirements of HCC Historic Environment and to use correct terminology</p>	<p>Paragraph 5.19</p> <p>There are 18 <u>Areas of Archaeological Significance sites of known archaeological interest</u> in the District. <u>Information and advice about these and other non-designated heritage assets with archaeological interest may be obtained from the historic Environment Unit of Hertfordshire County Council. The Areas of Archaeological Significance are subject to regular revision and the absence of designation should not always be taken to mean that there is no archaeological potential. Prospective developers should contact the County Council to obtain the most up-to-date information and establish whether there is potential archaeological interest and establish the need for investigation and evaluation at an early stage.</u></p> <p>The Hertfordshire Historic Environment Record, held by Hertfordshire County Council, gives information on archaeological sites and monuments. However, given the wealth of the past in Hertfordshire, this record can never be complete and new areas will be added as new information comes forward. Prospective developers should contact the County Council to establish whether there is potential archaeological interest and establish the need for investigation and evaluation at an early stage. Sites of known archaeological interest are shown on the Proposals Map.</p> <p>Policy DM3 Archaeology</p> <p><u>Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, it must be accompanied by an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation.</u></p> <p><u>There is a presumption against any harm to Scheduled Monuments and heritage assets with archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments.</u></p> <p><u>Where the loss of the whole or a material part of a heritage asset's significance (archaeological interest) is justified, planning conditions will be included in any permission to ensure that an adequate record is made of the significance of the heritage asset before it is lost. This will be secured through an archaeological written scheme of investigation (WSI) which must include provision for appropriate publication of the evidence.</u></p> <p>Archaeological deposits and remains should be recorded</p>

				and where possible preserved in situ. Proposals which would adversely affect archaeological remains or their settings are unlikely to be supported. Where archaeological potential is considered to exist by the Historic Environment Unit of Hertfordshire County Council applications which are likely to affect archaeological deposits must be accompanied by a desk top survey or if this is insufficient to properly assess the interest, a field survey and Written Scheme of Investigation will also be required.
NSO/0078	Chilterns Conservation Board	The Board supports this policy as drafted.	Support noted	No change
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted	No change
CU/0193	Rickmansworth & District Residents' Association	The Council must work with other local authorities, the government and the energy industry to see how best to manage this policy so that systems designed to save energy, such as solar panels and double glazing, can be applied to older buildings that are either listed or within conservation areas.	Noted. Planning applications for installation of solar panels or other technologies will be assessed on individual merits. The need to save energy, reduce carbon emissions and the potential to harm the historic environment will be considered. (Paragraph 5.22 refers).	No change

**DM4 carbon Dioxide Emissions and on site Renewable Energy**

Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
498		I do not want to see anything like wind farms en mass they are very ugly and can be very noisy.	Noted. Policy DM5 sets the criteria for any large scale renewable developments. No change.	No changes
658	Thrive Homes	<p>We support the objective of reduced co2 emissions and improved sustainability in new residential development. However we have concerns about the approach to be adopted. We would suggest that, rather than using a bespoke system applicable to only a small number of local authorities in Hertfordshire and Bedfordshire, a nationally recognised standard such as the CSH is applied. This could either be instead of the proposed policy or as an alternative.</p> <p>Furthermore the standards proposed appear not to allow the development of passivhaus standard dwellings which are generally recognised to be an even more effective way of reducing co2 emissions.</p>	<p>Support of the objective noted.</p> <p>The use of CPLAN carbon monitoring tool is a requirement of Policy CP1 of the adopted Core Strategy and as such does not need to be repeated in Policy DM4. Reference to requirements of CP1 is already stated in paragraph 6.12. Link to CPLAN added for ease of reference.</p> <p>Our approach compliments the Code for Sustainable Homes and does not prevent applicants using it but they must be able to evidence, through CPLAN, how successful they are at meeting policy targets.</p> <p>The policy does not specifically allow for passivhaus standard dwellings but does not stop these from being proposed if they meet the policy criteria. All applications will be considered on their own merits.</p>	<p>DM4 <del>Applications for all new residential development of one unit and above, and for all new commercial development, must be submitted with a C-Plan Energy and Sustainability statement available at <a href="http://threeriverschecklist.co.uk/default.aspx">http://threeriverschecklist.co.uk/default.aspx</a> as required by Policy CP1 of the Core Strategy.</del></p> <p>6.12 This policy requires applicants for all new residential development of one unit and above and for all new commercial development to submit a C-Plan Energy and Sustainability Statement demonstrating the extent to which sustainability principles have been incorporated into the proposals and the expected carbon emissions. <u>This is available at <a href="http://threeriverschecklist.co.uk/default.aspx">http://threeriverschecklist.co.uk/default.aspx</a>.</u></p> <p>No changes</p>
SCO/0020	Croxley Green Parish Council	The Parish Council wish to see any new housing in Croxley Green built to Code for Sustainable Homes level 6 unless there is good reason not to.	Code level 6 is considered unachievable by the Government on most sites and would, if implemented, have an adverse effect on viability of development proposals which is against national policy. New policy sets a target above that which is required by Building Regs 2013 which is considered achievable. No change.	See revised policy.
3673	Herts Constabulary Crime Prevention Design Service	Section 6 relates to Carbon emissions and it is probably important at this stage to mention work completed by Professor Ken Pease entitled "The carbon cost of crime and its implications" in which he concludes "using crime prevention techniques, such as Secured by Design can at current domestic burglary rates (expected to rise in response to economic recession) the marginal carbon cost of building a home to Secured By Design standards would be recovered within four years, given the observed reduction in a mix of offences associated with the implementation of such standards, and recent evidence about the long duration and increased magnitude of the crime reduction gains afforded by SBD." It can therefore be seen Secured by Design is also another weapon in reducing the carbon footprint further details can be found on the website <a href="http://www.securedbydesign.com">www.securedbydesign.com</a> together with other related documents. There is no doubt SBD can assist in reducing carbon emissions as it will reduce crime and therefore the carbon footprint associated with say burglary will be greatly reduced.	Noted. No change	
637	Merchant Taylors Company	<p>This policy is Supported in principle subject to incorporation of appropriate flexibility to ensure best possible solution is achieved for new development without constraining appropriate development opportunities.</p> <p>Paragraph 2 of the policy should incorporate sufficient tests in terms of feasibility and/or viability in meeting the requirements on a site by site basis to ensure that development is not constrained on appropriate development sites. Where it can be demonstrated, through a robust assessment using the Council's preferred methodology, that requirements cannot be achieved an element of flexibility should be built</p>	<p>Flexibility is within the policy.</p> <p>As required by the Core Strategy, CPLAN will be used to measure feasibility and viability. The policy is considered flexible. No change</p>	

		<p>into the policy. The second paragraph should therefore be updated to state that where developments do not meet these targets they considered accepted where it has been demonstrated through technical feasibility or viability that the requirements cannot be met.</p> <p>Again this requirement should also be incorporated into Para 4 so that new residential developments (from 2016) will be acceptable where they can demonstrate that a zero carbon standard cannot be met due to site constraints, technical feasibility or viability</p> <p>Para 3 of the policy should identify that connection to a local decentralised, renewable or low carbon energy supply will be sought only where this is available. Helpful if reference and further details/information on the CPLAN Energy and Sustainability statement were to be set out in the supporting text and/or appendix</p>	<p>It will be a requirement from 2016 for all developments to meet the zero standards and this will have to be achieved by 70% carbon emission savings through energy efficiency measures and carbon compliance on site. The residual CO2 emissions (30%) are to be dealt with through 'Allowable Solutions'. This will include a variety of measures that developers can choose from but may also include a monetary contribution of £s per CO2 kg, which will be set by Government.</p>	
3744	Howard Sharp & Partners LLP (Jonathan Harbottle)	<p>This policy would soon become out of date and potentially in conflict with NPPF is remaining as drafted - policy should state that the Council will require to the standards set down by Government - could state that the Council will seek the highest levels of sustainability on sites having regard to site specific circumstances wherever possible to minimise carbon emissions - should leave it for the applicant to select a path and blend of measures to meet the policy</p>	<p>Agree that the policy will be out of date by the time the DPD is adopted and considering the forthcoming changes to the Building Regulations in 2013.</p> <p>Additional wording to explain new definition of zero carbon, carbon compliance and allowable solutions added.</p> <p>It is considered appropriate to set a target for carbon emissions above those required by Building Regulations between 2013 and 2016 through measures such as renewable energy etc where this is feasible and viable.</p> <p>Policy DM4 changed to reflect future changes to Building Regulations</p>	<p>New paragraphs 6.6, 6.7 and 6.8</p> <p><u>6.6</u> <u>In 2009 the Minister for Housing and Planning confirmed the policy to require all new homes to be zero carbon from 2016 and set out the proposals which will be taken to implement it.</u></p> <p><u>6.7</u> <u>Developments will not be required to achieve zero carbon emissions entirely within the site boundary. Instead there will be a minimum requirement for emission savings through energy efficient design of the building fabric (set by Building Regulations). Further measures will be required to achieve 'carbon compliance' on site, bringing the emission savings onsite up to 70% by 2016. This may include measures such as improved energy efficiency of the buildings fabric (above what is required by Building Regulations), on site low carbon and renewable technologies and/or connection to on site or off site heat networks or a combination of these measures.</u></p> <p><u>6.8</u> <u>The residual CO<sub>2</sub> emissions beyond carbon compliance in 2016 are to be dealt with through 'Allowable Solutions' which are yet to be determined by the Government but are likely to include:</u></p> <ul style="list-style-type: none"> <li>• <u>Carbon compliance – beyond the minimum 70% level</u></li> <li>• <u>Credits for energy efficiency appliances or building controls to reduce energy demand</u></li> <li>• <u>Exporting low carbon or renewable heat from a development</u></li> <li>• <u>Credit for contribution by the developer in low or zero carbon energy infrastructures such as a local heat network</u></li> <li>• <u>Improving the energy efficiency of existing buildings in the vicinity</u></li> </ul>

				<p>Policy DM4</p> <p>Applications for all new residential development of one unit and above, and for all new commercial development, must be submitted with a C-Plan Energy and Sustainability statement available at <a href="http://threeriverschecklist.co.uk/default.aspx">http://threeriverschecklist.co.uk/default.aspx</a> as required by Policy CP1 of the Core Strategy.</p> <p>From 2013, applicants will be required to demonstrate that development will produce <del>15</del> 5% less carbon dioxide emissions than Building Regulations Part L requirements (2010 <del>2013</del>) <u>having regard to feasibility and viability, with a minimum of 10% being provided</u> <u>This may be achieved through a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, connection to a local, decentralized, renewable or low carbon energy supply.</u> <u>by on-site renewable and low carbon (i.e. combined heat and power) energy systems.</u></p> <p><del>In line with Government Policy, where it can be proven that on-site renewable technology is not feasible, the Council will consider connection to a local, decentralised, renewable or low carbon energy supply as a substitute for on-site renewable technology.</del></p> <p>From 2016, applications for new residential development will be required to demonstrate that the development will meet a zero carbon standard (as defined by central government). The same standard will be applied for non domestic buildings from 2019.</p> <p>In line with Government policy, the Council will support a range of allowable solutions for dealing with the remaining carbon emissions. This may include payment into a Carbon Offset Fund which will be used to retrofit existing building stock with energy saving measures for the future. The approach will be set out in a further SPD.</p>
1491		Some Councils have brought forward the national law for all housing to be carbon neutral by 2016. This should be done in TRDC, so all housing is equivalent to code for sustainable housing level 6. TRDC should do as they say, i.e. be a leader in this respect.	Code level 6 is only achievable on very few exemplar sites and if used as a standard will prevent development, which is against national policy. The Development Management policies DPD will not be adopted until the autumn in 2013. In 2013 the Building Regulations are going to change to require further reductions of carbon emissions of 25% above that required by Building Regulations 2010. The Council is seeking to set ambitious yet achievable targets over and above the national minimum.	
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted	
CU/0193	Rickmansworth & District Residents' Association	The Council must work with other local authorities, the government and the energy industry to see how best to manage this policy so that systems designed to save energy, such as solar panels and double glazing, can be applied to older buildings that are either listed or within conservation areas.	Agreed.	

DM5 Renewable Energy Developments				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
1491		Yes but should be stronger	Support noted. Unable to determine what is meant by 'should be stronger'.	No change
NSO/0082	Herts & Middlesex Wildlife Trust	Herts & Middlesex Wildlife Trust supports the concept of renewable energy as an integral part of the necessary shift to a more environmentally sustainable society and economy, although we recognise that renewable energy installations can conflict with other issues of importance to society – including wildlife and habitat conservation. We support the policy's reference to considering the impacts of renewable energy developments on the natural, built and historic environment and on natural resources.	Support noted.	No change
SCO/0057	Natural England	<p>Large scale renewable energy developments can have significant impacts on biodiversity. It is recommended within the Sustainability Appraisal (SA) that DM5 should 'explicitly include biodiversity in the list of topics to be assessed'. We would also like to see this included as a separate topic in the policy with cross reference to PPS9 and Core Strategy Strategic Objective S9 in the policy links section.</p> <p>We would also request that potential cumulative impacts of renewable energy developments on biodiversity and the natural environment are addressed as well as impacts associated with individual applications.</p>	<p>Agreed. DM5 to include biodiversity in the list of topics to be addressed.</p> <p>Agreed. Additional wording to be added to state that the cumulative impacts of renewable energy developments on biodiversity and the natural environment will be assessed.</p>	<p>Policy DM5 Renewable Energy Developments</p> <p>In considering proposals for large-scale renewable energy developments, assessment will take into account potential impacts on:</p> <p>Residential/workplace amenity</p> <ul style="list-style-type: none"> <li>• The visual amenity of the local area, including landscape character</li> <li>• Local natural resources, including air and water quality</li> <li>• The natural, built and historic environments</li> <li>• <b>Biodiversity</b></li> <li>• Public access to the countryside</li> <li>• The openness and visual amenity of the Green Belt.</li> <li>• Other site constraints.</li> </ul> <p><u>The Council will take into account the individual and cumulative impacts of applications for renewable energy developments on the above.</u></p> <p>Micro-renewables</p> <p>In considering proposals for micro-renewables (such as, but not limited to, micro-wind turbines and solar panels), assessment will be take into account the following potential impacts on:</p> <ul style="list-style-type: none"> <li>• Residential/workplace amenity</li> <li>• The character and visual amenity of the local area.</li> <li>• The natural, built and historic environment</li> <li>• The openness and visual amenity of the Green Belt</li> <li>• Other site constraints.</li> </ul>
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support Noted	

**DM6 Biodiversity, Trees, Woodlands and Landscaping**

Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
637	Merchant Taylors Company	<p>The principles of this policy are supported subject to minor modifications to clarify requirements re existing trees and landscaping. Overall thrust to protect existing trees etc supported. However, policy should be refined to ensure scope exists to remove trees and features that do not contribute in terms of quality or amenity value where appropriate, and where alternative landscaping will result in overall improvement.</p> <p>1st para in relation to the Tress, Woodland &amp; Landscape section of this policy should be updated to clarify that proposals should seek to retain trees and other important landscape and nature conservation features where of notable quality where retention is required or where they contribute in terms of amenity value.</p> <p>Clarification should also be provided in relation to para 5 of this section in terms of trees and hedges, with reference included in the text to the retention of these features where they are of value, to ensure the policy provides suitable flexibility to enable the removal and replacement of existing trees where appropriate.</p>	<p>Paragraph in DM6 states that</p> <p>'Planning permission will be refused for any development that would be liable to cause demonstrable harm to <i>protected</i> woodland (including ancient woodland), trees and hedgerows, unless conditions can be imposed to secure their protection.</p> <p>Thus the policy refers to <i>protected</i> woodland, trees and hedgerows, not all trees.</p>	No change
3744	Howard Sharp & Partners LLP (Jonathan Harbottle)	add 'materially' into policy relating to harm as otherwise all development could potentially have an adverse effect when next to a wildlife site - should be balanced against any mitigation measures (and/or improvement) offered as part of any scheme	Policy already allows for this. It states that development will not be permitted unless it can be demonstrated that ' <i>Adverse effects can be satisfactorily minimised through mitigation and compensation measures to maintain the level of biodiversity in the area.</i> '	No change
NSO/0082	Herts & Middlesex Wildlife Trust	<p>Herts &amp; Middlesex Wildlife Trust strongly supports Policy DM6. We are pleased to note the particular references to County Wildlife Sites and LNRs, alongside SSSIs. We also support the reference to BAP species alongside protected species, which should be adequately protected in the context of development. We recognise that in certain cases, development affecting any of the listed important sites or species can be made acceptable if appropriate and sufficient mitigation and compensatory provision is made. This should remain a last resort however, when alternative sites are not available and the justification for development is strong.</p> <p>We are pleased to see that key biodiversity areas (described in the Herts local BAP) have been reflected for particular defence ("no net loss of biodiversity value"). However, it is our view that the Council should strive for no net loss of biodiversity in development as a whole, through robust mitigation and compensation of any harm to biodiversity interests, and management and enhancement of habitats, either on the development site or nearby.</p> <p>We strongly welcome the fact that 'development must conserve, enhance and, where appropriate, restore biodiversity. We are pleased to see references to: compensation for habitat loss; provision for habitat management; maintaining the integrity of networks; and enhancing existing habitats and networks.</p> <p>We welcome the reference in section 8.0 to Green Infrastructure, and the further guidance to developers offered in this section.</p>	<p>Support noted.</p> <p>Noted. DM6 sets out that development must conserve, enhance and where appropriate restore biodiversity .... and already refers to compensation.</p> <p>Support noted</p> <p>Support noted</p>	
NSO/0045	Environment Agency	<p>8.0 This section should be renamed Biodiversity, Trees, Woodlands, Watercourses and Landscaping. This is because the section is the logical place to add a policy on enhancing water courses and carrying out the goals of the Water Framework Directive (WFD).</p> <p>8.2 To ensure that this document helps deliver the aims of the WFD and the Natural Environment White Paper we suggest the following alterations to the text in paragraph 8.2: "...It is important that those not covered by designations are retained, protected and wherever possible added to, since pressure for development</p>	<p>Agreed.</p> <p>Agreed.</p>	<p>Title 8.0 Biodiversity, Trees, Woodlands, <u>Watercourses</u> and Landscaping</p> <p>Paragraph 8.2 Woodlands, trees and hedgerows are important contributors to biodiversity and may be protected by wildlife or conservation designations, Tree Preservation Orders or the Hedgerow Regulations. It is important that</p>

		<p>will increasingly threaten trees, woodland, hedgerows, watercourses and their surrounding habitats... Authorities are also obliged to enhance wildlife and landscapes under the Natural Environment and Rural Communities Act 2006, the Water Framework Directive and the Natural Environment White Paper.”</p> <p>8.4 We support this paragraph.</p> <p>8.11 We would suggest this paragraph is altered to: “... Applications should be accompanied by sufficient information to assess the impact of the proposed development on any protected species, trees, woodland or priority habitat...”</p> <p>8.16 We suggest this paragraph is altered to the following. This is to ensure that all opportunities to for fill the council's obligations under the WFD are taken. “The council will support measures identified in the Thames River Basin Management Plan, measures identified in management plans and related status reports for sites of scientific interest, local nature reserves, and other wildlife sites that seek to conserve, enhance and restore biodiversity...”</p> <p>8.18 We suggest the final built in this section is altered to read Landscaping proposals should address: • “The conservation of existing local landscape character and enhance of natural features.” This is to ensure that features such as rivers are enhanced through development.</p> <p>DM6 Biodiversity, Trees, Woodlands and Landscaping We suggest you change this policy to reference priority habitats rather than the UK Biodiversity Action Plan. This better reflects the language used in the Natural Environment White Paper.</p> <p>A sub heading should be added hear on Rivers stating any development adjacent to, over or in a watercourse the developer needs to take into consideration WFD requirements and opportunities outlined in the Thames RBMP. All developments should seek to improve the biodiversity of the site and contribute towards the riparian corridor's ability to be used by migrating species.</p>	<p>Support Noted</p> <p>Agreed</p> <p>Agreed that reference to Thames River Basin be included but suggested wording not suitable.</p> <p>Agreed.</p> <p>Refers to first paragraph. No change required.</p> <p>Agreed</p>	<p>those not covered by designations are retained, protected and wherever possible, added to, since pressure for development will increasingly threaten trees, woodlands, and hedgerows, <u>watercourses and their surrounding habitats</u>. National Planning Policy requires the potential impacts of planning decisions on biodiversity, landscape, trees and geological conservation to be fully considered. Authorities are also obliged to enhance wildlife and landscape under the Natural Environment and Rural Communities Act 2006, <u>the Water Farmework Directive and the Natural Environment White Paper</u>.</p> <p>No change</p> <p>Paragraph 8.11</p> <p>Applications should be accompanied by sufficient information to assess the impact of the proposed development on any protected species, trees or woodland <u>or priority habitat</u>.</p> <p>Paragraph 8.16</p> <p>The Council will support measures identified in management plans (<u>including the Thames River Basin management Plan</u>) and related status reports for Sites of Special Scientific Interest, Local Nature Reserves and other wildlife sites that seek to conserve, enhance and restore biodiversity.</p> <p>Paragraph 8.18 final bullet point:</p> <ul style="list-style-type: none"> <li>• the conservation of existing local landscape character <u>and enhance natural features</u>.</li> </ul> <p>Additional wording added to DM6</p> <p><u>Watercourses</u></p> <p><u>Any development adjacent to, over or in a watercourse needs to take into account consideration of the Water Framework Directive requirements and opportunities outlined in the Thames River Basin Management Plan. All developments should seek to improve the biodiversity of the site and contribute towards the riparian corridor's ability to be used by migrating species.</u></p>
649	Herts Biological Records Centre	<p>This is a strong policy which we welcome. The wording gives effectively the same protection to SSSIs as it does Wildlife Sites, and whilst this is ecologically beneficial it may not reflect the weighting attached to the hierarchy of sites as outlined within the draft NPPF and existing PPS9 etc. However, if tested these at Inquiry distinctions would be made and considered at the time. However, if there is no presumption in favour of retaining Wildlife Sites, there is little point in recognising them in planning</p>	<p>Support noted. Wording may have to be changed following the publication of the final NPPF.</p>	<p>No change</p>

		<p>terms at all, so we support the existing wording.</p> <p>We support the references to management which, although not always within the control of development management, is fundamental to the retention of a site's interest.</p> <p>We support the recognition of the importance of protected species, notwithstanding the separate legislation which helps to protect them. They ARE a material consideration in planning when proposals are known to have a potentially detrimental affect on them. We do not consider their inclusion here represents a specific policy relating to protected species, which previous guidance has stated is not required given their statutory protection.</p> <p>We support the references to hedgerows, particularly where they meet the criteria of the Hedgerow Regs. However, these do not apply to garden hedgerows, which may have become garden hedgerows by virtue of the development proposals. However, we do not consider this does not preclude them from being able to meet the ecological criteria for important hedgerows; where they are located or what they may come to represent is not an ecological issue.</p> <p>In the first paragraph under Trees, Woodland etc. we suggest the inclusion of ...nature conservation features such as veteran trees and orchards.</p> <p>Should the term Wildlife Site be included / explained within the Glossary Appendix 4, given that both SSSIs and LNR's are? Also Green Infrastructure, although this is explained within the text of Section 8 Biodiversity, Trees, Woodland and Landscaping.</p>	<p>Support noted</p> <p>Support noted</p> <p>Noted</p> <p>Although orchards and veteran trees are not specifically mentioned in this paragraph the current policy would include both as technically they are trees, To add 'such as' in policy may exclude other forms of features.</p> <p>Agreed</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p> <p>Glossary</p> <p><a href="#">Wildlife Site</a>  <a href="#">A non-statutory designation for sites of substantive nature conservation, geological or geomorphological value, as identified in the 'Habitat Survey for Three Rivers' carried out by the Herts and Middlesex Wildlife Trust</a></p> <p><a href="#">Green Infrastructure</a>  <a href="#">Networks of green spaces and natural elements including open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage, heritage assets, earth science interests and open countryside</a></p>
Natural England	SCO/0057	<p>DM6 Biodiversity, Trees, Woodlands and Landscaping</p> <p>We support the policy objectives for conserving, enhancing and restoring biodiversity within this section.</p> <p>Paragraph 8.2: PPS9 not only requires that potential impacts on biodiversity and geology are fully considered, it also requires that England's wildlife and geology is conserved, enhanced and restored wherever possible. Under the NERC Act 2006, Local Authorities must conserve wildlife and landscape as well as seeking opportunities for enhancement. We would therefore recommend that the relevant sentences are rephrased to reflect these important distinctions.</p> <p>Paragraph 8.11: Developers should have regard to the potential impact of development proposals on biodiversity, trees and woodlands from the outset. We would recommend that potential cumulative impacts are considered as part of this process.</p> <p>We fully support the Council requiring ecological survey information to be</p>	<p>Support noted</p> <p>Paragraph already states that</p> <p><i>Authorities are also obliged to conserve and enhance wildlife and landscape under the Natural Environment and Rural Communities Act 2006,</i></p> <p>Agreed</p> <p>Support noted</p>	<p>Paragraph 8.11  Developers should have regard to the potential impacts on biodiversity, trees and <a href="#">woodlands and watercourses</a> from the outset. <a href="#">This may include cumulative impacts of development.</a> Where <a href="#">it is considered that a habitat/species development is likely to impact on species or habitat that</a></p>

		<p>submitted at the time of the application however suggest that the relevant paragraph is rephrased slightly, from:  'Where development is likely to impact on species or habitat that is protected under European or Statutory legislation, the council will require survey information to be submitted at the time of the application'  to (or similar): 'Where it is considered that a habitat/species protected under European or Statutory legislation could be affected by development, the council will require adequate survey information to be submitted at the time of the application together with an assessment of the potential impacts and appropriate mitigation/compensatory measures. The surveys should be undertaken and carried out by competent persons and at appropriate times of year'.  Provision of this information at the time of the application will enable the council to fully assess the impacts of development on biodiversity and to fulfil their legal duties under various pieces of legislation including the Conservation of Habitats and Species Regulations 2010 and the NERC Act 2006.</p> <p>Paragraph 8.15: When considering development proposals the council should also take into account habitats and species listed on the UK Biodiversity Action Plan (UKBAP) as well as the Hertfordshire BAP.</p> <p>DM6: We recommend that the Hertfordshire BAP is included in the first paragraph, so as to be consistent with the preceding text.</p> <p>Development should result in no net loss in biodiversity across the district as a whole and not just in the areas identified. We suggest that the paragraph is rephrased to say 'Development should result in no net loss of biodiversity. The following areas have been highlighted as key areas for biodiversity within the Hertfordshire Biodiversity Action Plan'.</p> <p>We suggest that a paragraph is also added stating the importance of linked habitats in allowing species to adapt and respond in the face of climate change. Development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape.</p> <p>Consideration of alternatives and avoidance measures should always be the first port of call where important habitats/species could be affected by development. Where this is not possible, mitigation measures should be formulated to minimise/reduce impacts. Compensatory measures should only be considered as a last resort in the event that adverse impacts cannot be mitigated or avoided. We therefore suggest that a paragraph is inserted along the lines of the following with reference made to the forthcoming Design SPD and Green Infrastructure and Landscape SPD:  In the first instance development should seek to avoid impacts on designated sites and important habitats/species through sensitive design and consideration of alternatives. Proposals should seek to incorporate measures for biodiversity enhancement and Green Infrastructure delivery</p>	<p>Agreed. paragraph 8.11 to be amended to incorporate suggested changes</p> <p>Agreed. Wording change to include UKBAP</p> <p>Agreed</p> <p>Agreed that there should be no net loss of biodiversity value across the District. Wording changed.</p> <p>Agreed. Paragraph added.</p> <p>Agreed. Changes made.</p>	<p>is protected under European or Statutory legislation <u>could be affected by development</u>, the Council will require <u>adequate</u> survey information to be submitted at the time of the application <u>together with an assessment of the potential impacts and appropriate mitigation/compensatory measures. The surveys should be undertaken and carried out by competent persons and at appropriate times of the year.</u> Herts Biological Records Centre is able to provide information on species data for a development site and further information is also available from Herts and Middlesex Wildlife Trust.</p> <p>Paragraph 8.15  When considering development proposals, the Council will take account of the <u>UK biodiversity Action Plan</u>, Hertfordshire Biodiversity Action Plan and other relevant information.</p> <p>DM6  Development that would affect a Site of Special Scientific Interest, Local Nature Reserve, County Wildlife Site or protected species under UK or European law, or identified as being in need of conservation by the UK Biodiversity Action Plan <u>or the Hertfordshire Biodiversity Action Plan</u>, will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site, unless it can be demonstrated that:</p> <p>DM6 paragraph 2  Development should result in no net loss of biodiversity value <u>across the District as a whole. The following areas have been highlighted as key areas for biodiversity within the</u> <del>in any of the following key biodiversity areas as identified in the Hertfordshire Biodiversity Action Plan</del></p> <p>Additional wording added to DM6  <u>Linked habitats are important in allowing species to adapt and respond to circumstances. Development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape.</u></p> <p>Additional wording added to DM6;  <u>In the first instance development should seek to avoid impacts on designated sites and important habitats/species through sensitive design and consideration of alternatives. Proposals should seek to incorporate measures for biodiversity enhancement and Green Infrastructure delivery wherever possible.</u></p>
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SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support Noted	
3788	Loudwater (Troutstream) Estate LTD	Paragraph 5 of Appendix 2 of the existing Local Plan stipulates clearly that as good practice the landscaping scheme should be considered an integral part of the design process (of residential development) from the outset. . We are unable to find any similar provision in the Plan Document. Notwithstanding the Loudwater Estate is a conservation area and its trees therefore protected we are concerned that policies should in general support the preservation of tree cover, particularly in the context of the landscaping of any new development or extensions of existing houses. We have experienced in recent years some flagrant disregard in such respects, so anything the Council can do to strengthen the preservation of the existing environment in this particular respect will be appreciated.	paragraph 8.17 states that: <i>Landscaping of new development should be considered as an integral part of the design process.</i>  No change required.	No change

DM7 Landscape Character				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
CU/0389		Stopping London Underground destroying trees along the railway line	noted	No change required
NSO/0078	Chilterns Conservation Board	<p>Although this policy is supported the Board considers that it would be useful to add reference to the 'type' or 'form' of development in the first bullet point under the Chilterns AONB part, because in some instances the siting, design or external appearance do not address the likely implications of some types of development.</p> <p>The Board particularly welcomes the references to the Chilterns Buildings Design Guide and Supplementary Technical Notes on local building materials.</p>	<p>Support noted. Agreed.</p> <p>Support noted</p>	<p>DM7 first bullet point</p> <ul style="list-style-type: none"> <li>Fail to conserve or enhance the special landscape character and distinctiveness of the AONB by reason of the siting, design or external appearance of, <u>or the type or form of</u> development</li> </ul>
649	Herts Biological Records Centre	<p>HBRC suggest the inclusion of orchards within the Local Context first paragraph, within the wildlife habitats sentence. These horticultural activities were a particular feature of SW Herts and in places their survival remains so today.</p> <p>We support the reference to the need to demonstrate new management proposals when existing management of an important feature may be affected by a particular development proposal.</p> <p>TRDC will need to be robust in their interpretation of benefit to AONB and Landscape Regions if, as is currently stated, the council will, or are likely to, support development in such areas.</p>	<p>Agreed</p> <p>Support noted</p> <p>Noted. Change to first paragraph to strengthen policy.</p>	<p>Paragraph 9.4, last sentence</p> <p>Wildlife habitats such as meadows, woodlands, hedgerows, <u>orchards</u> and wetlands are valued components of the landscape and have their own special management requirements.</p> <p>DM7 first paragraph. In considering proposals for development within or near the Chilterns Area of Outstanding Natural Beauty, the Council will seek to support development unless <del>it can be demonstrated that</del> the proposal would:</p>
SCO/0057	Natural England	<p>DM7 Landscape Character Paragraph 9.6: It is considered that conservation and enhancement of the AONB should both be considered. We therefore suggest rephrasing the paragraph to 'New development should conserve and enhance the special character and natural beauty of the AONB'</p> <p>DM7: Recommend that 'Contribute to delivery of Green Infrastructure' is added to the list of proposals that the council is likely to support.</p> <p>Paragraph 9.13: As for paragraph 9.6.</p>	<p>Agreed.</p> <p>Agreed. Further bullet point added.</p> <p>See comment for paragraph 9.6 above.</p>	<p>Paragraph 9.6 New development should <del>either</del> conserve <u>and</u>/or enhance the special character and natural beauty of the AONB.</p> <p>DM7 In considering proposals for development within or near the Chilterns Area of Outstanding Natural Beauty, the Council will seek to support development unless it can be demonstrated that the proposal would:</p> <ul style="list-style-type: none"> <li>Fail to conserve <u>and</u>/ or enhance the special landscape character and distinctiveness of the AONB by reason of the siting, design or external appearance of, <u>or the type or form of</u> development</li> <li>Detracts from the setting of the AONB and has an adverse impact on views into and out of the area</li> <li>Detracts from the public enjoyment of the AONB landscape.</li> </ul> <p>In all landscape regions, the Council will require proposals to make a positive contribution to the surrounding landscape and are likely to support proposals that:</p> <ul style="list-style-type: none"> <li>Lead to the removal or a reduction in the impact of existing structures and land uses that are detrimental to the visual quality of the landscape</li> <li>Enhance public access and recreation opportunities without detriment to the landscape</li> </ul>

				<p>or wildlife</p> <ul style="list-style-type: none"> <li>• <b>Contribute to delivery of Green Infrastructure</b></li> </ul> <p>Contribute to the measures identified in the Hertfordshire Landscape Strategy 2001 to strength, reinforce, safeguard, manage, improve, restore and reconstruct landscapes.</p>
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted	
3788	Loudwater (Troutstream) Estate LTD	Policy DM7 on page 32 states in connection with the Chilterns AONB which abuts the Loudwater Estate that in considering proposals for development within or near to the Chilterns AONB the Council will seek to support development unless it can be demonstrated that the proposal would inter alia fail to conserve or enhance the special landscape character and distinctiveness of the AONB by reason of its siting, design and external appearance of development. We submit that this wording creates a different emphasis from Policy N20 of the existing Local Plan at the beginning of which the Council states that it will give priority to conservation and enhancement of existing landscape before going onto state the other yardsticks which have to be reached if development is going to be considered. I understand from my conversation with a member of your department that there is in fact no change in policy, so I would be grateful if you would kindly consider whether your proposed new wording detracts in anyway from your Council's intention not to make any changes	Existing wording considered the most suitable to achieve objectives of the Core Strategy	No change required.

DM8 Flood Risk and Water Resources				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
NSO/0078	Chilterns Conservation Board	The Board supports this policy. However, it is considered that reference could usefully be made to the use of water meters within the measures to be incorporated to ensure efficient use of water resources.	CP1 Overarching policy on Sustainable Development requires CPLAN Energy Statement and Sustainability Checklist which incorporates measures for water conservation. Both the Core Strategy and DMP DPD refer to the Building Futures Guide re water efficiency.	No change
637	Merchant Taylors Company	The overall policy is supported, however it is considered that an element of flexibility should be incorporated into the requirements for new developments to ensure that the measures required are appropriate and feasible in relation to the scheme, and that consideration is also given to the balance of overall sustainability measures provided (ie. through a BREEAM or Code for Sustainable Homes rating).	Policy considered sufficiently flexible.	
3744	Howard Sharp & Partners LLP (Jonathan Harbottle)	too prescriptive in mentioning 8m buffer - not always the case and site specific circumstances need to be taken into account - should mention any site specific measures or design requirements as required following consultation with the EA  not saying that will not allow any development where currently zones 2 and 3 but even so the policy should be cast positively to make it clearer that opportunities to reduce existing flood risk to properties should be encouraged and that innovative privately funded flood alleviation measures will be supported	See representation from Environment Agency re bufferzone  No change required.	See representation from Environment Agency re bufferzone
NSO/0045	Environment Agency	10.2 A paragraph similar to 10.2 covering Flood Zone 3b should be added here. We would suggest the following wording: "Flood zone 3b (the highest level of flood risk) has been defined by our SFRA. New built footprint will not be acceptable in this flood zone. Redevelopment of existing built footprint in Flood Zone 3b will only be considered if the development is of a compatible use class (as defined in table D.3 in Planning Policy Statement 25- Development and Flood Risk (PPS25)) and does not increase flood risk elsewhere."  This is important to include as it will steer new development out of the areas of highest flood risk and ensure that flood risk is not increased to others by reducing available flood storage and reflects Flood Risk Objective 4 of your Level 1 SFRA. 10.4 We support this paragraph. 10.4 We support this paragraph. 10.5 We support this paragraph. 10.7 We support this paragraph. 10.8 We support this paragraph. 10.10 We support this paragraph. 10.11 We support this paragraph.  10.13 We have not notified you of any designated critical drainage areas. It would there for be appropriate to remover the sentence in this paragraph referring to them.  10.14 We support this paragraph on the whole but suggest it is improved by removing "unless there are over riding reason to prefer different location" from the first bullet point. All developments should be designed with the moor vulnerable uses located in the areas of lowest flood risk, this stance is supported by PPS25 (paragraph D6).  10.15 This paragraph should be amended to "...Fore development in all areas, Sustainable Drainage Systems should be implemented to reduce run off from the site."	Agreed.  Support noted.  Agreed.  Support noted. No change  Agreed. In consideration of new requirements for SudS in new development.	Additional paragraph to be added under 10.2  <u>Flood zone 3b (the highest level of flood risk) has been defined by our SFRA. New built footprint will not be acceptable in this flood zone. Redevelopment of existing built footprint in Flood Zone 3b will only be considered if the development is of a compatible use class and does not increase flood risk elsewhere.</u>  Following sentence removed from paragraph 10.13: <del>A FRA is also likely to be required for any development other than minor development in a designated critical drainage area which has been notified to the Local Planning Authority by the Environment Agency.</del>  10.15 sentence changed to;  For developments in all areas, Sustainable Drainage

		<p>There are many different kinds of Sustainable Drainage Systems (SuDS) including both infiltration and non-infiltration measures. It is always technically possible and appropriate to incorporate the use of SuDS in new developments.</p> <p>10.16 This should be strengthened by removing “where possible” and altering the wording to..... “...should seek to include river restoration. Where culverts are present on site then developers should seek to remove them.”</p> <p>10.17 We support this paragraph.</p> <p>10.18 We support this paragraph. In particular the reference to early pre-application discussions with the Environment Agency.</p> <p>DM8 Flood Risk and Water Resources The second paragraph is a very high bar (as flooding can be caused by unpredictable sources like mains water leaks). We would suggest that it is altered to: “New development will be located and designed to minimise flood risk to present and future users as well as ensuring that flood risk is not increased and is where possible reduced off site.”</p> <p>We would strongly advise you alter policy DM8 to include that the minimum of a five meter wide buffer zone is provided to any ordinary watercourses.</p> <p>On 6 April 2012, when the next phase of the Flood and Water Management Act 2010 is implemented, responsibility for regulating activities on ordinary watercourses transfer from the Environment Agency to lead local flood authorities (in your case Herts CC). They will be responsible for ensuring that development is set back from ordinary watercourses and this policy will assist them in doing so. We support bullet point 1. We welcome the council supporting water efficiency; however this policy could go further by making a commitment all new residential buildings achieving a water use of 105 litres/head/day (l/h/d) or less. Sub-Bullet point 5 should be strengthened by removing “where possible” and altering the wording to..... “...should seek to include river restoration. Where culverts are present on site then developers should seek to remove them.”</p>	<p>Agreed. Policy wording changed to provide some flexibility.</p> <p>Support noted</p> <p>Support noted</p> <p>Agreed.</p> <p>Agreed. Paragraph changed re bufferzone.</p> <p>Noted. See response to HCC representation</p> <p>Support noted Noted. No change</p> <p>See previous comment on paragraph 10.16</p>	<p>Systems should be implemented to reduce run off from the site if technically possible and appropriate.</p> <p>10.16 Where appropriate developers will be required to show that any flood protection and mitigation measures which may be necessary do not have an unacceptable impact on nature conservation, landscape, recreation or other important issues. New development adjacent to water courses should seek to include river restoration and de-culverting <del>where possible</del>.</p> <p>DM8 second paragraph <u>New development must be located and designed to minimise flood risk to present and future users as well as ensuring that flood risk is not increased and is, where possible, reduced off site.</u></p> <p><del>New development must be located and designed to prevent present and future users from being exposed to the risk of flooding.</del></p> <p>DM7 Development should normally be set back from any watercourse with a minimum 5m wide bufferzone to prevent any significant impact from flooding.</p>
649	Herts Biological Records Centre	<p>We support the recognition of water resources and flooding as an issue which must be considered within planning. Should not SuDS be specifically referred to within the policy, namely as a feature of a development proposals that would be required / supported by TRDC. The role of natural floodplains in playing an important role in ameliorating local flooding issues should also perhaps be outlined.</p>	<p>Policy CP1 of the Core Strategy states that <i>All development in Three Rivers will contribute to the sustainability of the District, this means taking into account the need to ;</i> <i>c) Minimising flood risk through the use of Sustainable Drainage Systems</i> Additional text regarding SUDS has been added as detailed in response to Hertfordshire County Council the Lead Local Flood Authority</p>	
SCO/0057	Natural England	<p>DM8 Flood Risk and Water Resources We welcome objectives for enhancement and restoration of river corridors and the requirement that new developments should incorporate measures for efficient use of water resources. We consider that PPS9 and Core Strategy Strategic Objective S9 are relevant to this policy.</p>	<p>Support noted.</p>	
SCO/0008	Dacorum Borough Council	<p>We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.</p>	<p>Support noted</p>	

SCO/0006	HCC Spatial and Land Use Planning	<p>The Flood and Water Management Act 2010 created Lead Local Flood Authorities (LLFA) who have a range of new duties and powers relating to the management of flood risk from surface water, ordinary water courses and groundwater. The county council is the LLFA for Hertfordshire. Requirements set out within the Act include the LLFAs having a duty to prepare a Local Flood Risk Management Strategy for their area in consultation with the relevant Risk Management Authorities (which includes district councils). In addition LLFAs will need to make arrangements for the determination of the arrangements for surface water drainage in new development through the establishment of SUDs Approval Bodies. As a consequence, requirements for, and the responsibilities for flood management and local guidance on the design and implementation of flood management schemes have, or will be subject to change in the near future.</p> <p>It is not yet clear what form, or how these requirements will play out within Hertfordshire. However, Policy DM8 must be flexible enough to accommodate these changes and direct developers towards the most appropriate information on standards and towards the appropriate approval body.</p> <p>Ongoing engagement between the LLFA and Three Rivers Council will be required, and the county council will work with Three Rivers District Council to ensure this is achieved. Further guidance on SUDS will be included in the Hertfordshire Building Futures Guide later this year.</p> <p>As a starting point, it is suggested that the following changes are incorporated into the supporting text. <u>Para 10.17</u></p> <p>In some cases, developers will be required to contribute to the delivery of flood risk management schemes as identified in the Three Rivers Strategic Flood Risk Assessment (2007), <b>and other relevant plans such as the Local Flood Risk Management Strategy for Hertfordshire</b>, to improve flood awareness and emergency planning in partnership with the County Council <b>as Lead Local Flood Authority</b>, the Environment Agency and other <b>appropriate bodies</b>.</p> <p><u>Para 10.18</u></p> <p>Applicants are advised to refer to national policy for further information on flood risk and development and to enter into early pre-application discussions with the Council, <del>and</del> Environment Agency <b>and SUDS Approval Body (SAB) where required</b>. Further guidance on ways to conserve water <b>and deliver SUDS</b> are continued in Building Futures: A Hertfordshire Guide to promoting sustainability in development (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and Roads in Hertfordshire – Highway design Guide (<a href="http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherts/">http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherts/</a>).</p>	<p>Noted</p> <p>Agreed.</p> <p>Agreed</p> <p>Agreed</p>	<p>Paragraph 10.17 In some cases, developers will be required to contribute to the delivery of flood risk management schemes and facilities as identified in the Three Rivers Strategic Flood Risk Assessment (2007) <u>and other relevant plans such as the Local Flood Risk Management Strategy for Hertfordshire, to enhance and restore river corridors and to improve flood awareness and emergency planning, in partnership with the County Council as lead Local Flood Authority, the Environment Agency and other appropriate bodies.</u></p> <p>Paragraph 10.18 Applicants are advised to refer to national policy for further information on flood risk and development and to enter into early pre-application discussions with the Council <del>and</del> the Environment Agency <u>and SUDS Approval Body (SAB) where required</u>. Further guidance on ways to conserve water <u>and deliver SUDS</u> are continued in Building Futures: A Hertfordshire guide to promoting sustainability in development (<a href="http://www.hertslink.org/buildingfutures">http://www.hertslink.org/buildingfutures</a>) <u>and Roads in Hertfordshire – Highway Design Guide</u> (<a href="http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherts/">http://www.hertsdirect.org/services/transtreets/transplan/infdev/roadsinherts/</a>).</p>
CU/0193	Rickmansworth & District Residents' Association	<p>The Association's support is conditional upon more work being done. The Council should acknowledge that the Environment Agency flood maps are a crude indication of risk, being primarily based on contours and the historic maps of water courses. They do not necessarily indicate where the flood risk has been substantially reduced, such as by the absorption of minor watercourses into the main drainage system, or increased, as where choke points drastically increase the risk of flooding upstream. As an example of the latter, the area upstream of Church Street is in far greater risk of flooding from the town ditch than those areas downstream, because of the choke point effect of the culverts under Church Street and Bury Lane.</p>	<p>Noted. The Environment Agency has updated their SFRA which reviews flood zones using local information. No change.</p>	

DM10 Waste Management				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
NSO/0045	Environment Agency	DM10 Waste Management A bullet should be added here to say new development will only be supported where: "the site is located outside of an Source Protection Zone 1" This is because we would object to any new waste management facilities in an source protection zone 1 in line with GP3. This is in order to protect potable groundwater abstractions.	This only applies to applications for waste management facilities which are dealt with by the County Council and is covered by policies in the County's Waste Management Core Strategy. No change.	No change
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted.	
SCO/0006	HCC Spatial and Land Use Planning (Minerals & Waste)	Minerals and Waste  The Minerals and Waste Planning Authority supports the inclusion of this policy and its aims. The policy incorporates the suggestions made by Hertfordshire County Council in previous representations submitted to the district council.  However, the county council would like to see the following statement incorporated into the supporting text:  "A site waste management plan (SWMP) is required by law for all construction projects that are worth more than £300,000. This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Projects over £500,000 may require further information."  The first sentence in paragraph 12.8 should be amended to read as follows:  "The amount of waste produced in Hertfordshire is approximately 23 million tonnes per year, around a quarter of which (550,000 tonnes) over 500,000 tonnes is local authority collected (household waste)."	Support noted  Agreed and additional information added to Further Guidance Section.  Agreed.	DM10 new paragraph:  <u>12.11</u>  <u>A Site Waste Management Plan (SWMP) is required by law for all construction projects that are worth more than £300,000. This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Projects over £500,000 may require further information.</u>  Further Information <u><a href="http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/">Site Waste Management Plans: Waste &amp; Resources Action Programme Guidance</a></u> <u><a href="http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/">http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/</a></u>  Paragraph 12.8  The amount of waste produced in Hertfordshire is approximately 23 million tonnes per year, around a quarter of which (550,000 tonnes) over 500,000 tonnes is local authority collected (household waste).

DM11 Open Space, Sport and Recreation Facilities and Children's Play Space				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
CU/0389		Refuse any applications which remove or reduce children's play space	Policy sets out the criteria which will have to be met if an application is likely to result in the loss or partial loss of space. No change required	No change
3673	Herts Constabulary Crime Prevention Design Service	Section 13 considers open spaces and children's play areas and we have been consulted by the Council in relation to anti-social behaviour and the general design of the spaces together with car parking around the open spaces. Whilst DM11 does not specifically mention safety and security I feel there should be a link to CP12 in view of the requirement to reduce criminality.	Agreed. CP12 added to Policy Links section.	DM11 Policy Links section Related Core Strategy Policies CP1: Overarching Policy on Sustainable Development CP8: Infrastructure and Planning Obligations <a href="#">CP12 Design of Development</a> PSP1: Development in the Principle Town (Rickmansworth) PSP2: Development in the Key Centres (South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden, Garston and Mill End) PSP3: Development in Secondary Centres (Kings Langley, Carpenders Park, Eastbury, Maple Cross, Moor Park, Oxhey Hall) PSP4: Development in Villages (Bedmond and Sarratt)
NSO/0087	Sport England	<p>Turning now to policy DM11, while Sport England is supportive of the policy's aims, we have some concerns as to its detailed interpretation. The title of the policy and its opening sentence clearly state that its scope is intended to cover Open Space, Sport and Recreation Facilities and Children's Play Space. The policy then goes on to identify five circumstances where it might be permissible to allow the whole, or partial loss of existing open space, sport and recreation facilities. Each particular circumstance makes slightly different reference to what is affected. So for example while the first circumstance talks of provision of open space, sport and recreation facilities, circumstance 4 simply looks at whether the proposal would create a deficiency in open space. Each circumstance is linked by the word "or" rather than "and" and as such it is understood that proposals are acceptable if one as opposed to all of the circumstances are met. It is unclear whether each circumstance pertains to the intended scope of the policy, or whether it simply covers the specific area that it mentions.</p> <p>This concern is best illustrated by way of an example. A proposal might involve the loss of a playing field (which would presumably be classed as a sport and recreation facility) where the overall level of open space in that locality might still be acceptable against circumstance 4. Strict interpretation of the policy suggests that meeting this one circumstance would mean that the development would be acceptable, even if the proposal resulted in a shortfall of playing pitches. Clearly this would not be acceptable to Sport England.</p> <p>Sport England expects to see development plan policies on the protection of playing field offering at least the equivalent protection as paragraph 15 of PPG17, unless local circumstances dictate the a different approach should prevail. Sport England considers that policy DM11 is worded in such a way that it fails to offer sufficient protection to playing fields, and therefore wishes to object.</p> <p>I trust you will give our concerns your fullest consideration. We would be happy to work with the Council to consider amendments to Policy DM11 which addressed our concerns prior to submission stage.</p>	<p>Agreed. Additional wording to be added to clarify that the bullet points in the first part of policy DM11 applies to open space, sport and recreation facilities.</p> <p>The changes made to the policy above addresses this.</p> <p>The changes made to the policy above addresses this.</p> <p>Suggestions for amendments should have been made at this stage.</p>	<p>DM11 Development proposals which result in the whole or partial loss of existing open space, sport and recreation facilities will only be permitted where:</p> <ul style="list-style-type: none"> <li>The proposed development includes provision for open space, sports and recreation facilities of sufficient benefit to recreation provision to outweigh the loss or</li> <li>Alternative provision of equivalent or better quality is made for the catchment area served by the open space, <a href="#">sports and recreation facilities</a> in an accessible location served by sustainable modes of transport or</li> <li>The proposal is ancillary to an existing leisure use serving the catchment area or</li> <li>A deficiency of open space, <a href="#">sports and recreation facilities</a> is not created through its loss, now or over the plan period or</li> <li>It can be demonstrated that the users would benefit more from the improvement of the facilities on the open space, <a href="#">sports and recreation facilities</a> despite a loss of part of the site.</li> </ul>
NSO/0078	Chilterns Conservation Board	The Board supports this policy as drafted and particularly welcomes the reference to resisting development on commons.	Support noted	
649	Herts Biological Records Centre	HBRC support the approach to development on Commons within the Policy, many of which have a considerable biodiversity importance. We support the approach to the design of Open Space in respect of biodiversity interests.	Support noted	
SCO/0057	Natural	DM11 Open Space, Sport and Recreation Facilities and Children's Play Space	Agreed. Reference to CP9 to be included in related Core Strategy	DM11

	England	25 We recommend that Core Strategy Strategic Objective CP9 is referenced within the policy links section as provision of open space, sport and recreation facilities and children's play space could all potentially help contribute to delivery of Green Infrastructure.	Policy section	Policy Links Related Core Strategy Policies CP1: Overarching Policy on Sustainable Development CP8: Infrastructure and Planning Obligations <a href="#">CP9: Green Infrastructure</a> <a href="#">CP12: Design of Development</a> PSP1: Development in the Principle Town (Rickmansworth) PSP2: Development in the Key Centres (South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden, Garston and Mill End) PSP3: Development in Secondary Centres (Kings Langley, Carpenders Park, Eastbury, Maple Cross, Moor Park, Oxhey Hall) PSP4: Development in Villages (Bedmond and Sarratt)
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted.	No change



		<p>This can work well with D1 but generally cannot work with D1h class (Can you see a synagogue and mosque share the same facility ?) Generally each religious group must have its own centre.</p> <p>If these points are introduced into the plan then future problems will be avoided in trying to find facilities or sites after they have disappeared, as it is put in the London Plan ---- "Making an area more than just a place to live."</p> <p>I would welcome the opportunity to meet with the inspector if it would be helpful regarding the D1-h aspect</p> <p>Also, we would like to put in a submission in relation to the provision of Social and Community Facilities in the following terms:</p> <p>Although we acknowledge that the 'London Plan' does make provision for places of worship, which we are happy to rely upon should a future need arise, we would still request that the Revised SPD include a specific reference to 'places of worship' for purposes of consistency and to ensure that the future provision of such facilities within the opportunities area, if needed, is not precluded by omission.</p> <p>This is consistent with Government Guidance as follows: Paragraph 14 of PPS1 which states: "...The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens". Paragraph 16 goes on to say: "...Plan policies should...take into account the needs of all the community, including particular requirements relating to...religion".</p> <p>Paragraph 126 of the draft National Planning Policy Framework (NPPF) states that in order to deliver the facilities and services that the community needs, planning policy should: "...plan positively for the provision and integration of community facilities (such as...places of worship)...to enhance the sustainability of communities and residential environments".</p> <p>We would be grateful if you could take these comments into consideration before adopting the Revised SPD.</p>	<p>The term 'faith facilities' is used rather than 'places of worship' so as not to limit the definition.</p> <p>NPPF Published</p>	<p>No change required</p> <p>No change required</p> <p>See changes made re publication of NPPF.</p>
SCO/0017	HCC Property and Technology	<p>3.0 Policy DM12</p> <p>This policy seeks to protect existing facilities or seek re-provision unless it is proven that the facility is no longer required. Where new provision is sought the only criteria in the policy is that the facility should be accessible by sustainable methods of transport. It would be helpful if there was provision in this policy which links back to policy DM2 so that provision of new schools situated in the Green Belt does not conflict with the Green Belt policies in DM2.</p> <p>An alternative approach would be to include a separate section which offers policies on education sites which would support provision and balance the weight of the Green Belt policies. This policy should reflect the location of education sites in the Green Belt and the ability to enhance existing or provide new schools which would otherwise conflict with the Green Belt policy DM2.</p> <p>An approach to the issue of education sites in the Green Belt might be to include a DM policy on education which could cover GB issues.</p>	<p>Applications for new educational facilities or extension to existing educational facilities within the Green Belt will need to prove 'very special circumstance.' Applications will be assessed against all development plan policies.</p>	<p>No change required</p>

DM13 Parking				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
CU/0389		<p>Future development only granted if off street parking can be provided.</p> <p>More double yellow lines on one side of major roads to keep traffic moving. More wardens to enforce parking restrictions and cars towed away quicker.</p>	<p>The policy sets out the off street parking criteria for development proposals</p> <p>Noted. Does not fall under the remit of planning policy.</p>	<p>No change</p> <p>No change</p>
658	Thrive Homes	<p>Standards for C3 residential (general needs and elderly persons) are excessive for affordable housing, bearing in mind car ownership levels. In most cases, parking provision in affordable housing is provided communally which means that sharing between households can lead to a lower aggregate requirement. Excessive parking standards will contribute to problems of site utilisation/density.</p> <p>Can find no definition of 'mobility' spaces. Is this meant to be standard in Lifetime Homes or BS DD266:2007?</p> <p>Also note that there appears to be no specific standards for parking associated with dwellings designed to full wheelchair standards. Would suggest that probably more important than the 'mobility' proportion suggested.</p>	<p>The Parking Standards in Appendix 3 set out the requirements for C3 Residential (Elderly Person's Accommodation) which have considered the parking for this type of use. Each application will be considered on its own merits. No change required.</p> <p>Appendix 3 refers to 'Parking for Disabled Motorists'. No minimum size has been specified. Additional wording to be added.</p> <p>Appendix 3 states that there is a requirement for 1 disabled parking space for every dwelling built to mobility standards.</p>	<p>No change</p> <p>Additional wording Appendix 3. Parking for Disabled Motorists</p> <p>The parking needs of disabled motorists shall be met in full irrespective of location i.e. where the zonal procedure results in on-site parking restraint, there shall be <i>no</i> corresponding reduction in disabled spaces. <u>The minimum measurements of a disabled space provided off the highway should be 3.2m in width and 4.8m in length. Disabled spaces provided on the highway must comply with the requirements of Hertfordshire Highways Authority. Further guidance on the provision, layout, size of disabled parking spaces will be set out in the forthcoming Parking Standards SPD.</u></p> <p>Table. 1 space for every dwelling built to mobility standards <u>(such as Lifetime Homes).</u></p>
3673	Herts Constabulary Crime Prevention Design Service	<p>Section 15 relates to parking in all its guises but fails to mention the safer parking Park Mark scheme which is a shame as Three Rivers have just had 19 of its car parks accredited under the scheme. The scheme is administered by the British Parking Association with the police jointly assessing car parks and giving the award.</p> <p>Car parking in new developments is a concern as there seems to be a move towards "parking courts" and I would draw your attention to "The Impact of the Design and Layout of Car Parking on Crime and Anti-Social Behaviour" by Dr. Rachel Armitage in where her key recommendations emerging from the research include:</p> <ul style="list-style-type: none"> <li>• There is a clear need for consistent guidance on parking provision within housing developments. This should recommend that, where possible, vehicles should be parked within garages or within the curtilage of the property.</li> <li>• Rear parking courts should be avoided. However, where they are essential, they should be overlooked by nearby housing and be small in size.</li> <li>• Developments must have allocated car parking spaces for visitors and the design and allocation of on-street and communal parking must take care to avoid neighbour disputes.</li> </ul>	<p>Park Mark Safer Parking is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police who look at:</p> <ul style="list-style-type: none"> <li>• Quality management</li> <li>• Appropriate Lighting</li> <li>• Effective Surveillance and</li> <li>• Clean environment</li> </ul> <p>The scheme is managed by the British parking Association (BPA) on behalf of Secured By Design, supported by the Home Office and Government.</p> <p>Agreed that mention of Park Mark should be included in the Design SPD (See paragraph 15.10 – '...further guidance on the design and layout of parking areas will be contained in the Design SPD' as well as further guidance on 'parking courts'.</p>	<p>No change</p>

		<ul style="list-style-type: none"> <li>• Innovative approaches to parking should be well-considered. Residents will often adapt and adjust their parking in ways not intended if parking provision does not provide the necessary convenience.</li> <li>• Designs for garages should ensure that surveillance from the main property is not restricted, sightlines must be maintained and the physical security of these garages should be maximised. CABE and the Design Council have also made comments about parking and Brain Quinn in 2011 following a project completed by CABE found: <ul style="list-style-type: none"> <li>• Allocated resident parking has lower crime than unallocated parking</li> <li>• Allocated visitor parking associated with lower crime</li> <li>• Communal parking experienced higher crime than either on street or in curtilage parking (in line with British Crime Survey)</li> <li>• Properties with garages experienced more burglary than those without</li> <li>• Large or dominant rear parking courts tend to be problematic.</li> </ul> </li> </ul> <p>If the Council are looking to reduce criminality then the above must form part of the considerations when looking at design of residential properties.</p>		
NSO/0029	Theatres Trust	support the Pre Submission stage for Policy DM12 Community, Leisure and Cultural Facilities which supports the provision of cultural facilities although there is no entry in Appendix 3 Parking Standards for sui generis theatres.	It is considered inappropriate to list all the possible uses in Appendix 3 under sui generis. However it is recognised that clarification is needed as to what the Council will do for applications for sui generis applications. Additional row to be added at the end of Car Parking Standards Table of Appendix 3	Appendix 3 Car parking Standards Table Additional row. Use Class <u>Sui generis</u> Description (none) Car Parking Standards <u>To be decided in each case on individual merits.</u>
SCO/0008	Dacorum Borough Council	<p>We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.</p> <p>We welcome the reference in Policy DM13 Parking/Appendix 3 to the continuation of both your existing Local Plan parking standards (rather than a complete revision) and use of a zonal approach to parking provision. It would be preferable if the future update through a proposed Parking Standard SPD is developed in accordance with any emerging countywide standards at that time to ensure a degree of consistency in parking provision across districts. If no such standards arise, we would welcome the opportunity to work with Three Rivers towards developing shared standards.</p>	<p>Support noted</p> <p>Agreed</p>	No change
CU/0193	Rickmansworth & District Residents' Association	The document highlights that Parking space in town centres is frequently used to maximum capacity. Preventing residents of new dwellings from being able to participate in existing controlled parking schemes, as proposed, would prevent an extreme conflict in the use of space between existing residents and occupiers of new residences. The proposals in Paras 15.11 of the document would mean that high density town centre schemes (H 23, 24, 25, 26 and 28) built to parking standards less than those specified in Appendix 3 would be extremely unattractive to buyers and, therefore, would be unlikely to contribute to the continued vitality of the town. The document should be amended to state that applicants should assume that any new high density development within a town centre would have to meet the parking standards laid down in Appendix 3 (C3 Residential), without the zone based reductions.	<p>Supporting text states that only where local streets can be shown to have difficulty in accommodating on street parking will residents of new development not qualify to receive parking permits. The standards set out in Appendix 3 are considered appropriate.</p> <p>Contrary to national policy which states that development in town centre locations should be reduced. Each application will be assessed on its own merits.</p>	No change

DM14 Telecommunications				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
NSO/0078	Chilterns Conservation Board	The Board supports this policy as drafted.	Support noted	No change
649	Herts Biological Records Centre	Consideration could be given within the policy to describing the potential impact on biodiversity assets and the need to minimise or compensate for their impacts if affected.	Policy DM6 looks at the protection of biodiversity assets in the District.  No change	No change
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted	No change
SCO/0006	HCC Spatial and Land Use Planning (Highways)	Highway Authority  Telecommunications masts, cabinets and other equipment are quite often placed on highway land. It is important that their location does not impede free and safe flow of highway users.	Agreed. Bullet point added.	DM14 Telecommunications Proposals for the installation of telecommunications equipment should: <ul style="list-style-type: none"> <li>• Have no significant adverse effect on the external appearance of the building on which, or space in which, they are located</li> <li>• Preserve or enhance the special character and appearance of all heritage assets</li> <li>• Fully explore the possibility of sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures</li> <li>• Fully explore technologies to miniaturise and camouflage any telecommunications apparatus</li> <li>• <b>Does not impede free and safe flow of highway users</b></li> <li>• Be appropriately designed, coloured and landscaped to take account of their setting and</li> <li>• Have no significant adverse impact on the visual amenities of neighbouring occupiers.</li> </ul>

DM15 Residential Moorings				
Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
NSO/0078	Chilterns Conservation Board	The Board supports this policy as drafted.	Support noted	
3744	Howard Sharp & Partners LLP (Jonathan Harbottle)	Moorings should also include floating homes and offices - given the large tracts of water and modern technologies, this type of development will be found more and more over the plan period - it is already successfully happening along the Thames	Amend policy to 'Mooring's	17 <del>RESIDENTIAL</del> MOORINGS  17.5 As <del>residential</del> moorings are not recognised as appropriate development in the Green Belt by national policy, applications for <del>residential</del> moorings outside of the urban areas will have to demonstrate 'very special circumstances'.  DM15 <del>Residential</del> Moorings Proposals for permanent <del>residential</del> use of moorings...
1491		There should not be excessive lengths of residential moorings except where they are now. Say no more than 5 boats in length.	The criteria set out in policy DM15 are considered sufficient to restrict the number of moorings. No change	No change
NSO/0045	Environment Agency	DM15 Residential Moorings We are please that you have included a built point committing to no adverse impact on nature conservation value. In order for us to find this sound a bullet should be added stating that flood risk will not be increased on or off site and safe access and egress will be provided during a flood.	Agreed,	Policy DM15 Residential Moorings Proposals for the permanent residential use of moorings will only be permitted on the canal where adjacent to the existing built-up area and it can be demonstrated that the proposal will: <ul style="list-style-type: none"> <li>• Not compromise the ability of leisure boat users to access moorings</li> <li>• Have no adverse effect on the nature conservation value of the canal or nearby land</li> <li>• Include sufficient space at the moorings for essential facilities and landscaping</li> <li>• Provide adequate pedestrian and service vehicle access</li> <li>• Cause no harm to the historic or visual character of the canal</li> <li>• <u>Not increase flood risk</u></li> <li>• <u>Provide safe access and egress during a flood</u></li> <li>• Not impede navigation.</li> </ul>
SCO/0008	Dacorum Borough Council	We support the policies and standards set out in Sections 3 to 17 and Appendices 1 to 4 in guiding and controlling the quality and standard of development in Three Rivers. We particularly welcome the inclusion of more detailed policies on renewables and biodiversity given their importance in achieving sustainable forms of development.	Support noted.	

**Sustainability Appraisal and General Comments**

Reference	Name/ Organisation	Comments	Officers Comments	Changes to Document
SCO/0057	Natural England	<p>SAPD Sustainability Appraisal Appendix 2a of the SA states that woodland is immediately adjacent to allocated site H37 (Land South of St Josephs, Ainsdale Road, South Oxhey) but that it is not ancient woodland. According to the Natural England Ancient Woodland Inventory<sup>1</sup> this woodland is ancient semi-natural woodland. Please could this be amended?</p> <p>Habitat Regulations Assessment (HRA): We are satisfied that the conclusion of 'no significant effects on any Natural 2000 site' in relation to the HRA carried out for the Core Strategy is also applicable to the SAPD. Paragraphs 5.3. We fully support the statement that 'Developers should be encouraged from the outset to incorporate habitats into their developments'. This should be expanded to include Green Infrastructure.</p>	Agreed	Agreed
3673	Herts Constabulary Crime Prevention Design Service	<p>I note in paragraph 1.3 there is mention of the Core Strategy DPD and under CP12 – Design of Development paragraph (h) it states “Design out opportunities for crime and anti-social behaviour through the incorporation of appropriate measures to minimise the risk of crime and create safe and attractive places.” Unfortunately there is no indication of how this will be achieved other than the last paragraph of CP12 which advises guidance and standards will be provided in the Three Rivers Design Guide SPD which I’m unable to obtain from the website</p> <p>If the Design Guide SPD is yet to be written or in the course of preparation, we would be delighted to assist and/or provide comment on the SPD. It is interesting to note under policy CP12 that there is an indicator relating to both residential and commercial properties approved contrary to safety and security advice. Another tenant of CP12 is that crime/domestic burglaries per 1000 of the population be reduced year on year, Secured by Design is a proven means of reducing crime/burglary as statistically proven over a 20 year period by academics at the University of Huddersfield.</p> <p>A paper entitled- Re-evaluating Secured by Design (SBD) Housing In West Yorkshire March 2009 - Report written by Dr. Rachel Armitage and Leanne Monchuk confirmed the continuing reduction in criminality which has reduced by 62% over this period.</p> <p>Similarly the Association of British Insurers in their publication “Securing the Nation” promote designing out crime which supports the SBD levels of security in homes.</p> <p>CP12 also looks at Building for Life which does not mention in its 20 point assessment sustainability, safety or designing out crime and therefore does not totally support the other indicators for CP12 Appendix 1 – Monitoring Framework DM1 my comments regarding CP12 refer it is vital Secured by Design and BREEAM are included in the DPD so we can assist in reaching the targets which have been set in the DPD document.</p> <p>Affordable Housing SPD – June 2011 We examined the SPD as part of the overall review of LDF Development Management Policies DPD and compared it to a similar document dated November 2003. The 2003 document quite rightly looks at ensuring that all affordable housing meets a particular standard under paragraph 2.1.23 Securing Quality and from our perspective there was a minimum requirement to achieve “Secured by Design” certification. We have examined the June 2011 document and can find no similar specific mention regarding the safety and security of affordable home going forward from 2011. There is a comment in CP1 on Page 29, paragraph (n) which states “Promote buildings and public spaces .....reduces opportunities for crime and anti-social behaviour.” AHH6 of the June 2011 document highlights that policies CP1 and CP2</p>	<p>Comments on CP12 of Core Strategy.</p> <p>See comments on DM1.</p> <p>No further changes.</p> <p>Comments on Affordable Housing SPD.</p>	

		provide more guidance, also the second paragraph advises that both market or private and affordable housing should be built to similar standards. We are very disappointed the June 2011 document omits specific reference to Secured by Design, but a little heartened to note both private and affordable are to be built to the same standards.		
NSO/0077	CPRE Herts	Finally, in respect of policy monitoring, we are concerned that the Council proposes to use no indicators or criteria in Appendix 1 to the DPD, to determine whether Policy DM2 is being implemented or is proving effective during the lifetime of the DPD. As a minimum CPRE Hertfordshire considers that it is essential that the number of new dwellings in the Green Belt is monitored, and new floorspace in other categories of inappropriate development granted planning permission, both on an annual basis.	These are indicators for CP11. Appendix 1 to be clarified.	Appendix 1: DM2 Green Belt <del>N/A (CP11 monitored)</del> Indicator <a href="#">See CP11 Indicators</a>

Changes due to National Planning Policy Framework				
Section	Page/Paragraph	Original Wording	New Wording	Reason for change
introduction	Page 1 Paragraph 1.6	It has not been necessary to include local policies where issues are addressed sufficiently through National Planning Policy Statements. National Policy clearly states that Local Planning Authorities should not repeat or reformulate national or regional policies. Therefore, where there is no specific local policy because of adequate national/regional guidance, reference is made within the text to relevant documents.	<del>It has not been necessary to include local policies where issues are addressed sufficiently through National Planning Policy Statements. National Policy clearly states that Local Planning Authorities should not repeat or reformulate national or regional policies. Therefore, where there is no specific local policy because of adequate national/regional guidance, reference is made within the text to relevant documents.</del>	PPS12 replaced by NPPF. No longer a requirement not to repeat national guidance.
Residential Design and Layout	Page 3 Paragraph 3.1	National policy requires the achievement of high quality, sustainable design. It seeks planning policies that promote high quality, inclusive design in layouts and buildings in terms of function and impact. Design can have a large impact not only on individual buildings but also on the wider 'public realm', including our streets, town centres, parks and open spaces. Design which does not make the most of opportunities to improve the character and quality of an area should be refused.  The Draft National Planning Policy Framework refers to design as a key element in achieving sustainable development by ensuring attractive, useable and durable places.	<del>The National Planning Policy Framework states that one of the core land-use planning principles is to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people. National policy requires the achievement of high quality, sustainable design. It seeks planning policies that promote high quality, inclusive design in layouts and buildings in terms of function and impact.</del> Design can have a large impact not only on individual buildings but also on the wider 'public realm', including our streets, town centres, parks and open spaces. <del>Development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, should be refused permission. Design which does not make the most of opportunities to improve the character and quality of an area should be refused.</del>  <del>3.2 The Draft National Planning Policy Framework refers to design as a key element in achieving sustainable development by ensuring attractive, useable and durable places.</del>	PPS1, PPS3 and PPS5 revoked. However, this is entirely consistent with the objective of the NPPF to require good design (paragraphs 56-68).
	Page 6 Policy Links	PPS1: Delivering Sustainable Development PPS3: Housing Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPS3: Housing Draft National Planning Policy Framework</del>	PPS1 and PPS3 revoked. This is entirely consistent with the objectives of the NPPF to achieve sustainable development, which includes the protection and enhancement of the built environment (paragraph 6-10) and to deliver a wide choice of high quality homes.
Green Belt	DM2 Green Belt Page 9	<del>New Dwellings Buildings</del>  Within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those detailed in national and other relevant guidance. <del>Where sites are allocated for development in the Site Allocations DPD, this may represent very special circumstances.</del>	<del>New Dwellings Buildings</del>  Within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those detailed in national and other relevant guidance. <del>With regards to agricultural and forestry dwellings applicants must demonstrate compliance to the tests detailed in Appendix 3. Where sites are allocated for development in the Site Allocations DPD, this may represent very special circumstances.</del>	PPS7 revoked. NPPF paragraph 89, first bullet point states that buildings for agriculture and forestry are appropriate development in the green belt. It is important that the Council ensures that applications for planning permission for new occupational dwellings in the countryside/Green Belt are scrutinised thoroughly with the aim of detecting attempts to abuse this concession. To address this we

				have included a new Appendix 3 which sets out the tests based on Annex A of PPS7.
	Page 10 Policy Links	PPG2: Green Belt <u>PPS9: Biodiversity and Geological Conservation</u> Draft National Planning Policy Framework	<del>PPG2: Green Belt</del> <del>PPS9: Biodiversity and Geological Conservation</del> <del>Draft National Planning Policy Framework</del>	PPG2 and PPS9 revoked. However, this is entirely consistent with the objectives of the NPPF to achieve sustainable development, which includes the protection and enhancement of the natural environment (paragraph 6-10), and to protect the Green Belt (paragraphs 79-92).
Historic Environment	Page 12 Paragraph 5.1	Government policy sets out objectives for achieving sustainable development, protecting and enhancing the natural and historic built environment and sets the policy for the treatment of archaeological remains on land.	<del>Government policy</del> <u>The National Planning Policy Framework</u> sets out objectives for achieving sustainable development, protecting and enhancing the natural and historic built environment and sets the policy for the treatment of archaeological remains on land.	This is entirely consistent with the objectives of the NPPF to achieve sustainable development, which includes the protection and enhancement of the built environment (paragraph 6-10), to conserve and enhance the natural environment (paragraphs 109-125) and to conserve and enhance the historic environment (paragraphs 126-141).
	Page 12 Paragraph 5.2	National Policy refers to heritage assets which are defined 'as a building, monument, site, place, areas or landscape positively identified as having a degree of significance meriting consideration in planning decisions' <sup>2</sup>	National Policy refers to heritage assets which are defined 'as a building, monument, site, place, areas or landscape <u>positively</u> identified as having a degree of significance meriting consideration in planning decisions' <sup>2</sup> . <u>because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).</u> '	To reflect definition of Heritage Asset in NPPF contained in Annex 2:Glossary.
	Page 12 Paragraph 5.6	The Draft National Planning Policy Framework also emphasises the importance of the historic environment with the main Government objectives being to:	The <del>Draft</del> National Planning Policy Framework <u>also</u> emphasises the importance of the historic environment with the main Government objectives being to:	NPPF now published.
	Page 14 Paragraph 5.21	Guidance on enabling development is contained within Policy HE11 of PPS5 and the English Heritage booklet "Enabling Development and the Conservation of Heritage Assets", available at <a href="http://www.english-heritage.org.uk">www.english-heritage.org.uk</a> .	Guidance on enabling development is contained within <del>Policy HE11 of PPS5 and</del> the English Heritage booklet "Enabling Development and the Conservation of Heritage Assets", available at <a href="http://www.english-heritage.org.uk">www.english-heritage.org.uk</a> .	PPS5 revoked. However, this is entirely consistent with the objectives of the NPPF to conserve and enhance the historic environment (paragraphs 126-141).
	Page 18 Policy Links	PPS1: Delivering Sustainable Development PPS5: Planning for the Historic Environment PPS5: Planning for the Historic Environment: Historic Environment Practice Guide Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development</del> <del>PPS5: Planning for the Historic Environment</del> <del>PPS5: Planning for the Historic Environment: Historic Environment Practice Guide</del> <del>Draft National Planning Policy Framework</del>	PPS1, PPS5 revoked. However, this is entirely consistent with the objectives of the NPPF to achieve sustainable development, which includes the protection and enhancement of the built environment (paragraph 6-10) and to conserve and enhance the historic environment (paragraphs 126-141).
Carbon Dioxide Emissions and Renewable Energy	Page 19 Paragraph 6.4	National policy states that local authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change. This includes preparing planning policies that promote the prudent use of resources by making more efficient use or re-use of existing resources and	<del>National policy states that local authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change. This includes preparing planning policies that promote the prudent use of resources by making more efficient use or re-use of existing resources and</del>	PPS1 revoked – remove complete paragraph.

		encouraging the development of renewable energy resources. In particular, consideration should be given to encouraging energy efficient buildings, community heating systems and the use of combined heat and power in developments.	<del>development of renewable energy resources. In particular, consideration should be given to encouraging energy efficient buildings, community heating systems and the use of combined heat and power in developments.</del>	
	Page 20 Paragraph 6.9	National policy states that local authorities should set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low carbon energy sources where it is viable.	<del>National policy states that local authorities should set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low carbon energy sources where it is viable. The National Planning Policy Framework states that local authorities should support the move to a low carbon future by planning for new development in locations and ways which reduce greenhouse gas emissions, actively support energy efficiency improvements to existing buildings and set local requirements for a building's sustainability in a way consistent with the Government's zero carbon building policy.</del>	To reflect wording of NPPF. However, this is entirely consistent with the objective of the NPPF to ensure development meets the challenge of climate change (paragraphs 93-98).
	Page 23 Policy Links	PPS1: Delivering Sustainable Development PPS 7: Delivering Sustainable Development in Rural Areas PPS22: Renewable Energy Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPS 7: Delivering Sustainable Development in Rural Areas PPS22: Renewable Energy Draft National Planning Policy Framework</del>	PPS1, PPS7, PPS22 revoked. However, this is entirely consistent with the objectives of the NPPF to achieve sustainable development, which includes the protection and enhancement of the built environment (paragraph 6-10) and to ensure development meets the challenge of climate change (paragraphs 93-98).
Renewable Energy Developments	Page 24 New paragraph	N/A	<del>The National Planning Policy Framework states that local planning authorities should design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.</del>	To reflect the provisions of the NPPF, one of which the objectives are to achieve sustainable development, which includes the protection and enhancement of the built environment (paragraph 6-10) and to ensure development meets the challenge of climate change (paragraphs 93-98).
	Page 25 Policy Links	PPS1: Delivering Sustainable Development PPS22: Renewable Energy Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPS22: Renewable Energy Draft National Planning Policy Framework</del>	PPS1 and PPS22 revoked. However, this is entirely consistent with the objectives of the NPPF to achieve sustainable development, which includes the protection and enhancement of the built environment (paragraph 6-10) and to ensure development meets the challenge of climate change (paragraphs 93-98).
Biodiversity, Trees, Woodlands, Watercourses and Landscaping	Page 27 Paragraph 8.2	It is important that those not covered by designations are retained, protected and wherever possible, added to, since pressure for development will increasingly threaten trees, woodlands, and hedgerows <u>watercourses and their surrounding habitat</u> . National Planning Policy requires the potential impacts of planning decisions on biodiversity, landscape, trees and geological conservation to be fully considered.	It is important that those not covered by designations are retained, protected and wherever possible, added to, since pressure for development will increasingly threaten trees, woodlands, and hedgerows <u>watercourses and their surrounding habitat</u> . <del>National Planning Policy requires the potential impacts of planning decisions on biodiversity, landscape, trees and geological conservation to be fully considered.</del>	PPS9 revoked. Additional wording added in paragraph 8.4 of the DMP DPD.
	Page 27 Paragraph 8.3	Local Development Frameworks are required to indicate the location of designated sites of biodiversity and geological importance, and	<del>Local Development Frameworks National policy states that the planning system should contribute to and enhance the natural and local</del>	PPS9 revoked. To reflect wording of NPPF, an objective of which is

		identify any areas or sites for the restoration or creation of new priority habitats. Appropriate weight should be attached to designated sites of international, national and local importance, protected species and to biodiversity and geological interests in the wider environment.	<u>environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. The National Planning Policy Framework requires local authorities are required to indicate identify and map the locations</u> of designated sites of biodiversity and geological importance, and identify any areas or sites for the restoration or creation of new priority habitats. Appropriate weight should be attached to designated sites of international, national and local importance, protected species and to biodiversity and geological interests in the wider environment.	to conserve and enhance the natural environment (paragraphs 109-125).
	Page 27 Paragraph 8.4	The Draft National Planning Policy Framework states that a central way in which the goal of sustainable development will be achieved will be through the delivery of a healthy and natural environment. The Planning System will play a central role by minimising any impacts to biodiversity and encouraging the enhancement of biodiversity where possible.	<del>The Draft National Planning Policy Framework states that a central way in which the goal of sustainable development will be achieved will be through the delivery of a healthy and natural environment. The Planning System will play a central role by minimising any impacts to biodiversity and encouraging the enhancement of biodiversity where possible.</del>	PPS9 revoked. However it is the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125).
	Page 30 Policy DM6	Planning permission will be refused for any development that would be liable to cause demonstrable harm to protected woodland (including ancient woodland), trees and hedgerows, unless conditions can be imposed to secure their protection.	Planning permission will be refused for any development <del>that would be liable to cause demonstrable harm</del> <u>resulting in the loss or deterioration</u> to protected woodland (including ancient woodland), <u>protected trees (including aged or veteran trees)</u> and hedgerows, unless conditions can be imposed to secure their protection.	To reflect wording of NPPF. It is the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125), particularly paragraph 118. Definition of 'aged/veteran trees' to be put in glossary.
	Page 31 Policy Links	PPS1: Delivering Sustainable Development PPS9: Biodiversity and Geological Conservation Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPS9: Biodiversity and Geological Conservation Draft National Planning Policy Framework</del>	PPS1 and PPS9 revoked. It is the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125).
Landscape Character	Page 33 Paragraphs 9.1 and 9.2	National policy states that the most valued landscapes should have the highest level of protection and that locally valued landscapes should be protected through appropriate policies, with reference to landscape character assessments.  Areas of Outstanding Natural Beauty (AONBs) are designations of national importance for reasons relating to their natural beauty and contribution to the wider countryside.	<u>National Policy states the importance of conserving the landscape and scenic beauty or our National Parks, the Broads and Areas of Outstanding Natural Beauty (AONBs).</u>  <del>National policy states that the most valued landscapes should have the highest level of protection and that locally valued landscapes should be protected through appropriate policies, with reference to landscape character assessments.</del>  <del>Areas of Outstanding Natural Beauty (AONBs) are designations of national importance for reasons relating to their natural beauty and contribution to the wider countryside.</del>	PPS7 revoked. It is the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125), particularly to conserve AONBs 9paragraph 115).
	Page 35 National Policy	PPS1: Delivering Sustainable Development PPS7: Sustainable Development in Rural Areas	<del>PPS1: Delivering Sustainable Development PPS7: Sustainable Development in Rural Areas</del>	PPS1 and PPS7 revoked. It is the objective of the NPPF to achieve

			<a href="#">National Planning Policy Framework</a>	sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125).
Flood Risk and Water Resources	Page 37 Paragraph 10.1	National Guidance aims to ensure that flood risk is taken into account at all stages of the planning process and to avoid inappropriate development in areas at risk from flooding. Areas can be mapped according to the level of flood risk:	National <del>Guidance Policy</del> aims to ensure that flood risk is taken into account at all stages of the planning process and to avoid inappropriate development in areas at risk from flooding <u>by directing development away from areas at highest risk or where development is necessary, making it safe without increasing flood risk elsewhere</u> . Areas can be mapped according to the level of flood risk:	PPS25 revoked. It is the objective of the NPPF to meet the challenge of flooding (paragraphs 94 & 99-104) and for Local Plans to set out strategic policies for flood risk (paragraph 156).
	Page 37 Paragraph 10.5	The need for the planning system to support the transition to a low carbon economy by taking into account flood risk is set out in the Draft National Planning Policy Framework as a key objective. In achieving this objective, the planning system should: <ul style="list-style-type: none"> <li>Avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk or where development is necessary, making it safe without increasing flood risk elsewhere.</li> </ul>	<del>The need for the planning system to support the transition to a low carbon economy by taking into account flood risk is set out in the Draft National Planning Policy Framework as a key objective. In achieving this objective, the planning system should:</del> <ul style="list-style-type: none"> <li><del>Avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk or where development is necessary, making it safe without increasing flood risk elsewhere.</del></li> </ul>	Incorporated in to paragraph 10.1 of the DMP DPD.
	Page 40 Policy Links	PPS1: Delivering Sustainable Development PPS23: Planning and Pollution Control PPS23: Annex 1: Pollution Control, Air and Water Quality PPS25: Planning and Flood Risk PPS25: Planning Policy Statement 25 Development and Flood Risk Practice Guide Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPS23: Planning and Pollution Control PPS23: Annex 1: Pollution Control, Air and Water Quality PPS25: Planning and Flood Risk PPS25: Planning Policy Statement 25 Development and Flood Risk Practice Guide Draft National Planning Policy Framework</del>	PPS1, PPS23, PPS25 revoked. It is the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125), to meet the challenge of flooding (paragraphs 94 & 99-104) and for Local Plans to set out strategic policies for flood risk (paragraph 156).
Contamination and Pollution Control	Page 42 Paragraph 11.2  Paragraph 11.3	Government policy gives guidance on the pollution control regimes (including noise), that interact with the planning system. These considerations are complemented by legislation outside the planning process.  The Draft National Planning Policy Framework emphasises the planning system's role in working towards a healthy and natural environment. This includes preventing new and existing development from contributing to or being exposed to an unacceptable level of land, air, water or noise pollution or land instability.	<del>Government policy gives guidance on the</del> Pollution control regimes (including noise), <del>that interact with the planning system. These considerations are</del> <u>governed</u> <del>complemented</del> by legislation outside the planning process.  The <del>Draft</del> National Planning Policy Framework emphasises the planning system's role in working towards a healthy and natural environment. This includes preventing <u>both</u> new and existing development from contributing to or being <u>adversely affected by</u> <del>exposed to an</del> unacceptable levels of land, air, water or noise pollution or land instability.	PPS23 revoked. To reflect the wording of the NPPF, an objective of which is to achieve sustainable development which includes protecting and enhancing the environment (paragraphs 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125).
	Page 43 Paragraph 11.10	In line with national guidance, it is important to ensure noise-sensitive developments are located away from existing sources of significant noise and that potentially noisy developments are located in areas where noise will not be such an important consideration or where its impact can be minimised.	<del>In line with national guidance,</del> It is important to ensure noise-sensitive developments are located away from existing sources of significant noise and that potentially noisy developments are located in areas where noise will not be such an important consideration or where its impact can be minimised. <u>When assessing a proposal for residential development near a source of noise, the Council will have regard to Appendix 4.</u>	PPS23 revoked. This is entirely consistent with the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraphs 6-10). Guidance as Appendix 4 replicates

				content of PPG24 in order to advise DM officers on the level of noise..
	Page 46	The Council will seek to ensure that noise from proposed commercial, industrial, recreational or transport use does not cause any significant increase in the background noise level of nearby existing noise-sensitive property such as dwellings, hospitals, residential institutions, nursing homes, hotels, guesthouses, schools and other educational establishments.	The Council will seek to ensure that noise from proposed commercial, industrial, recreational or transport use does not cause any significant increase in the background noise level of nearby existing noise-sensitive property such as dwellings, hospitals, residential institutions, nursing homes, hotels, guesthouses, schools and other educational establishments. <u>When assessing proposals for residential development near a source of noise we will have regards to Appendix 4 which indicates the appropriate response to the level of noise by source.</u>	Guidance as Appendix 4 replicates content of PPG24 in order to advise DM officers.
	Page 46 Policy Links	PPS1: Delivering Sustainable Development <u>PPS9: Biodiversity and Geological Conservation</u> PPS23: Planning and Pollution Control PPS23: Annex 1: Pollution Control, Air and Water Quality PPG24: Planning and Noise PPS25: Planning and Flood Risk PPS25: Planning Policy Statement 25 Development and Flood Risk Practice Guide Draft National Planning Policy Statement	<del>PPS1: Delivering Sustainable Development</del> <del>PPS9: Biodiversity and Geological Conservation</del> <del>PPS23: Planning and Pollution Control</del> <del>PPS23: Annex 1: Pollution Control, Air and Water Quality</del> <del>PPG24: Planning and Noise</del> <del>PPS25: Planning and Flood Risk</del> <del>PPS25: Planning Policy Statement 25 Development and Flood Risk Practice Guide</del> <del>Draft National Planning Policy Statement</del>	PPS1, PPS9, PPS23, PPG24 and PPS25 revoked. This is entirely consistent with the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125), to meet the challenge of flooding (paragraphs 94 & 99-104) and for Local Plans to set out strategic policies for flood risk (paragraph 156).
Waste Management	Page 47 Policy Links	PPS1: Delivering Sustainable Development PPS10: Planning for Sustainable Waste Management Planning for Sustainable Waste Management: A Companion Guide to PPS10 PPS23: Planning and Pollution Control PPS23: Annex 1: Pollution Control, Air and Water Quality	<del>PPS1: Delivering Sustainable Development</del> <del>PPS10: Planning for Sustainable Waste Management</del> <del>Planning for Sustainable Waste Management: A Companion Guide to PPS10</del> <del>PPS23: Planning and Pollution Control</del> <del>PPS23: Annex 1: Pollution Control, Air and Water Quality</del> <del>National Planning Policy Framework</del>	PPS1 and PPS23 revoked. This is entirely consistent with the objective of the NPPF to achieve sustainable development which includes protecting and enhancing the environment (paragraph 6-10), and for the planning system to conserve and enhance the natural environment (paragraphs 109-125).
Open Space, Sport and Recreation Facilities and Children's Play Space	Page 51 Paragraph 13.2	National Guidance states that local authorities should complete robust assessments of existing open space, sport and recreation provision and for future needs of communities for open space, sport and recreation facilities. Open space standards should also be set locally and include: <ul style="list-style-type: none"> <li>Quantitative estimates of how much is needed</li> <li>A qualitative component (against which to measure the need for enhancement of existing facilities) and</li> <li>Accessibility considerations (including distance thresholds and consideration of the cost of using a facility).</li> </ul>	<del>National Guidance states that local authorities should complete robust assessments of existing open space, sport and recreation provision and for future needs of communities for open space, sport and recreation facilities. Open space standards should also be set locally and include:</del> <ul style="list-style-type: none"> <li><del>Quantitative estimates of how much is needed</del></li> <li><del>A qualitative component (against which to measure the need for enhancement of existing facilities) and</del></li> <li><del>Accessibility considerations (including distance thresholds and consideration of the cost of using a facility).</del></li> </ul>	PPS17 revoked. However, this is entirely consistent with the NPPF to achieve sustainable development, which includes the support of strong, vibrant and healthy communities (paragraphs 6-10 and 69-78). The NPPF also highlights at paragraph 73 that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
	Paragraph 13.4	The Draft National Planning Policy Framework refers to the need to ensure access to open spaces and recreational facilities that promote the health and well being of the community.	The <del>Draft</del> National Planning Policy Framework refers to the need to ensure access to open spaces and recreational facilities that promote the health and well being of the community.	NPPF now published (paragraphs 6-10 and 69 – 78)
	Pages 54-55 Policy Links	PPS1: Delivering Sustainable Development PPG17: Planning for Open Space, Sport and Recreation	<del>PPS1: Delivering Sustainable Development</del> <del>PPG17: Planning for Open Space, Sport and Recreation</del>	PPS1 and PPG17 revoked. However, this is entirely consistent with the objective of the NPPF to

		Draft National Planning Policy Framework	<del>Draft</del> National Planning Policy Framework	achieve sustainable development, which includes the support of strong, vibrant and healthy communities (paragraphs 6-10 and 69-78). The NPPF also highlights at paragraph 73 that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
Community, Leisure and Cultural Facilities	Page 56 Paragraph 14.2	Government policy makes it clear that all members of the community should be able to access leisure and community facilities and that they should not be disadvantaged as a result of development proposals.	<del>Government</del> National policy makes it clear that all members of the community should be able to access leisure and community facilities and that they should not be disadvantaged as a result of development proposals.	PPS1 revoked. However, this is entirely consistent with the objective of the NPPF to achieve sustainable development, which includes the supports of strong, vibrant and healthy communities (paragraphs 6-10 and 69-78).
	Page 56 Paragraph 14.3	The Draft National Planning Policy Framework refers to the need to deliver the right community facilities to meet local needs.	The <del>Draft</del> National Planning Policy Framework refers to the need to deliver the right community facilities to meet local needs.	NPPF now published.
	Page 58 Policy Links	PPS1: Delivering Sustainable Development PPS4: Planning for Sustainable Economic Growth Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPS4: Planning for Sustainable Economic Growth Draft National Planning Policy Framework</del>	PPS1 and PPS4 revoked. However, this is entirely consistent with the objective of the NPPF
Parking	Page 59 Paragraph 15.2	In 2011, National Policy was amended to set out the Government's revised position on car parking standards. Whilst the main emphasis of National Policy is still focussed on encouraging sustainable modes of transport and reducing reliance on cars, there is a recognition that people may still wish to own their own personal car.	<del>In 2011, National Policy was amended to set out the Government's revised position on car parking standards. Whilst the main emphasis of National Policy is still focussed on encouraging sustainable modes of transport and reducing reliance on cars, there is a recognition that people may still wish to own their own personal car.</del>	PPS 3 revoked. However, this is entirely consistent with the objective of the NPPF to achieve sustainable development and promote sustainable transport (paragraphs 29-41).
	Page 59 Paragraph 15.3	Previously, Local Planning Authorities had been required to set and apply maximum standards for residential development. This requirement for residential development has now been deleted. The revised position adopts a localised approach, noting that Local Authorities 'are best placed to take account of local circumstances and are able to make the right decisions for the benefit of their communities'. There will still be a requirement to set parking standards, but Local Authorities will determine what these should be based on the individual circumstances of their communities. Policies should: <ul style="list-style-type: none"> <li>• Be developed as part of a package of planning and transport measures to promote sustainable transport choices</li> <li>• Not require developers to provide more spaces than they themselves wish, other than in exceptional circumstances</li> <li>• Encourage the shared use of parking</li> <li>• Require developers to provide designated parking spaces for disabled people</li> <li>• Require safe, convenient and secure cycle parking in development; and</li> <li>• Consider appropriate provision for motorcycle parking.</li> </ul>	<del>Previously, Local Planning Authorities had been required to set and apply maximum standards for residential development. This requirement for residential development has now been deleted. The revised position adopts a localised approach, noting that Local Authorities 'are best placed to take account of local circumstances and are able to make the right decisions for the benefit of their communities'. There will still be a requirement to set parking standards, but Local Authorities will determine what these should be based on the individual circumstances of their communities. Policies should: <ul style="list-style-type: none"> <li>• Be developed as part of a package of planning and transport measures to promote sustainable transport choices</li> <li>• Not require developers to provide more spaces than they themselves wish, other than in exceptional circumstances</li> <li>• Encourage the shared use of parking</li> <li>• Require developers to provide designated parking spaces for disabled people</li> <li>• Require safe, convenient and secure cycle parking in development; and</li> <li>• Consider appropriate provision for motorcycle parking.</li> </ul> </del>	PPS 3 revoked. Paragraph deleted. Paragraph 15.4 below amended to reflect the requirements of paragraph 39 of the NPPF.
	Paragraph 15.4	Furthermore, National Policy states that residential parking policies should be developed taking account of expected levels of car ownership, the importance of promoting good design and the need to	<del>Furthermore,</del> National policy states that <u>when setting local parking standards for residential and non-residential development parking policies local planning authorities</u> should <u>be developed taking take into</u>	PPS3 revoked. The wording of this paragraph has been changed to reflect the NPPF (paragraph 39). The

		use land efficiently.	account <del>of expected levels of car ownership, the importance of promoting good design and the need to use land efficiently. :</del> <ul style="list-style-type: none"> <li>o <u>the accessibility of the development</u></li> <li>o <u>the type, mix and use of development</u></li> <li>o <u>the availability of and opportunities for public transport</u></li> <li>o <u>local car ownership levels and</u></li> <li>o <u>an overall need to reduce the use of high-emission vehicles</u></li> </ul>	footnote is altered because it is consistent with the objective of the NPPF to achieve sustainable development and promote sustainable transport (paragraphs 29-41), This is not in conflict with the NPPF which sets out at paragraph 39 that local authorities may set local parking standards and gives the factors that should be taken into account in setting these standards.
	Paragraph 15.5	Recently, the need to reduce the use of high emission vehicles has become a central part of transport and climate change policy alike. The Draft National Planning Policy Framework states that local authorities should encourage the provision of sustainable modes of transport and that new developments should incorporate facilities for charging plug in and other low emission vehicles.	Recently, the need to reduce the use of high emission vehicles has become a central part of transport and climate change policy alike. The <del>Draft</del> National Planning Policy Framework states that local authorities should encourage the provision of sustainable modes of transport and that new developments should incorporate facilities for charging plug in and other low emission vehicles.	NPPF now published.
	Page 61 Policy Links	PPS1: Delivering Sustainable Development PPG13: Transport Draft National Planning Policy Framework	<del>PPS1: Delivering Sustainable Development PPG13: Transport Draft National Planning Policy Framework</del>	PPS1 and PPG17 revoked. However, this is entirely consistent with the objective of the NPPF
Telecommunications	Page 63 Paragraph 16.1	Planning Policy Guidance 8: Telecommunications sets out the Governments policy on telecommunications which include radio masts and towers, antennae of all kinds, radio equipment housing, public call boxes, cabinets, poles and overhead wires. It recognises the need to ensure the continued functioning and extension of existing telecommunications systems and the development of new networks whilst balancing the need to protect visual amenity and minimise environmental impacts.	<del>Planning National Policy Guidance 8: Telecommunications</del> sets out the Governments policy on <u>high speed broadband and</u> telecommunications which include radio masts and towers, antennae of all kinds, radio equipment housing, public call boxes, cabinets, poles and overhead wires. It recognises the <del>need to ensure the continued functioning and extension of existing telecommunications systems and the</del> development of <del>new networks whilst balancing the need to protect visual amenity and minimise environmental impacts.</del> <u>high speed broadband technology and other communications networks also play a vital role in enhancing the provision of of local community facilities and services.</u>	PPG8 revoked. Paragraph changed to reflect wording of NPPF (paragraphs 42-46). Policy is in general conformity with NPPF.
	Page 63 Policy links	PPG8: Telecommunications PPG2: Green Belts PPS5: Planning for the Historic Environment	<del>PPG8: Telecommunications PPG2: Green Belts PPS5: Planning for the Historic Environment National Planning Policy Framework</del>	PPG8, PPG2 and PPS5 revoked.
Moorings	Page 65 Policy Links	PPS1:Delivering Sustainable Development PPS7:Sustainable Development in Rural Areas PPG2:Green Belt	<del>PPS1:Delivering Sustainable Development PPS7:Sustainable Development in Rural Areas PPG2:Green Belt National Planning Policy Framework</del>	PPS1, PPS7 and PPG2 revoked. policy in general conformity with NPPF.
New Appendix 3	Appendix 3		<b><u>APPENDIX 3: AGRICULTURAL AND FORESTRY DWELLINGS</u></b>  The National Planning Policy Framework states that buildings for agriculture and forestry are not inappropriate in the Green Belt. This Appendix relates to applications for agricultural and forestry dwellings.  <u>There may be occasion where new residential development may be</u>	NPPF paragraph 89 states that buildings for forestry and agriculture are not inappropriate and the Council supports this. However, to ensure that applications for new dwellings for agriculture and forestry are genuine the tests of Annex A of the revoked PPS7 has been adapted here to ensure that applications for such dwellings are justified.

			<p><u>justified when accommodation is required to enable agricultural, forestry and certain other full-time workers to live at, or in the immediate vicinity of, their place of work. It will often be as convenient and more sustainable for such workers to live in nearby towns or villages, or suitable existing dwellings, so avoiding new and potentially intrusive development in the Green Belt. However, there will be some cases where the nature and demands of the work concerned make it essential for one or more people engaged in the enterprise to live at, or very close to, the site of their work. Whether this is essential in any particular case will depend on the needs of the enterprise concerned and not on the personal preferences or circumstances of any of the individuals involved.</u></p> <p><u>It is essential that all applications for planning permission for new dwellings in the Green Belt are scrutinised thoroughly with the aim of detecting attempts to abuse (e.g. through speculative proposals) the concession that the planning system makes for such dwellings. In particular, it will be important to establish whether the stated intentions to engage in farming, forestry or any other rural-based enterprise, are genuine, are reasonably likely to materialise and are capable of being sustained for a reasonable period of time. It will also be important to establish that the needs of the intended enterprise require one or more of the people engaged in it to live nearby.</u></p> <p><u>Permanent Agricultural Dwellings</u></p> <p><u>New permanent dwellings will only be allowed to support existing agricultural activities on well-established agricultural units, providing:</u></p> <ol style="list-style-type: none"> <li><u>i. there is a clearly established existing functional need (see paragraph 5 below);</u></li> <li><u>ii. the need relates to a full-time worker, or one who is primarily employed in agriculture and does not relate to a part-time requirement;</u></li> <li><u>iii. the unit and the agricultural activity concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and have a clear prospect of remaining so (see paragraph 9 below);</u></li> <li><u>iv. the functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and</u></li> <li><u>v. other planning requirements, e.g. in relation to access, or impact on the countryside, are satisfied.</u></li> </ol> <p><u>A functional test is necessary to establish whether it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. Such a requirement might arise, for example, if workers are needed to be on hand day and night:</u></p> <ul style="list-style-type: none"> <li><u>• in case animals or agricultural processes require essential care at short notice;</u></li> <li><u>• to deal quickly with emergencies that could otherwise cause serious loss of crops or products, for example, by frost damage or the failure of automatic systems.</u></li> </ul> <p><u>In cases where we are particularly concerned about possible abuse, we will investigate the history of the holding to establish the recent pattern of</u></p>	
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			<p><u>use of land and buildings and whether, for example, any dwellings, or buildings suitable for conversion to dwellings, have recently been sold separately from the farmland concerned. Such a sale could constitute evidence of lack of agricultural need.</u></p> <p><u>The protection of livestock from theft or injury by intruders may contribute on animal welfare grounds to the need for a new agricultural dwelling, although it will not by itself be sufficient to justify one. Requirements arising from food processing, as opposed to agriculture, cannot be used to justify an agricultural dwelling. Nor can agricultural needs justify the provision of isolated new dwellings as retirement homes for farmers.</u></p> <p><u>If a functional requirement is established, it will then be necessary to consider the number of workers needed to meet it, for which the scale and nature of the enterprise will be relevant.</u></p> <p><u>New permanent accommodation cannot be justified on agricultural grounds unless the farming enterprise is economically viable. A financial test is necessary for this purpose, and to provide evidence of the size of dwelling which the unit can sustain. In applying this test (see paragraph 4 (iii) above), we will take a realistic approach to the level of profitability, taking account of the nature of the enterprise concerned. Some enterprises which aim to operate broadly on a subsistence basis, but which nonetheless provide wider benefits (e.g. in managing attractive landscapes or wildlife habitats), can be sustained on relatively low financial returns.</u></p> <p><u>Agricultural dwellings should be of a size commensurate with the established functional requirement. Dwellings that are unusually large in relation to the agricultural needs of the unit, or unusually expensive to construct in relation to the income it can sustain in the long-term, will not be permitted. It is the requirements of the enterprise, rather than those of the owner or occupier, that are relevant in determining the size of dwelling that is appropriate to a particular holding.</u></p> <p><u>We will consider making planning permissions subject to conditions removing some of the permitted development rights under part 1 of the Town and Country Planning (General Permitted Development) Order 1995 for development within the curtilage of a dwelling house. For example, proposed extensions could result in a dwelling whose size exceeded what could be justified by the functional requirement, and affect the continued viability of maintaining the property for its intended use, given the income that the agricultural unit can sustain. However, it will always be preferable for such conditions to restrict the use of specific permitted development rights rather than to be drafted in terms which withdraw all those in a Class (see paragraphs 86-90 of DOE Circular 11/95).</u></p> <p><u>Agricultural dwellings should be sited so as to meet the identified functional need and to be well-related to existing farm buildings, or other dwellings.</u></p> <p><u>Temporary Agricultural Dwellings</u></p> <p><u>If a new dwelling is essential to support a new farming activity, whether on a newly-created agricultural unit or an established one, it should normally, for the first three years, be provided by a caravan, a wooden structure which can be easily dismantled, or other temporary</u></p>	
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			<p><u>accommodation. It should satisfy the following criteria:</u></p> <p><u>(i) clear evidence of a firm intention and ability to develop the enterprise concerned (significant investment in new farm buildings is often a good indication of intentions);</u></p> <p><u>(ii) functional need (see paragraph 5);</u></p> <p><u>(iii) clear evidence that the proposed enterprise has been planned on a sound financial basis;</u></p> <p><u>(iv) the functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned; and</u></p> <p><u>(v) other normal planning requirements, e.g. on siting and access, are satisfied.</u></p> <p><u>If permission for temporary accommodation is granted, permission for a permanent dwelling will not subsequently be given unless the criteria in paragraph 4 above are met. We will make clear the period for which the temporary permission is granted, the fact that the temporary dwelling will have to be removed, and the requirements that will have to be met if a permanent permission is to be granted. We will not normally grant successive extensions to a temporary permission over a period of more than three years, nor give temporary permissions in locations where we would not permit a permanent dwelling.</u></p> <p><u>Forestry Dwellings</u></p> <p><u>Local planning authorities should apply the same criteria to applications for forestry dwellings as to those for agricultural dwellings. The other principles in the advice on agricultural dwellings are equally relevant to forestry dwellings. Under conventional methods of forestry management, which can involve the use of a peripatetic workforce, new forestry dwellings may not always be justified, except perhaps to service intensive nursery production of trees.</u></p> <p><u>Occupancy Conditions</u></p> <p><u>Where the need to provide accommodation to enable farm, forestry or other workers to live at or near their place of work has been accepted as providing the special justification required for new, isolated residential development in the Green Belt it will be necessary to ensure that the dwellings are kept available for meeting this need for as long as it exists. For this purpose planning permission will be made subject to appropriate occupancy conditions.</u></p>	
New Appendix 4	Appendix 4		<p><b><u>APPENDIX 4: Noise Exposure Categories for Residential Development</u></b></p> <p><u>When assessing a proposal for residential development near a source of noise, the Council will determine into which of the four noise</u></p>	New Appendix to reflect the tests in the revoked PPG24.

exposure categories (NECs) the proposed site falls, taking account of both day and night-time noise levels. The Council will then have regard to the advice in the appropriate NEC, as below:

<u>Table 7 Noise Exposure Categories</u>	
<u>NEC</u>	-
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<u>A</u>	<u>Noise need not be considered as a determining factor in granting planning permission, although the noise level at the high end of the category should not be regarded as a desirable level</u>
<u>B</u>	<u>Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise</u>
<u>C</u>	<u>Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise</u>
<u>D</u>	<u>Planning permission should normally be refused</u>

A recommended range of noise levels is given below for each of the NECs for dwellings exposed to noise from road, rail, air, and "mixed sources". Paragraph 10 onwards provides a detailed explanation of how the boundaries of each of the NECs have been derived.

**Other noise-sensitive development**

Developments such as offices, hospitals and schools will contain buildings and activities which are noise-sensitive. But these developments are likely to occupy sizeable sites and to contain a proportion of buildings and activities which are less noise-sensitive. The NEC principle cannot therefore be sensibly applied to such developments and it will be more appropriate to refer to specific guidance on internal noise standards in respect of each activity. General information can be found in BS 8233 1987. Information about guidance for health and hospital buildings is available from NHS Information Centre for Health and Social Care (www.ic.nhs.uk). The Department for Education publishes guidance for schools (Building Bulletin 87 Guidelines for Environmental Design in Schools).

**Noise index and measurement positions**

For the purposes of consistency all noise indices are expressed in terms of LAeq,T and the time periods of day and night time of between

07.00-23.00 and 23.00-07.00.

Values in the table below refer to noise levels measured on an open site at the position of the proposed dwellings, well away from any existing buildings, and 1.2m to 1.5m above the ground. The arithmetic average of recorded readings should be rounded up. Where that average falls on the boundary between NECs B and C the Council will determine which is the more appropriate NEC for the proposal taking into account the need for the development.

Levels of noise from road and rail traffic are often specified at one metre from a facade, and these facade levels should be assumed to be 3 dB(A) higher than levels measured away from any buildings, unless a more accurate figure is available. For road traffic noise in NECs C and D, LAeq,16h ~ LA10,18h -2 dB.

For aircraft, the noise levels refer to aircraft noise exposure contour values which are specified at 1.2m above the ground and published at 3 dB(A) intervals (each 3 dB(A) increment represents a doubling of noise energy). Because most aircraft noise originates from above, contours include the effects of ground reflection (see Note 2 below).

**Recommended Noise Exposure Categories For New Dwellings Near Existing Noise Sources**

Table 8 Noise Levels: the noise level(s) (LAeq,T) used when deciding the NEC of a site should be representative of typical conditions. Corresponding To The Noise Exposure Categories For New Dwellings LAeq,T dB

-	<b><u>Noise Exposure Category</u></b>			
	<b><u>A</u></b>	<b><u>B</u></b>	<b><u>C</u></b>	<b><u>D</u></b>
<b><u>Noise Source</u></b>				
<b><u>road traffic</u></b>	-	-	-	-
<b><u>07.00 - 23.00</u></b>	<b><u>&lt;55</u></b>	<b><u>55 - 63</u></b>	<b><u>63 - 72</u></b>	<b><u>&gt;72</u></b>
<b><u>23.00 - 07.00</u></b>	<b><u>&lt;45</u></b>	<b><u>45 - 57</u></b>	<b><u>57 - 66</u></b>	<b><u>&gt;66</u></b>
<b><u>rail traffic</u></b>	-	-	-	-
<b><u>07.00 -</u></b>	<b><u>&lt;55</u></b>	<b><u>55 -</u></b>	<b><u>66 -</u></b>	<b><u>&gt;74</u></b>



			<p><u>industrial noise sources. The "mixed source" values are based on the lowest numerical values of the single source limits in the table. The "mixed source" NECs should only be used where no individual noise source is dominant.</u></p> <p>e. <b>Night-time noise levels (23.00 - 07.00):</b> <u>sites where individual noise events regularly exceed 82 dB LAmax (S time weighting) several times in any hour should be treated as being in NEC C, regardless of the LAeq,8h (except where the LAeq,8h already puts the site in NEC D).</u></p> <p><u>To check if any individual noise source is dominant (for the purposes of this assessment) the noise level from the individual sources should be determined and then combined by decibel addition (remembering first to subtract 2 dB (A) from any aircraft noise contour values). If the level of any one source then lies within 2 dB(A) of the calculated combined value, that source should be taken as the dominant one and the site assessed against the appropriate NEC for that source, rather than using the "mixed source" NECs.</u></p> <p><u>If the contribution of the individual noise sources to the overall noise level cannot be determined by measurement and/or calculation, then the overall measured level should be used and the site assessed against the NECs for "mixed sources".</u></p> <p><b>Noise Exposure Categories: Explanation of Noise Levels</b></p> <p><u>The following is an explanation of how the boundaries of each of the noise exposure categories (NECs) in the table at Paragraph 1 above have been calculated or derived. Wherever possible figures have been based on research findings or figures contained in statutory regulations. However, the NEC table attempts to give guidance across a broad spectrum of situations and not all of these are covered by existing research work or regulations. In these instances assessments and interpolations have had to be made and these are also explained below.</u></p> <p><u>The explanations under each heading make specific reference to each of the transport modes: road, rail, and air. However, separate explanations of "mixed sources" are not given. The "mixed source" values are based on the lowest numerical values of the single source limits in the table.</u></p> <p><u>The values given in the NEC table are free-field levels, together with an addition of 2 dB(A) for ground reflection of air traffic noise. Details of correction factors to convert between façade levels and free-field where appropriate are given below. For night-time levels typical insulation values for window installations that are likely to be used in each NEC have been assumed. Because the insulation performance of different window installations is likely to vary, these values are nominal.</u></p> <p><u>Noise levels at the boundary of NEC A and NEC B</u></p> <p><u>Daytime</u></p> <p><u>The level at the boundary of NEC A and NEC B for road and rail traffic is based on guidance provided by the World Health Organisation <sup>(B.2)</sup> that "general daytime outdoor noise levels of less than 55 dB (A) Leq are desirable to prevent any significant community annoyance". The figure of 55 dB(A) has been taken to be free-field and therefore no adjustments have been necessary for road and rail traffic noise levels</u></p>	
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			<p><u>before inserting them in the table. In respect of air traffic noise a considerable amount of research has been carried out. <sup>(B.3)</sup> 57 dB(A) Leq (previously 35 NNI) relates to the onset of annoyance as established by noise measurements and social surveys</u></p> <p><u><i>Night-Time</i></u></p> <p><u>The night time noise level at the boundary of NEC A and NEC B is based on the WHO guideline previously referred to which states that for night time: "based on limited data available, a level of less than 35 dB(A) is recommended to preserve the restorative process of sleep" and this is considered more relevant when seeking to achieve the best practicable conditions for rest and sleep.</u></p> <p><u>The sound insulation qualities of a partially open window are taken to be 10 - 15 dB(A) <sup>(B.4)</sup> and for the purposes of the NEC table a reduction of 13 dB(A) from the facade level has been assumed. This would give a recommended maximum figure of 48 dB(A) at the facade. However, as the NEC figures are free-field a correction of -3 dB(A) is necessary giving 45 dB(A) in the table for road and rail noise. For air traffic noise 2 dB(A) has been added to 45 dB(A) to allow for ground reflection, making 47 dB(A). The level in the table of 48 dB(A) is the nearest aircraft dB(A) Leq contour value.</u></p> <p><u>Noise levels at the boundary of NEC B and NEC C</u></p> <p><u><i>Daytime</i></u></p> <p><u>The daytime noise levels for all three transport modes at the boundary of NEC B and NEC C are based on the levels that trigger official grant schemes. For road traffic noise the trigger level is 68 dB LA10,18h <sup>(B.5)</sup> at a facade. This has been converted to an LAeq,18h level by subtracting 3 dB, and to an LAeq,16h value by adding 1 dB, giving 66 dB LAeq,16h at a facade. Finally, this figure has been converted to a free-field level by subtracting 3 dB, thus arriving at 63 dB LAeq,16h in the table.</u></p> <p><u>For railway noise the proposed trigger level <sup>(B.6)</sup> is 68 dB LAeq,18h at a facade. This has been converted to 66 dB LAeq,16h free-field.</u></p> <p><u>For air traffic noise, 66 dB(A) LAeq,16h, previously 50 NNI, was the daytime criterion for noise insulation schemes at Heathrow, Gatwick and Stansted.</u></p> <p><u><i>Night-time</i></u></p> <p><u>The night-time level at the boundary of NEC B and NEC C for road traffic is, like that at the boundary of NEC A and NEC A, based on the WHO figure of 35 dB(A). Because noise should be taken into account when determining planning applications in NEC B, it has been assumed that the minimum amelioration measure available to an occupant at night will be to close bedroom windows. Single glazed windows provide insulation of about 25 dB(A) <sup>(B.7)</sup>. Therefore, in order to achieve 35 dB(A) inside a bedroom, the facade level should not exceed 60 dB(A). This facade level requires a further 3 dB(A) adjustment to convert it to the free-field level of 57 dB(A) for road traffic at the boundary of NEC B and NEC C. For rail traffic, the level proposed to trigger the official grant scheme has been adopted. This level is 63 dB LAeq,6h and it has been converted to 59 dB LAeq,8h free-field. For air traffic, the level proposed to trigger the grant scheme at Stansted airport <sup>(B.8)</sup> has been adopted. This level is the 57 dB(A) Leq contour value.</u></p>	
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Noise levels at the boundary of NEC C and NEC D

Daytime

The noise level at the boundary of NEC C and NEC D for road traffic is based on a Building Research Establishment (BRE) survey<sup>(B.9)</sup> which has shown that the insulation package supplied under the Noise Insulation Regulations is inadequate for road traffic noise levels of 78 dB LA10,18h and above at a facade. This figure is equivalent to a free-field level of 75 dB LA10,18h; which in turn is equivalent to 73 dB LAeq,16h. The 73 dB LAeq,16h has been reduced by 1 dB to 72 dB LAeq,16h in the table at the boundary of NEC C and NEC D, which is the maximum external level that the standard noise insulation package will reduce to an acceptable internal level.

There is some evidence<sup>(B.10)</sup> that noise from rail traffic causes less disturbance than noise from road traffic at the same level. Therefore, the level at the boundary of NEC C and NEC D has been set 2 dB higher than the free-field level for road traffic noise.

For air traffic noise the value put forward in Circular 10/73, has been used. This is 60 NNI or 72 dB LAeq,16h, including a 2 dB allowance for ground reflection.

Night-time

The night-time levels at the boundary of NEC C and NEC D are, like those at the boundary of NEC A and NEC B, based on the WHO figure of 35 dB(A). The standard noise insulation package provides insulation of about 35 dB(A). Therefore at a facade level of 70 dB(A) or above the internal limit for a bedroom of 35 dB(A) may not be achieved. The level of 70 dB(A) has therefore been reduced by 1 dB(A) and a correction factor of 3 dB(A) applied to derive the free-field level of 66 dB(A) in the table at the boundary of NEC C and NEC D for road and rail noise. For air traffic noise the level of 66 dB(A) is the nearest aircraft dB(A) Leq contour value to provide equivalent protection.

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**End Notes**

1 Noise levels: the noise level(s) (LAeq,T) used when deciding the NEC of a site should be representative of typical conditions

2 Environmental Health Criteria 12 - Noise. World Health Organisation, 1980.

3 Directorate of Operational Research and Analysis "The Noise and Number Index" DORA Communication 7907, Second Edition, September 1981 Brooker, P et al "United Kingdom Aircraft Noise Index Study: Final Report" Civil Aviation Authority DR Report 8402, January 1985, Critchley, JB and Ollerhead, JB "The Use of Leq as an Aircraft Noise Index" Civil Aviation Authority DORA Report 9023, September 1990

4 Transportation Noise Reference Book: Edited by Paul Nelson, published by Butterworths, 1987.

5 Noise Insulation Regulations, 1975: SI 1975:1763

6 The Noise Insulation (Railways and Other Guided Transport

			<p><a href="#">Systems) Regulations 1996. SI 1996 No 428.</a></p> <p><a href="#">7 Transportation Noise Reference Book: Edited by Paul Nelson, published by Butterworths, 1987 and Sound Control For Homes, published by the Building Research Establishment and CIRIA, 1993 [BRE report 238, CIRIA report 127]</a></p> <p><a href="#">8 Department for Transport Consultation Paper: Proposed Stansted Noise Insulation Grants Scheme, September 1990.</a></p> <p><a href="#">9 Utlely W. et al "The effectiveness and acceptability of measures for insulating dwellings against traffic noise" (Journal of Sound and Vibration (1986) Vol 109(1), pages 1-18).</a></p> <p><a href="#">10 "Railway Noise and the Insulation of Dwellings" Mitchell Committee Report, published February 1991</a></p>	
Appendix 5	PPS and PPGs	<p><b>Planning Policy Statement 1:</b> Delivering Sustainable Development</p> <p><b>Planning Policy Statement:</b> Planning and Climate Change - Supplement to Planning Policy Statement 1</p> <p><b>Planning Policy Statement:</b> Eco-towns- Supplement to Planning Policy Statement 1</p> <p><b>Planning Policy Guidance 2:</b> Green belts</p> <p><b>Planning Policy Statement 3:</b> Housing</p> <p><b>Planning Policy Statement 5:</b> Planning for the Historic Environment</p> <p><b>Planning Policy Statement 4:</b> Planning for Sustainable Economic Growth</p> <p><b>Planning Policy Statement 7:</b> Sustainable Development in Rural Areas</p> <p><b>Planning Policy Guidance 8:</b> Telecommunications</p> <p><b>Planning Policy Statement 9:</b> Biodiversity and Geological Conservation</p> <p><b>Planning Policy Statement 10:</b> Planning for Sustainable Waste Management</p> <p><b>Planning Policy Statement 11:</b> Regional Spatial Strategies</p> <p><b>Planning Policy Statement 12:</b> Local Spatial Planning</p> <p><b>Planning Policy Guidance 13:</b> Transport</p> <p><b>Planning Policy Guidance 14:</b> Development on unstable land</p> <p><b>Planning Policy Guidance 17:</b> Planning for Open Space, Sport and Recreation</p> <p><b>Planning Policy Guidance 18:</b> Enforcing planning control</p> <p><b>Planning Policy Guidance 19:</b> Outdoor Advertisement Control</p> <p><b>Planning Policy Guidance 20:</b> Coastal planning</p> <p><b>Planning Policy Statement 22:</b> Renewable energy</p>	<p><b>National Planning Policy Framework</b></p> <p><del><a href="#">Planning Policy Statement 1: Delivering Sustainable Development</a></del></p> <p><del><a href="#">Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1</a></del></p> <p><del><a href="#">Planning Policy Statement: Eco-towns- Supplement to Planning Policy Statement 1</a></del></p> <p><del><a href="#">Planning Policy Guidance 2: Green belts</a></del></p> <p><del><a href="#">Planning Policy Statement 3: Housing</a></del></p> <p><del><a href="#">Planning Policy Statement 5: Planning for the Historic Environment</a></del></p> <p><del><a href="#">Planning Policy Statement 4: Planning for Sustainable Economic Growth</a></del></p> <p><del><a href="#">Planning Policy Statement 7: Sustainable Development in Rural Areas</a></del></p> <p><del><a href="#">Planning Policy Guidance 8: Telecommunications</a></del></p> <p><del><a href="#">Planning Policy Statement 9: Biodiversity and Geological Conservation</a></del></p> <p><del><a href="#">Planning Policy Statement 10: Planning for Sustainable Waste Management</a></del></p> <p><del><a href="#">Planning Policy Statement 11: Regional Spatial Strategies</a></del></p> <p><del><a href="#">Planning Policy Statement 12: Local Spatial Planning</a></del></p> <p><del><a href="#">Planning Policy Guidance 13: Transport</a></del></p> <p><del><a href="#">Planning Policy Guidance 14: Development on unstable land</a></del></p> <p><del><a href="#">Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation</a></del></p> <p><del><a href="#">Planning Policy Guidance 18: Enforcing planning control</a></del></p> <p><del><a href="#">Planning Policy Guidance 19: Outdoor Advertisement Control</a></del></p> <p><del><a href="#">Planning Policy Guidance 20: Coastal planning</a></del></p> <p><del><a href="#">Planning Policy Statement 22: Renewable energy</a></del></p> <p><del><a href="#">Planning Policy Statement 23: Planning and Pollution Control</a></del></p>	Revocation of PPS and PPGs

		<p><b>Planning Policy Statement 23:</b> Planning and Pollution Control</p> <p><b>Planning Policy Guidance 24:</b> Planning and noise</p> <p><b>Planning Policy Statement 25:</b> Development and Flood Risk</p> <p><b>Planning Policy Statement:</b> Development and Coastal Change – Supplement to Planning Policy Statement 2</p>	<p><del>Planning Policy Guidance 24: Planning and noise</del></p> <p><del>Planning Policy Statement 25: Development and Flood Risk</del></p> <p><del>Planning Policy Statement: Development and Coastal Change – Supplement to Planning Policy Statement 2</del></p>	
Appendix 6	<p>Glossary</p> <p><u>Aged or Veteran Tree</u></p> <p><b>East of England Plan</b></p> <p><b>Heritage Assets</b></p> <p><b>OSS</b></p> <p><b>PPG</b></p> <p><b>PPS</b></p>	<p>The Government intend to revoke the Regional Spatial Strategy through the Localism Bill.</p> <p>They include designated heritage assets (as defined in PPS5) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).</p> <p>Open Space Sport and Recreation Study (OSS). A strategy covering open space, playing pitches and sport and recreational facilities to guide future provision and management of existing resources in the District as required by PPG17.</p> <p>Planning Policy Guidance (PPG) – Guidance produced by the Government setting out national planning policy (being replaced by Planning Policy Statements).</p> <p>Planning Policy Statement (PPS) – Guidance produced by the Government setting out national planning policy (gradually replacing Planning Policy Guidance).</p>	<p><u>A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.</u></p> <p>The Government intend to revoke the Regional Spatial Strategy. <del>through the Localism Bill.</del></p> <p>They include designated heritage assets (<del>as defined in PPS5</del>) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).</p> <p>Open Space Sport and Recreation Study (OSS). A strategy covering open space, playing pitches and sport and recreational facilities to guide future provision and management of existing resources in the District <del>as required by PPG17.</del></p> <p><del>Planning Policy Guidance (PPG) – Guidance produced by the Government setting out national planning policy (being replaced by Planning Policy Statements).</del></p> <p><del>Planning Policy Statement (PPS) – Guidance produced by the Government setting out national planning policy (gradually replacing Planning Policy Guidance).</del></p>	<p>Definition in NPPF.</p> <p>Localism Bill enacted and Government yet to revoke RSS</p> <p>PPS5 revoked.</p> <p>PPG17 revoked</p> <p>PPGs revoked.</p> <p>PPS revoked.</p>

Changes due to the introduction of The Town and Country Planning (Local Planning) (England) Regulations 2012

Section	Page/Paragraph	Original Wording	New Wording	Reason for change
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Front Cover	Front Cover	Local Development Framework	Local Plan	Local Development Framework replaced by Local Plan. Regulation 5, 6 & 8
Front Cover	Front Cover	Development Management Policies Development Plan Document	Development Management Policies <u>Local</u> Development <u>Plan</u> Document	Local Development Framework replaced by Local Plan. Regulation 5, 6 & 8
Introduction	Page 1 Paragraph 1.1 to 1.4	<p>1.1 The Local Development Framework will replace the existing Three Rivers Local Plan 1996-2011 to help plan for, and manage development in the District in the next 15 years or so.</p> <p>1.2 For Three Rivers, the Local Development Framework will consist of a number of Development Plan Documents (DPDs) including:</p> <ul style="list-style-type: none"> <li>• The Core Strategy DPD: provides the over-arching strategy and policies and the long term vision for Three Rivers</li> <li>• Site Allocations DPD: allocates sites for housing, employment, retail, open space, education and community uses</li> <li>• Development Management Policies DPD: sets out the policies against which planning applications will be assessed</li> <li>• Gypsy and Traveller DPD: allocates sites for Gypsy and Travellers.</li> </ul> <p><b>What is the Development Management Policies Development Plan Document?</b></p> <p>1.3 The Development Management Policies DPD sets out the criteria against which all planning applications within the District will be considered. The Council considers that these policies will enable the delivery of the objectives and long term vision for Three Rivers set out in the Core Strategy DPD which was adopted by the Council on 17 October 2011. These policies have been informed by a broad evidence base and through a series of consultations.</p> <p>1.4 The policies within this DPD must be read together with those strategic policies and objectives outlined in the Core Strategy (as well as National and Regional Policy Guidance). Additional guidance for specific policies will also be provided in the form of Supplementary Planning Documents (SPDs). Details of the relevant SPD or where the Council intends to develop a further SPD in the future is contained within the text of the relevant chapter.</p>	<p>1.1 The Local <del>Plan for Development Framework will replace the existing</del> Three Rivers <del>Local Plan 1996-2011 to</del> <u>will</u> help plan for, and manage development in the District in the next 15 years or so.</p> <p>1.2 For Three Rivers, the Local <del>Development Framework Plan</del> will consist of a number of <u>Local</u> Development <del>Plan</del> Documents (<del>DPDs</del> <u>LDDs</u>) including:</p> <ul style="list-style-type: none"> <li>• The Core Strategy <del>DPD</del>: provides the over-arching strategy and policies and the long term vision for Three Rivers</li> <li>• Site Allocations <del>DPD</del>: allocates sites for housing, employment, retail, open space, education and community uses</li> <li>• Development Management Policies <del>DPD</del>: sets out the policies against which planning applications will be assessed</li> <li>• Gypsy and Traveller <del>DPD</del>: allocates sites for Gypsy and Travellers.</li> </ul> <p><b>What is the Development Management Policies <u>Local</u> Development <u>Plan</u> Document?</b></p> <p>1.3 The Development Management Policies <del>DPD</del> <u>LDD</u> sets out the criteria against which all planning applications within the District will be considered. The Council considers that these policies will enable the delivery of the objectives and long term vision for Three Rivers set out in the Core Strategy <del>DPD</del> which was adopted by the Council on 17 October 2011. These policies have been informed by a broad evidence base and through a series of consultations.</p> <p>1.4 The policies within this <del>DPD</del> <u>LDD</u> must be read together with those strategic policies and objectives outlined in the Core Strategy (as well as National and Regional Policy Guidance). Additional guidance for specific policies will also be provided in the form of Supplementary Planning Documents (SPDs). Details of the relevant SPD or where the Council intends to develop a further SPD in the future is contained within the text of the relevant chapter.</p>	Local Development Framework replaced by Local Plan. Regulation 5, 6 & 8.
Residential Design & Layout	Page 5 Paragraph 3.6	The principle of design forms one of the overarching policies within the Council's Core Strategy <del>DPD</del> (CP12).	The principle of design forms one of the overarching policies within the Council's Core Strategy <del>DPD</del> (CP12).	DPD replaced by LDD. Regulation 5(a)
Green Belt	Page 9 Paragraph 4.6	Any changes to the established Green Belt boundary as defined in the Local Plan will be made through the Site Allocations DPD and shown on the Proposals Map.	Any changes to the established Green Belt boundary as defined in the Local Plan will be made through the Site Allocations <del>DPD</del> <u>LDD</u> and shown on the Proposals Map.	DPD replaced by LDD. Regulation 5(a)
	DM2 Green Belt last sentence of first paragraph	Where sites are allocated for development in the Site Allocations <del>DPD</del> <u>LDD</u> , this may represent very special circumstances.	Where sites are allocated for development in the Site Allocations <del>DPD</del> <u>LDD</u> , this may represent very special circumstances.	DPD replaced by LDD. Regulation 5(a)

Historic Environment	Page 16 Paragraph 5.22	Responding to climate change and promoting the use of renewable energy has also been identified as a priority for the Council within the Core Strategy DPD.	Responding to climate change and promoting the use of renewable energy has also been identified as a priority for the Council within the Core Strategy <del>DPD</del> .	DPD replaced by LDD. Regulation 5(a)
Carbon Dioxide Emissions and Renewable Energy	Page 22 Paragraph 6.12	Policy CP1, of the Core Strategy DPD sets out the Council's broad approach to sustainable development.	Policy CP1, of the Core Strategy <del>DPD</del> sets out the Council's broad approach to sustainable development.	DPD replaced by LDD. Regulation 5(a)
Flood Risk and Water Resources	Page 39 Paragraph 10.9	The Council has taken into account flood risk in identifying development sites through the Site Allocations DPD.	The Council has taken into account flood risk in identifying development sites through the Site Allocations <del>DPD</del> .	DPD replaced by LDD. Regulation 5(a)
Waste Management	Page 50 Paragraph 12.10	The Council also encourages measures which contribute to reducing waste wherever possible Developers will be expected to provide information on how development will reduce waste as part of the C Plan Energy and Sustainability Statement required under Policy CP1 of the Core Strategy DPD.	The Council also encourages measures which contribute to reducing waste wherever possible Developers will be expected to provide information on how development will reduce waste as part of the C Plan Energy and Sustainability Statement required under Policy CP1 of the Core Strategy <del>DPD</del> .	DPD replaced by LDD. Regulation 5(a)
Appendix 2 Design Criteria	Page 72	(a) <b>General Criteria: Extensions</b> In addition to any other policies of the Local Development Framework which may apply, extensions must:	(a) <b>General Criteria: Extensions</b> In addition to any other policies of the Local <del>Development Framework</del> <u>Plan</u> which may apply, extensions must:	DPD replaced by LDD. Regulation 5(a)
	Page 73 2 <sup>nd</sup> Paragraph	Applications for new development will be assessed on their own merits. In addition to any other policies of the Local Development Framework which may apply, new development must:	Applications for new development will be assessed on their own merits. In addition to any other policies of the Local <del>Development Framework</del> <u>Plan</u> which may apply, new development must:	DPD replaced by LDD. Regulation 5(a)
Appendix 5	Glossary			
	Core Strategy	The Local Development Framework document which sets out the long-term spatial vision for the local planning authority area and the spatial objectives and strategic policies to deliver that vision. The Core Strategy will have the status of a Development Document.	The <del>Local Development Framework</del> document which sets out the long-term spatial vision for the local planning authority area and the spatial objectives and strategic policies to deliver that vision. <del>The Core Strategy will have the status of a Development Document.</del>	DPD replaced by LDD and LDD are Local Plans. Regulation 5(a) and Regulation 6
	Development Plan	The statutory Development Plan currently comprises the Regional Spatial Strategy, Waste and Minerals Framework and the Development Plan Documents (DPD) contained in the Local Development Framework (LDF).	The statutory Development Plan currently comprises the Regional Spatial Strategy, Waste and Minerals Framework and the <u>Local Development Plan</u> Documents ( <del>DPD</del> ) contained in the Local <del>Development Framework (LDF)</del> <u>Plan</u> .	As above.
	DPD	Development Plan Document (DPD) is a Local Development Document which forms part of the statutory development plan, including the Core Strategy, Site Allocations and Development Management Policies.	<del>Development Plan Document (DPD) is a Local Development Document which forms part of the statutory development plan, including the Core Strategy, Site Allocations and Development Management Policies.</del>	DPDs replaced by LDD and Local Plans. Regulations 5 & 6
	Evidence Base	This enables the preparation of a sound Local Development Framework meeting the objectives of sustainable development.	This enables the preparation of a sound Local <u>Development Framework Plan</u> meeting the objectives of sustainable development.	Local Development Framework replaced with Local Plan.
	LDF	Local Development Framework – the portfolio or folder of Local Development Documents, which set out the planning policy framework for the District.	<del>Local Development Framework – the portfolio or folder of Local Development Documents, which set out the planning policy framework for the District.</del>	As above.
	Local Development Document	Local Development Document – comprising two main types: Development Plan Documents and Supplementary Planning Documents, which together from the Local Development Framework.	Local Development Document – <del>comprising two main types: Development Plan Documents and Supplementary Planning Documents, which together from the Local Development Framework.</del> <u>documents prepared by the Local Planning Authority that make up the Local Plan</u>	Regulations 5 & 6
	Local Plan	The plan produced under the former planning system by District Councils. The Three Rivers Local Plan will be replaced by the Local Development Framework.	<del>The plan produced under the former planning system by District Councils. The Three Rivers Local Plan will be replaced by the Local Development Framework.</del> <u>Set of documents that set out the planning policy for the District.</u>	Regulations 5 & 6

	Proposals Map	This map illustrates the policies and proposals in the Development Plan Documents (DPDs) on an Ordnance Survey base.	This map illustrates the policies and proposals in the <u>Local</u> Development <del>Plan</del> Documents ( <del>DPDs</del> ) ( <u>LDDs</u> ) on an Ordnance Survey base.	Regulations 5 & 6 DPDs replaced by LDDs
	SPD	Supplementary Planning Document (SPD) – Elaborates on policies or proposals in Development Plan Documents and gives additional guidance. Successor to Supplementary Planning Guidance.	Supplementary Planning Document (SPD) – Elaborates on policies or proposals in <u>Local</u> Development <del>Plan</del> Documents and gives additional guidance. Successor to Supplementary Planning Guidance.	Regulations 5 & 6 DPDs replaced by LDDs