

Summary of Responses Submitted to the Independent Examiner 2016		
No.	Consultee Details	Consultation Response
1	Herts & Middlesex Wildlife Trust	<p>Herts and Middx Wildlife Trust is concerned that the Croxley Green Neighbourhood Plan contains no policies or script addressing the consideration of biodiversity. In line with the NPPF sustainable development involves the protection and enhancement of biodiversity as one of its three central tenets, yet there is no mention of it in this plan. HMWT suggest that policies that explain how biodiversity will be conserved and enhanced are required, in line with the guidance provided in the NPPF. This states:</p> <p><i>7. There are three dimensions to sustainable development: economic, social and <u>environmental</u>. These dimensions give rise to the need for the planning system to perform a number of roles:</i></p> <p><i>an environmental role – contributing to <u>protecting and enhancing our natural, built and historic environment</u>; and, as part of this, <u>helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</u></i></p> <p><i>113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites,²⁴ so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.</i></p> <p><i>114. Local planning authorities should:</i></p> <ul style="list-style-type: none"> ● <i>set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</i> <p><i>117. To minimise impacts on biodiversity and geodiversity, planning policies should:</i></p> <ul style="list-style-type: none"> ● <i>plan for biodiversity at a landscape-scale across local authority boundaries;</i> ● <i>identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;</i> ● <i>promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;</i> <p><i>152. Local planning authorities should seek opportunities to achieve each of the economic, social and <u>environmental</u> dimensions of</i></p>

		<p><i>sustainable development, and net gains across all three.</i></p> <p><i>155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the <u>sustainable development</u> of the area, including those contained in any neighbourhood plans that have been made.</i></p> <p><i>157. Crucially, Local Plans should:</i></p> <p><i>contain a clear strategy for enhancing the <u>natural</u>, built and historic environment,</i></p> <p>Currently this neighbourhood plan contains no strategy for the consideration of biodiversity. HMWT suggest that policies that address this are added to the document. The template policies in the attachment have been approved by the Examiner in other neighbourhood plans and should be adapted to the Croxley Green Neighbourhood Plan. At present this neighbourhood plan is entirely lacking in considering biodiversity in a local context.</p>
2	Three Rivers Museum	<p>We have already made an input to the plan prior to its submission by Croxley Green Parish Council and therefore have no further comments.</p> <p>Please notify us in due course of the Local Planning Authority's decision.</p>
3	Highways England	<p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in particular M25 Junction 17 and 18.</p> <p>Having examined the documents, we do not offer any comment to this consultation.</p>
4	Danes Educational Trust	<p>Submission of the Danes Educational Trust</p> <ol style="list-style-type: none"> 1. St Clement Danes School was established in 1862. In 1976 the school moved to its current site in Chorleywood Hertfordshire. In November 2016 the Single Academy Trust converted to a Multi-Academy Trust (the Danes Educational Trust, the 'Trust') to facilitate the opening of Croxley Danes School in September 2017. 2. In 2013 Hertfordshire County Council (HCC) approached St Clement Danes School, requesting that as an outstanding provider, the school make application to the Department for Education (DfE) to open a new secondary school in South-West Hertfordshire. HCC made this request of St Clement Danes in order to meet a significant projected basic need for additional

		<p>secondary school places in South-West Hertfordshire, as predicted by HCC’s pupil forecast model. St Clement Danes agreed to work with HCC and submitted an application to open a Free School, Croxley Danes School, via the presumptive route in October 2014.</p> <p>3. The permanent site for Croxley Danes School, on land North East of Baldwins Lane, Croxley Green was allocated for educational use in the Site Allocation Local Development Design adopted by Three Rivers District Council (TRDC) in November 2014. The Site Allocation Local Development Design supports the delivery of the Core Strategy of the TRDC Local Development Plan, which was adopted in October 2011.</p> <p>4. In March 2015, the Free School application for Croxley Danes School was approved by the DfE to progress to pre-opening under two conditions:</p> <ul style="list-style-type: none"> i) That the opening of the school be delayed until September 2017 ii) That HCC acquire the designated permanent site for the school on land North-East of Baldwins Lane Croxley Green. <p>5. HCC agreed Heads of Terms for a 150 year lease of the permanent site for Croxley Danes School with Transport for London (the vendor) in September 2016. Contracts were exchanged on the lease agreement in April 2017.</p> <p>Amendments to Croxley Green Neighbourhood Development Plan - Policy PR02</p> <p>6. The Trust was not invited to participate in the pre-submission consultation of the Croxley Green Neighbourhood Plan; however, in co-ordination with the Educational Skills Funding Agency (ESFA), who provide the capital funding for Free School projects, objection was raised in February 2017 to the pre-submission final draft wording of Neighbourhood Development Plan Policy PR02, which relates to the permanent site allocated to Croxley Danes School.</p> <p>7. TRDC commissioned Planning Officers Society Enterprises (POSe) to conduct an Independent Review of the Final Consultation Draft of the Croxley Green Neighbourhood Development Plan. The Independent Review was published in March 2017 and the Examiner stated:</p> <p><i>‘To allow a neighbourhood plan to progress to referendum the Examiner is required to confirm whether it has been prepared in such a way that it meets the “Basic Conditions” set out in the primary legislation, regulations and summarised in National Planning Practice Guidance (NPPG), para.65.’</i></p>
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Item 18 (page 17) of the review table provided by the Independent Examiner considers that the pre-submission final draft of Policy PRO2 failed to meet the Basic Conditions summarised in NPP Guidance. The examiner commented:

- i) *Policy PRO2 will fail to meet Condition (e) the making of the neighbourhood must be in general conformity with the strategic policies contained in the development plan for the area.*
- ii) *The site including the playing field is safeguarded education land. The Education Funding Authority (EFA) and Hertfordshire County Council (HCC) are the responsible bodies for bringing forward the secondary school on this site. The policy position put forward in PRO2 contradicts some of the key development principles adopted for the education site via the TRDC's Site Allocation Document. Through the examination process it was confirmed there are no suitable opportunities for the provision of the playing fields off-site and land to the north west of the site allocation cannot therefore be safeguarded as open space in perpetuity by the neighbourhood plan.*

8. Amendments to Policy PRO2 have subsequently been made in the Neighbourhood Development Plan. For example the original requirements that *'provision for playing fields is located off-site'* and *'the northwest portion is safeguarded in perpetuity as an open space'* have been relaxed to become considerations of a development proposal rather than specific requirements. However, it is the view of the Trust that these amendments to Policy PRO2 should go further and these elements should be deleted entirely from Policy PRO2 because the whole site has been allocated for educational use in the TRDC Local Development Plan and the retention of the land to the north as open land does not accord with the allocation. The Trust has consistently stated that any provision of off-site playing fields introduces a significant safeguarding risk to the students, which is wholly unnecessary. The Trust's duty of care to its students is paramount and should not be undermined through such considerations as those included in Policy PRO2.

9. Policy PRO2 requires that the *'proposals for the school site should be the subject of a planning brief devised by TRDC'*. The Independent Examiner did not concur with this view and similarly the Trust agrees with the Independent Examiner that this requirement is unnecessary, and again does not agree with the wording of the site allocation within the TRDC Local Development Plan.

10. The remaining requirements of Policy PRO2 are:

- *The landscape value of the site is safeguarded*

		<ul style="list-style-type: none"> • <i>The archaeology of the site is thoroughly investigated</i> • <i>Trees covered by the TPOs are retained and additional planting is incorporated</i> • <i>The school facilities are available for out of hours use by the public</i> • <i>The issues of access, parking and road safety are adequately resolved</i> <p>11. The requirement that <i>'the school facilities are available for out of hours use by public'</i> is a matter of operational management for the Trust, who will be responsible for the school facilities. The Trust will be required to undergo due diligence with regard to those parties seeking to use the facilities as a matter of safeguarding students and maintaining site security. The Trust will also be responsible for the ongoing cost of maintaining the school facilities. The public use of the facilities may be relevant to a planning application but is not relevant to the Neighbourhood Plan and therefore should be deleted from Policy PR02.</p> <p>12. The PR02 requirement that <i>'trees covered by the TPOs are retained and additional planting incorporated'</i> takes further the relevant statement in the TRDC Site Allocation Local Development design that <i>'there are some mature trees and tree groupings on the site which should be retained where possible as part of any scheme'</i>. The requirements relating to the <i>'landscape value'</i>, <i>'archaeology'</i> and <i>'access, parking and road safety'</i> are not necessary and unduly prescriptive, being matters pertaining to the planning determination process.</p> <p>13. The effect of the additional requirements in Policy PR02 is to constrain the development of the permanent site for Croxley Danes School by introducing restrictions which do not comply with the allocation within the TRDC Local Development Plan. Such an approach does not comply with advice within the National Planning Policy Framework (NPPF). Paragraph 184 of the NPPF states that Neighbourhood Plans should not promote "less development" than set out in the Local Plan or seek to undermine its strategic objectives. This lack of conformity with the TRDC Local Development Plan means that the Croxley Green Neighbourhood Plan (as currently drafted) fails to meet one of the basic conditions.</p> <p>14. In summary, the Trust objects to the current wording of Policy PR02. The requirements and considerations in Policy PR02 should either be deleted or re-worded to ensure that the Croxley Green Neighbourhood Plan conforms to the Core Strategy of the TRDC Local Development Plan, in so doing becoming compliant with the basic conditions summarised in NPP Guidance.</p> <p>15. The Trust requests that it remains advised of any amendments to Policy PR02.</p>
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5	Resident	<p>Dear Team - I am appalled at the lack of insight and consultation about this development plan. It is short sighted, discriminatory and poor.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p>I would draw your attention to paragraphs 8, 11 and 12 in our submission which contain the Trust's views and objections to requirements in Policy PR02 relating to the playing fields, use of the site by the public and overly prescriptive points about matters such as the conservation of trees and archaeological surveys.</p> <p>Please throw this plan in the bin as it deserves and give our children a brighter future by proper planning and use of funds. The Croxley Danes school should be supported and every effort should be made to ensure the Danes Trust is satisfied. They are doing work the council should have been doing!!</p>
6	Resident	<p>I have just received an email stating that you are considering or have all already requested that Croxley Danes playing fields will be out of the school grounds.</p> <p>I am very dissapointed about this.... we have waited a really long time for a new school as you keep building flats and houses for more people to live in the area however you have yet to build more important buildings likes schools and doctors surgeries. Why on earth would you even consider using up land elsewhere for the children to travel to play sports and have PE lessons???? It makes no sense and is potentially very dangerous and time consuming for the children's education. The only thing that makes sense is to utilise the whole land specially for the school and the children of Croxley Green.</p> <p>There are way too many flats being built and you are just going to make living around here even harder. Waiting two weeks to see your doctor is ridiculous and children having No local schools to go to is a disgrace.</p> <p>We need this school built and it needs to be quickly.</p> <p>Please do forward me a different email is this does not concern you, as I want this email put in a file to say</p> <p>I OBJECT TO A PLAYING FIELD OUTSIDE OF THE SCHOOL GROUNDS.</p>

7	Resident	<p>As a prospective parent of Croxley Danes school, please note my objections to the Croxley Green Neighbourhood Plan:</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>Please also notify me of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
8	Resident	<p>Please find below my thoughts on the Croxley Green neighbourhood Development Plan in relation to the Croxley Danes School site.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p>
9	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
10	Resident	<p>We believe that the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan.</p> <p>Therefore we wish to state that Policy PR02 is not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
11	Resident	<p>I am writing with regard to the "Croxley Green Neighbourhood Plan 2017-2032" public consultation</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley</p>

		<p>Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I strongly believe that a school on this site will enhance the local area and be an asset to the area for generations to come.</p>
12	Resident	<p>It has come to my attention that the proposed Croxley Danes School may have school playing fields allocated separate to the Cassiobridge site, which is of major concern.</p> <p>Together with my daughter we may the decision for her to attend the new school when she starts senior school in September. This was a decision made more difficult following the death of Grace's mother in February this year. However, I have been reassured that every effort will be made to ensure the new school will be of the highest standards which, I thought would include all the facilities you would expect at the site and school of this type.</p> <p>On a technical level the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>From parents perspective it seems ludicrous to have the sports fields elsewhere that will cause further people and vehicle traffic around the Croxley estate. It would seem far more logical to keep all the staff and students within the grounds as much as possible. The cost within reason should not be an excuse to cut corners with such an important community school. The fact that the school will be built every effort should be made to ensure it is of the highest standards in keeping with the area.</p>
13	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>As a general comment, the entities involved in the decision making process, seem to be giving less importance to the fact that Croxley demographics have changed, and it is urgent to have schools within the area. Needs must, and the mood should be to do whatever is</p>

		needed to deliver the facilities for educating the next generation – now.
14	Resident	<p>I am a resident of Croxley Green who is excited and relieved that the Croxley Danes School is going ahead. However, I am greatly concerned by the consideration to placing the playing fields in a detached location. It seems an unnecessary risk to our childrens safety and the efficient functioning of the school.</p> <p>The requirements of Policy PR02 in the Croxlet Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>We need to accomodate the needs of families which are living in Croxley Green. I am keen to protect the wildlife and green areas too which is why I am also strongly opposed to building further housing in the area.</p> <p>As such I would appreciate being notified of the local Planning Authority's decision under regulation 19 of the Neighbourhood Development Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
15	TfL Planning Transport for London	<p>Thank you for consulting Transport for London (TfL) on the submission draft of the Croxley Green Neighbourhood Plan. TfL Planning sent a response to an earlier draft of the Neighbourhood Plan in September 2016 (reproduced below). It is pleasing to note that a number of issues raised in that earlier response have been addressed in the submission draft. I enclose an updated response prepared by officers in TfL Planning which should be read alongside the response dated 7th September 2016. Both responses reflect TfL's transport planning, project delivery, operations and infrastructure interests. A separate updated response will be prepared by TfL Property to reflect TfL's commercial development interests as a landowner of potential development sites.</p> <p><u>Updated comments – May 2017</u></p> <p>TfL notes that references to the Metropolitan Line Extension and estimated opening dates have been updated as requested</p> <p>Character areas (CA1 – CA5)</p> <p>TfL welcomes the inclusion of text in paragraph 5.1.4 acknowledging that 'The primary role of the railway corridor is for transport and some development which affects the character of the railway and the canal corridors may be necessary for operation and maintenance purposes' alongside more extensive changes to text in appendices B12 and B13</p>

		<p>made in response to TfL's comments. It should be noted that necessary works could include changes to the railway bridges listed in policy CA5. As previously stated the Transport and Works Act Order (TWAO) for the Metropolitan Line Extension provides planning powers to construct the Metropolitan Line Extension along part of this corridor. TfL wishes to reiterate the point that the provisions of the TWAO need to be acknowledged in the policies and supporting justification.</p> <p>Croxley Station (PRO3)</p> <p>TfL welcomes the recognition that although an initial feasibility study into providing step free access has been initiated by London Underground, at the present time there is no commitment or funding to provide step free access at the station within the current TfL Business Plan.. Further discussions between TfL and Three Rivers District Council / Hertfordshire County Council are on-going. A decision on whether the scheme will be funded is expected by the end of 2017 once a network review has been completed.</p> <p>Appendix B12 (Character Area 10) and Appendix B13 (Character Area 11)</p> <p>As stated above TfL welcomes the additions and changes made to B12.2 and B12.4 and B13.10 made in response to TfL's earlier comments</p>
16	Resident	<p>As a parent of one of the pupils of the first intake for Croxley Danes School.</p> <p>I am writing to express my concerns regards this consultation in particular;</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p>I would add that I am a resident of Croxley Green and having grown up here I strongly believe in protecting green belt areas. However with schools being closed down and then knocked down, to be replaced with family housing the need for a new secondary school has arisen. To which we were ecstatic to have in Croxley Green at the Site on baldwins lane. The issue of the playing fields being on a separate site is a significant safeguarding issue for the pupils and this would concern me greatly as a parent and a resident of Croxley Green.</p>
17	Resident	<p>As a parent of a child about to start in Croxley Danes school, I wish to make the following points.</p>

		<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
18	Resident	<p>I write in response to the public consultation on the development of Croxley Green and Croxley Danes school. I believe the Neighbourhood Development Plan put forward will place some significant constraints on the successful development of this much needed new school.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>There is a vital requirement for this school to be delivered with appropriate facilities, a project that is vital not just for local children but of benefit to the entire community.</p>
19	Resident	<p>As a parent of a child who is about to go to Croxley Danes School. I would like to raise an objection to the Croxley Green Neighbourhood Development Plan.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also request to be notified of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
20	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I request to be notified of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General)</p>

		Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.
21	Resident	<p>Please find below my response to the Croxley Green Development Plan.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to, the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p>
22	Resident	<p>As a Croxley resident with a child going to Croxley Danes I was disappointed to find out further delays may be caused by disputes over the playing fields.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p>I would draw your attention to paragraphs 8, 11 and 12 in our submission which contain the Trust's views and objections to requirements in Policy PR02 relating to the playing fields, use of the site by the public and overly prescriptive points about matters such as the conservation of trees and archaeological surveys.</p>
23	Resident	<p>I was extremely disappointed to read that you seem to be backtracking and causing unnecessary alterations to the plans for Croxley Danes School. Having the playing area off site is extremely stupid, and puts the children at risk moving them off site for games etc.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>Stop messing about with future plans for the school, which has been proved is extremely necessary for local children and their education needs</p>
24	Resident	<i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with</i>

		<p><i>the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p><i>In addition, I totally object to the requirements in Policy PR02 relating to the playing fields, use of the site by the public and overly prescriptive points about matters such as the conservation of trees and archaeological surveys.</i></p> <p><i>There appears to be a deliberate attempt by certain individuals within the Croxley Green community to undermine the building of Croxley Danes School . I would remind the Croxley Green Parish and local community that all schools sighted within Croxley Green are of poor build quality (especially primary schools). In addition, I challenge any Croxley Green resident to safely drive and park at school drop off & pickup times (ask most residents around schools about safety and access; they will tell you the lack of). As for playing fields, what a laugh. Where are Malvern Way playing fields (not discounting the artificial surface, what a wonderful landscape that is)? Also, should not all schools in the Croxley Green area open up to the general public before requesting JUST one school to do so. There appears to be a vendetta against building a school without imposing the same requirements to the existing schools in Croxley Green.</i></p> <p>Please notify me of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
25	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
26	Resident	<p>As a parent of a child who will be attending Croxley Danes School in September, I am extremely concerned about the proposal for the school playing fields to be located elsewhere. I feel this is unacceptable as all children should be able to access playing fields on their school premises, especially in a world where so many children are suffering from childhood obesity.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
27	Resident	<p>My daughter is due to start Croxley Danes School this September. The</p>

		<p>first year the students will be having their lessons at St Clement Danes School and also for part of the second year.</p> <p>The schools are a few miles apart, so the children will go in coaches.</p> <p>I would like to object to the plan put forward by Croxley Green Neighbourhood Development Plan - Policy PR02.</p> <p>They want the playing fields not at the same site as the new school, Croxley Danes in Balwins Lane, and they have also put in other development constraints, which seem totally unnecessary.</p> <p>For safety reasons and logistics, the playing fields need to be on the same site as the school.</p> <p>As a parent I don't want there to be any unnecessary delays in building this much needed school.</p>
28	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I request to be notified of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
29	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to, the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
30	Resident	<p>I am writing as a parent of a child who has recently been offered and accepted a place at the new Croxley Danes School. I understand that the Parish Council has proposed a neighbourhood development plan which seeks to constrain the development of the Croxley Danes School site.</p> <p>The constraint that I most object to is the potential siting of playing fields elsewhere, separate to the main school site. I believe that participation in sport is an important part of school life and this will reduce the ability of children to participate in sport. Secondly making children travel to separate locations during the day reduces the time available to participate in the activity as well as the child safety issues surrounding the travel between the sites.</p>

		<p>In addition, the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
31	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I request to be notified of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
32	Resident	<p>I am a Parent with concerns regarding the Development site in Baldwins Lane Croxley Green and support the objections raised below communicated to me by Clement Danes school and wish these objections to be noted.</p> <p>I am an ex pupil of St Clement Danes School and have an interest in the site development as a future Educational Establishment with my daughter Kayla hoping to attend this school once development is completed.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>Amendments to Policy PR02 have subsequently been made in the Neighbourhood Development Plan. For example the original requirements that 'provision for playing fields is located off-site' and 'the northwest portion is safeguarded in perpetuity as an open space' have been relaxed to become considerations of a development proposal rather than specific requirements. However, it is the view of the Trust that these amendments to Policy PR02 should go further and these elements should be deleted entirely from Policy PR02 because the whole site has been allocated for educational use in the TRDC Local Development Plan and the retention of the land to the north as open land does not accord with the allocation. The Trust has consistently stated that any provision of off-site playing fields introduces a</p>

		<p>significant safeguarding risk to the students, which is wholly unnecessary. The Trust's duty of care to its students is paramount and should not be undermined through such considerations as those included in Policy PR02.</p> <p>The requirement that 'the school facilities are available for out of hours use by public' is a matter of operational management for the Trust, who will be responsible for the school facilities. The Trust will be required to undergo due diligence with regard to those parties seeking to use the facilities as a matter of safeguarding students and maintaining site security. The Trust will also be responsible for the ongoing cost of maintaining the school facilities. The public use of the facilities may be relevant to a planning application but is not relevant to the Neighbourhood Plan and therefore should be deleted from Policy PR02.</p> <p>The PR02 requirement that 'trees covered by the TPOs are retained and additional planting incorporated' takes further the relevant statement in the TRDC Site Allocation Local Development design that 'there are some mature trees and tree groupings on the site which should be retained where possible as part of any scheme'. The requirements relating to the 'landscape value', 'archaeology' and 'access, parking and road safety' are not necessary and unduly prescriptive, being matters pertaining to the planning determination process.</p>
33	Resident	<p>I am a parent whose daughter is attending Croxley Danes this September and would like to add this response to the decision to supply playing fields at a separate location to the school site</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p>
34	Resident	<p>I have been following closely the proposed development of land in Croxley Green to build an additional and necessary secondary school in the area.</p> <p>I am delighted that the land has been secured for the purpose and that the school has permission to go ahead with planning. The whole site has been obtained for this use and I am thankful that although a school will be built on this open land it will benefit a huge part of the community of Croxley Green.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning</i></p>

Guidance.

I feel, just by looking at St Clement Danes school you can see that the school will be developed in a particularly aesthetically pleasing way and that any trees will be conserved where possible or new trees planted in alternative locations to replace trees removed. However, I have now been made aware that the proposal that has been drawn up suggesting that the playing fields be at an alternative location. I have never heard anything so ridiculous! The land has all been secured for the school, there is sufficient space for the playing fields. However, instead of building the school with its playing fields on one site you would rather that children were taken by coach or walked to wherever it is that you propose having the playing fields. The playing fields are going to be an area of grassland, I cannot see how anyone in the village would be against the playing fields being on site! Building the school might not be in everyones interest, however, increasing traffic in and out of the school whilst the children are unnecessarily coached to alternative playing fields is just going to be wholly unnecessary. Putting added pressure on the roads throughout the day and also creating unnecessary risk to the children that are being transported or walked out of the school grounds. School grounds that are large enough to accommodate the fields.

To me, this feels like a way to later develop the land into housing that will put further unnecessary pressure on the village amenities (Drs!). It is very strange that there has been so much talk of housing being built on this land before the school secured the land. Then there was talk that the school would be built plus housing. Now that the land has been granted a change of use I am pretty sure it would be very easy for permission to be gained to build new homes as per the Government objective: *The government has today (7 February 2017) introduced bold new plans to fix the broken housing market and build more homes across England. (Housing White Paper 2017).*

The school needs to be built, we are lacking secondary schools, we are not lacking housing in Croxley. The school should be built and the playing fields should be on the site that was obtained for that use and is sufficiently big enough for that use. What is the point of building half a school. The curriculum demands that PE is included in childrens education. **The increasingly obese population is putting further strain on the already strained NHS and you are suggesting that a school be built without playing fields thus sending the message to the children that playing fields and physical exercise is an unnecessary addition to the school.**

Quite frankly this is an absolutely ridiculous and shocking change to the plans for the Croxley Danes School. Why sabotage what could be a highly successful addition to the village which the village can be proud of just so that you can keep the option of more housing in the village. I was so excited for this new school and was looking forward to the development of this site.

35	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to, the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>Amendments to Policy PR02 have been made in the Neighbourhood Development Plan. For example the original requirements that 'provision for playing fields is located off-site' and 'the northwest portion is safeguarded in perpetuity as an open space' have been relaxed to become considerations of a development proposal rather than specific requirements. However, it is my view that these amendments to Policy PR02 should go further and these elements should be deleted entirely from Policy PR02 because the whole site has been allocated for educational use in the TRDC Local Development Plan and the retention of the land to the north as open land does not accord with the allocation. Placing playing fields off-site is wholly impractical and poses a risk to the safeguarding of the students and it would increase traffic to and from the site unnecessarily.</p> <p>Policy PR02 requires that the 'proposals for the school site should be the subject of a planning brief devised by TRDC'. The Independent Examiner did not concur with this view and again it does not agree with the wording of the site allocation within the TRDC Local Development Plan.</p> <p>The Croxley Green Parish Council should regard the development as a much needed asset to the local community and highly preferable over housing development.</p> <p>I would like to be notified of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
36	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to, the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>Amendments to Policy PR02 have been made in the Neighbourhood Development Plan. For example the original requirements that 'provision for playing fields is located off-site' and 'the northwest portion is safeguarded in perpetuity as an open space' have been relaxed to become considerations of a development proposal rather</p>

		<p>than specific requirements. However, it is my view that these amendments to Policy PR02 should go further and these elements should be deleted entirely from Policy PR02 because the whole site has been allocated for educational use in the TRDC Local Development Plan and the retention of the land to the north as open land does not accord with the allocation. Placing playing fields off-site is wholly impractical and poses a risk to the safeguarding of the students and it would increase traffic to and from the site unnecessarily.</p> <p>Policy PR02 requires that the 'proposals for the school site should be the subject of a planning brief devised by TRDC'. The Independent Examiner did not concur with this view and again it does not agree with the wording of the site allocation within the TRDC Local Development Plan.</p> <p>The Croxley Green Parish Council should regard the development as a much needed asset to the local community and highly preferable over housing development.</p>
37	Resident	<p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I object to your inclusion of giving consideration to off site playing fields.</p>
38	Resident	<p>I am writing in response to the Public Consultation of the Croxley Green NDP.</p> <p>I believe the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>As the parent of a prospective pupil at the Croxley Danes School I was also concerned to read that the additional considerations of Policy PR02 suggest an off-site playing field which I strongly believe would introduce a significant safeguarding risk to students. My understanding is that the whole site has been allocated for educational use in the TRDC Local Development Plan and the retention of the land to the north as open land does not accord with the allocation. It is my view that these elements should be removed from the policy.</p> <p>I would ask that I remain advised of any amendments to Policy PR02.</p>

39	Resident	<p>As a parent of a child who will be attending Croxley Danes from September 2017. I wish to make the following points to the consultation that had been brought to our attention.</p> <p>Additional constraints which relate to the permanent site of Croxley Danes School do not conform to the strategic objectives of the Three Rivers District local development plan. Policy PR02 is not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I would also like to add that I do not feel it would be safe for the children to travel to playing fields located on a different site. I firmly believe this places an unnecessary significant risk to the pupils when there is clearly the space on sight.</p>
40	Resident	<p>As parents/ guardians of prospective pupils, I think that the requirements of Policy PR02 in the Croxley Green Neighbourhood Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to ,and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
41	Resident	<p>As a future parent of Croxley Danes School I am writing to voice my objection to the Croxley Green Parish Council Proposals.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p>I would like to request to be notified of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
42	Hertfordshire County Council Public Health	<p>Re: Croxley Green Neighbourhood Plan 2017-2032 consultation</p> <p>Thank you for the opportunity to comment on the above. This letter provides the Public Health advice in response to the consultation on the Croxley Green Neighbourhood Plan.</p> <p>In summary, Public Health endorses a number of policies and aims in the proposed Plan, recognising the important role that good quality development plays in health and wellbeing. This is particularly so for more vulnerable members of our community and communities that experience health inequalities.</p> <p>This letter sets out our comments and advice in relation to a number of key health and wellbeing themes.</p> <p>Health and planning</p> <p>Building health into our urban environments is a vital step towards</p>

		<p>delivering longer term improvements in health across the whole of society. This can be as important as investment in medical interventions. By building health into planning we seek to address some of the causes of poor health from the outset.</p> <p>The National Planning Practice Guidance¹ states that:</p> <p>1 https://www.gov.uk/guidance/health-and-wellbeing</p> <p>☑ A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage: Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport.</p> <p>☑ The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.</p> <p>2</p> <p>The County Council’s Public Health Department has prepared a Health and Wellbeing Planning Guidance document defining its expectations to developers in the delivery of healthy development and communities, with signposts to further advice. This will be available shortly at www.hertfordshire.gov.uk/healthyplaces , focussing on the principle of ‘<i>designing in</i>’ health and well-being as an essential part of the planning process, placing specific emphasis on active travel, multi-functional open space and high quality urban environments.</p> <p>The Neighbourhood Plan should set out a clear expectation to future development of the need to maximise the impact the it can make in promoting good physical health and mental wellbeing. This should have regard to the necessary infrastructure to encourage physical exercise, healthy lifestyles, behaviours and choices. The Plan could signpost to the Hertfordshire Health, Wellbeing and Planning guidance, which would provide broad support for the Plan’s policies and would be a positive reflection of Chapter 8 of the National Planning Policy Framework.</p> <p>Neighbourhood Plan Policies and Aims - Comments</p> <p>Aim HO2 – Accessibility and Policy HO3 – Lifetime neighbourhoods</p> <p>The Policy is seeking to develop Lifetime Neighbourhoods, which we support. However it is not clear if the Policy is further seeking future development to be Lifetime Homes compliant; an approach which is commendable for the benefits it should offer a sustainable and healthy community.</p> <p>These policies should be outlining an expectation that development is for all ages – so as to meet the needs of a changing population and different ages/stages of life. Whilst the Plan recognises the challenge of an ageing population, it would benefit from a broader consideration of the needs of other age groups.</p> <p>The proposed Plan makes little reference to the needs of the children</p>
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		<p>and young families who, through new development, may eventually reside in Croxley Green. The Plan may benefit from further consideration of the needs of this particular community.</p> <p>Nationally, there has been a big decline in the amount of outdoor activity by children, whilst we're seeing increasing levels of child obesity. How will the Plan's aspiration for Lifetime Neighbourhoods cross-reference with other policies (including LC1 – Protection of sporting, recreation, leisure and health facilities; RO1 – Open Space and Aim RO2 – Safeguarding recreational land) to ensure outdoor play opportunities, particularly child-led free play that is not in a designated space?</p> <p>Policy HO7 – Energy Efficiency</p> <p>We know that cold homes directly result in poor health outcomes and cost the NHS £848 million². We therefore fully support the inclusion therefore any policy that seeks to tackle fuel poverty and poor housing quality.</p> <p>² BRE (2015) https://www.gov.uk/government/collections/housing-for-health</p> <p>Policy HO8 – Connections to existing footpaths and cycle ways in new developments</p> <p>Designing in physical activity, active travel and healthy choices should be an integral part of any development. It is therefore encouraging to see that Policy HO8 is seeking connections to the existing community. It could also consider seeking to ensure that appropriate cycle storage is built into the development, that pedestrian movement is encouraged through development design, with design features further supported by requiring appropriate signage for pedestrian/cycle routes towards key local destinations and rights of way. ³</p> <p>Policy RO1 – Open space for new housing developments</p> <p>Open space, when we get it right, offers economic, social and environmental benefits. Therefore, the inclusion of Policy RO1 is important. Too often, however, ambition is not met by reality, resulting in wasted space – 'spaces left over after planning'. We'd hope that this policy leads to development which:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Is accessible to the whole community to enjoy outdoor space, encouraging social engagement <input checked="" type="checkbox"/> Clearly delineates between public and private open space <input checked="" type="checkbox"/> Offers open space that is as permissive and inclusive as possible <p>Aim TP1 – Road safety and control of parking.</p> <p>Vehicle dominance can blight residential areas, and green spaces can often suffer from anti-social parking, whilst safety concerns often deter people from choosing to walk or cycle. The aims of TP1 are therefore considered important. Consideration might also be given to requiring – where appropriate – development to incorporate Homezones in order to limit vehicle speeds, tackle poor parking choices and prioritise pedestrian movement. This approach - making it a place for people - if implemented fully would be seen as best practice.</p>
43	Resident	I am very disappointed to see that the Croxley Green Parish Council

		<p>have raised objections against the proposed siting of Croxley Green Danes school which if upheld would be detrimental to the education of the children attending the school.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I feel that Croxley Danes application should be supported in full and the School and playing fields built on the proposed site in Baldwins Lane.</p>
44	Resident	<p>I have been made aware of the public consultation taking place regarding the plans for the much needed Croxley Danes Secondary School. As a parent of two children I believe that the provision of education is one of the most important pillars of a democratic and civic society. Education needs to be seeing in its entirety, and that should include the provision of playing fields, etc., for the kids on site. Having the play areas and others built somewhere else compromises education and the safety of the children.</p> <p><i>As it has been pointed out, the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p>I do hope that the welfare of the children are given priority and that the constraints added by the Croxley Neighbourhood Development Plan, which has overly prescriptive points about matters such as the conservation of tree and archeological surveys, are not given undue weight in considering the provision of education to the children of Croxley Green.</p> <p>I would be very grateful if you could notify me of the Local Planning Authority's decision under regulation 19 of the Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</p>
45	Historic England	<p>RE: Croxley Green Neighbourhood Development Plan 2017-2032 Consultation</p> <p>Thank you for your letter of 21 April 2017, regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of</p>

		<p>the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Croxley Green Neighbourhood Development Plan 2017-2032 document (NDP).</p> <p>In general, we welcome this comprehensive and informative NDP document, which includes general reference to the history and character of Croxley Green throughout, as well as paying attention to the area's character and heritage. In particular, the identification of character zones within the area is welcomed as a useful addition that enhances clarity. However, we would like to make the following comments.</p> <p>Where the NDP refers to heritage in terms of the built environment, we would recommend using the phrase '<i>historic environment</i>', in line with National Planning Policy Framework (NPPF) terminology. Specifically, this would refer to Paragraph 3.1.2 and the Development Management Policy listed under Paragraph 5.1.</p> <p>In line with NPPF policy for plan making (Paragraph 157), neighbourhood development plans should contain a clear strategy for the enhancement of the historic environment throughout. We are therefore pleased to note that the enhancement of Croxley Green's historic environment is well represented throughout the document. We would, however, recommend that the NDP's High Level Aspirations make specific reference to the historic environment, and suggest rewording the third bullet point to read "<i>To ensure that future development in the neighbourhood area protects or enhances Croxley Green and elements that contribute positively to its historic environment</i>".</p> <p>We would also recommend that the first bullet point under Policy PRO4: Killingdown Farm Development Site is reworded to say "<i>preserves or enhances the Conservation Area and the setting of listed buildings, and respects the natural features</i>".</p> <p>The Croxley Green neighbourhood area includes a number of designated heritage assets including:</p> <ul style="list-style-type: none">☐ Croxley Green Conservation Area☐ Dickinson Square Conservation Area☐ 21 Grade II Listed Buildings (16 of which are in Croxley Green Conservation Area)☐ It is also bounded by the Cassiobury Park Grade II Registered Park and Garden to the north-east. <p>We would recommend that the NDP clearly identifies these designated heritage assets, including a map showing their locations. The NDP also does not identify any non-designated heritage assets, such as Locally Listed Buildings, or buildings identified in the Croxley Green and Dickinson Square conservation area appraisals. We would suggest that the NDP references these and how they contribute to the character</p>
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and appearance of the area. This would help to highlight their importance and provide an opportunity to identify any potential for enhancement. .

We welcome the reference to below ground archaeology in Policy PRO2: Proposed Croxley Danes School Site, but would suggest that, in line with National Planning Practice Guidance, general information is provided about local non-designated heritage assets of archaeological interest, in order to guide decisions. It is also recommended that appropriate mention is made of below ground archaeological considerations in Section 5, under the Development Management Policies CA1 and CA2 for New Developments and Extensions to Existing Buildings and Conversions. If you have not already done so, we would recommend that you speak to the staff at Hertfordshire County Council Archaeological Service who manage the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also locally-important non-designated heritage assets, including archaeological remains and landscapes in the neighbourhood area. Some Historic Environment Record information may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk/>>).

We welcome the inclusion of Aims HO6 and HO7 regarding the reduction of the carbon footprint and improving energy efficiency. We would, however, recommend that reference is made to the fact that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance, or harm their significance. Special considerations under Part L of the Regulations are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any guidance encouraging energy efficiency should note that the application of measures will therefore be different with respect to these classes of buildings and structures.

Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings, which is available to download here: <<https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl>>.

We recommend the inclusion of a glossary containing relevant terminology contained in the NPPF, in addition to details about the additional legislation and policy protections that heritage assets enjoy.

		<p>We would also suggest that the NPD provides links to these relevant Historic England documents:</p> <p>HE Advice Note 2 - making changes to heritage assets: https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/</p> <p>HE Good Practice Advice in Planning 3 - the setting of heritage assets: https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf</p> <p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This can be found at:</p> <p>http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>Finally, we should like to stress that this advice is based on the information provided by Three Rivers District Council in your email of 21 April 2017. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NDP, where we consider these would have an adverse effect on the historic environment.</p>
46	Resident	<p>As a parent of a child that will be starting at Croxley Danes School from Sept 2017, I would like to stipulate that I completely endorse and support the attached letter from the chair of Danes Educational Trust. Please see the attached PDF document “Danes-Educational-Trust-response-to-public-consultation-24th-May-2017” dated 19 May 2017.</p> <p>I would also like to emphasise that the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I am also personally concerned about the detrimental effect of the school playing fields being “detached” from main school premises, and the negative consequences that this might have to the education & general welfare of children and to the activities of parents and staff associated with the school. From my own research, I am aware that the Government’s Department for Education (DfE) emphasise that where possible playing fields and sports facilities should be “attached” to the school.</p>
47	Education Funding Agency	Croxley Green Neighbourhood Plan: Submission Draft. Submission of the Education Funding Agency

		<p>1. The EFA was established in 2012 in order to help the government achieve its schools objectives by delivering effective capital programmes that improve the condition of existing buildings and support the creation of new places for pupils and learners. We manage £54 billion of funding a year to support all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.</p> <p>2. The EFA aims to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. Whilst neither the EFA nor the school trust have been consulted to date we welcome this opportunity to comment on the emerging neighbourhood plan, particularly on Policy PRO2 (proposed Croxley Danes school site).</p> <p>3. The EFA has and continues to work closely with the school trust and Hertfordshire County Council as education authority to deliver a new secondary free school on the allocated site to the north east of Baldwins Lane, Croxley Green. As such, we would like to offer the following comments in response to the above proposed policy:</p> <p>Meeting the basic conditions test</p> <p>4. A neighbourhood plan must meet a number of basic conditions in order to progress. These are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>5. These conditions include having regard to national policies and guidance and being in general conformity with the strategic priorities and policies within the development plan. Strategic priorities can include the provision of community facilities (which includes education). The Local Plan seeks to ensure such provision via the formal allocation of a number of sites including the site to the north east of Baldwins Lane for a new secondary school.</p> <p>6. The allocation identifies the whole site for an educational use with a build zone to the south of the site having been removed from the Green Belt. Land to the north of this is shown as playing field on the accompanying allocation plan. The accompanying comments advise that due to the topography of the site that detached playing fields may be required to the north of the site to make up any 2 deficit on site. It also states that existing trees should be retained where possible.</p> <p>7. In comparison, Neighbourhood Plan Policy PRO2 seeks to take this further. This states, inter alia, that provision for playing fields should be off-site; that all protected trees must be retained and that land within the north-west corner of the site should be retained as open</p>
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		<p>land in perpetuity. It also seeks to impose an additional requirement that any development of the site be subject to a planning brief.</p> <p>8. The effect of these additional requirements is to constrain the development of the site by introducing restrictions that do not comply with the allocation within the Local Plan. This creates a significant barrier to developing the site for a secondary school and could render the site unviable. In this respect, the School Trust has consistently stated that off-site playing field introduce significant and unnecessary safeguarding risks to students.</p> <p>9. Such an approach does not comply with advice within the National Planning Policy Framework (NPPF). Paragraph 184 of the NPPF states that neighbourhood plans should not promote “less development” than set out in the local plan or seek to undermine its strategic objectives. This lack of conformity with the local plan means that the Neighbourhood Plan (as currently drafted) fails to meet one of the basic conditions.</p> <p>10. The EFA therefore objects to the current wording of Policy PRO2 and would urge the policy to be redrafted before the plan progresses any further to ensure a compliant policy that supports an important aim of the Local Plan to ensure sufficient school places within the District. The EFA would be particularly interested in responding to any review of this policy. As such, please add me to your database as the EFA contact for this matter.</p> <p>11. Finally, I hope the above comments are helpful in shaping the Croxley Green Neighbourhood Plan. Please advise the EFA of any proposed changes to Policy PRO2 or supporting text arising from these comments.</p>
48	Resident	<p>As a resident of Croxley Green and parent of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PRO2 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PRO2 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PRO2 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust</p> <p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible</p>

		<p>after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>
49	Hertfordshire County Council Libraries and Heritage	<p>Hertfordshire County Council (Libraries and Heritage Services) supports the aspirations of the Croxley Green Neighbourhood Plan to keep a family-friendly community in which people can live, work and flourish. We also share the village’s vision of the Croxley Green Library as a community asset that can support their aspirations and ambitions. Social and technological change is having a huge impact on the shaping of Hertfordshire’s towns and villages and we recognise that, as these changes take effect, communities want and deserve a greater say in the shaping and delivery of their local services. In 2014 our ‘Future of Hertfordshire Libraries’ public consultation showed that people see their local libraries as important community hubs that provide a vital space for wider community activities and events, as well as providing traditional library services. The consultation also revealed the value placed on libraries in smaller communities such as Croxley Green as local amenities and social venues that can help to combat social isolation.</p> <p>Hertfordshire County Council believes that public libraries have an important role to play in the life of town and village centres and communities such as Croxley Green. One of the primary aims of our “Inspiring Libraries, 2014-2024” strategy is for each one of our public libraries to be vibrant community assets, where libraries are shaped with local people and partners to reflect local need, support sustainability and enrich communities. Our vision and aim is for public libraries in Hertfordshire to be enhanced gateways to reading, information and wellbeing that support people’s personal development, enabling citizens of all ages to learn new skills. We therefore welcome the opportunity to work with Croxley Green Parish Council, Three Rivers District Council and the people of Croxley Green to <i>“increase and diversify the use of the Library to accommodate adult education and community activities.”</i></p> <p>We very much see Croxley Green Library as being a community asset that provides space and expertise to support learning, business and academic research, whilst helping people to access the information they need to make decisions about their everyday lives. We are open to and welcome the continuing prospect of working with a range of partners in order to increase and diversify use of Croxley Green Library. Libraries and Heritage Services already works with Croxley Green Parish Council to enable use of the square in which the library stands for the parish Christmas tree and Christmas market stalls and we are open to exploring further ways in which this valuable public space can be exploited for the benefit of the local community. The current Library building (built in the 1990s, rather than the 1980s, as stated in the Neighbourhood Plan), is well located in the town, and provides a bright and attractive space, flexibly designed with a meeting room and IT suite that is available for hire by community</p>

		<p>groups inside and outside library opening hours. Libraries and Heritage Services is keen to increase use of this space and will be happy to explore new opportunities with community partners.</p> <p>With regards to increasing access to the library as a community resource, we recognise the concern expressed in the neighbourhood plan by the comment that “some facilities like the library are only open for short periods” [section 6.1.2] and the description of the library and its square as “an underused community asset”.</p> <p>We recognise that many communities want longer and more convenient library opening hours, and our challenge is to meet this need at a time of increasing pressure on public finances. One of the ways that we are using to try to increase access to the library is through imaginative use of digital technology and Croxley Green Library is playing a key role in this development. In 2016 LHS started an experiment using new technology called Open+ to increase opening hours in Croxley Green Library in a cost-effective way. Open+ means that Croxley Green residents can use their library tickets as “swipe cards” to enter the library at times when it would ordinarily be closed so that they can make use of the self-service facilities, including borrowing and returning books, using the public computers and using the study and free Wi-Fi facilities. To date the Open+ service has extended access to the library by 17 hours a week (50%) by opening early in the morning (from 7.00am). During 2017, it is our intention to extend self-service access further to include evenings and Thursdays when the library is normally closed, thereby more than doubling access hours. By embracing technology in this way, we aim to meet the community desire expressed in the Croxley Green neighbourhood plan to increase access to the library and to enhance its availability as a community asset still further. We would welcome the opportunity to enhance this additional access by working with local community groups and volunteers who would like to support people in using these self-service community facilities.</p>
50	Hertfordshire County Council Property	<p>The following representations are made by Hertfordshire County Council Property (Development Services) (HCC hereafter) on behalf of the County Council services.</p> <p>1.0 Background</p> <p>1.1 HCC sent a letter dated 13 February 2017 to express concerns regarding the content and policies included in the submission draft of the Croxley Green Neighbourhood Plan.</p> <p>1.2 It is noted that consideration does not seem to have been given to the objections HCC made in our letter of 13 February, with only minimal changes having been made to Policy PRO2 of the current Croxley Green Neighbourhood Plan (2017-2032) (revised 31 March 2017).</p> <p>1.3 As a consequence HCC formally object to the Croxley Green Neighbourhood Plan on the grounds of soundness. The</p>

		<p>objections, as outlined in our letter in February, are listed below.</p> <p>2.0 General conformity with National policies – NPPG</p> <p>2.1 According to Paragraph: 047 of the National Planning Policy Guidance (NPPG), a qualifying body should be inclusive and open in the preparation of itsneighbourhood plan or Order and ensure that the wider community:</p> <ul style="list-style-type: none"> • is kept fully informed of what is being proposed • is able to make their views known throughout the process • has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order • is made aware of how their views have informed the draft neighbourhood plan or Order. <p>2.2 The NPPG further suggests in paragraph 049 that the document that is consulted on at the pre-submission stage should contain only the preferred approach.</p> <p>2.3 HCC notice that major modifications have been made to the three iterations of the plan: submission draft (v04), (v05C) and the final 19 January 2017 version. These submission draft documents have included some new policies in Section 6 and additional text throughout the document. Although reasons have been given in Section 4.4 of the consultation statement to explain why those additions have to be made, the level of changes in the document are considered to be fairly significant, and as such HCC strongly believe that an additional consultation should be carried out.</p> <p>2.4 HCC considered that the submission version of the Croxley Green Neighbourhood Plan does not follow the NPPG which emphasises that the preparation of the neighbourhood plan should be inclusive and open, and should contain only the preferred approach.</p> <p>3.0 General conformity with the local plan</p> <p>3.1 Once a neighbourhood development plan is submitted to the Local Planning Authority (LPA) for independent examination, in this case Three Rivers District Council (TRDC), the LPA must satisfy itself that a draft neighbourhood plan or Order complies with all the relevant statutory requirements.</p> <p>3.2 Under the Planning and Compulsory Purchase Act 2004 (Section 38B(3)), if a policy set out in a neighbourhood development plan conflicts with any other statement or information in the plan, the conflict must be resolved in favour of the policy.</p>
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		<p>(e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>(f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>(g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p> <p>4.2 HCC consider that the current Croxley Green Neighbourhood Plan submitted to TRDC on 24 January 2017 does not comply to criterion (a) and (e) of the basic conditions, for the reasons set out in section 2 and section 3 in above.</p> <p>4.3 As a result, HCC considers that the Croxley Green Neighbourhood Plan has failed to comply with the criteria set out in the basic conditions test.</p> <p>5.0 Recommendation</p> <p>5.1 HCC would suggest that Croxley Green Parish Council withdraw the Neighbourhood Plan and make essential amendments to Policy PRO2. HCC Property would like to be consulted on all future documents.</p>
51	Resident	<p>As a resident of Croxley Green and parent of a prospective pupil of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust</p> <p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>

52	Resident	<p>As a resident of Croxley Green and parents of one daughter who is starting at Croxley Danes School in September, as well as another younger daughter, we strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>We also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust.</p> <p>We are delighted that Croxley Danes School are accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>
53	Resident	<p>As a resident of Croxley Green and parent of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust</p> <p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in</p>

		September this year and in future years. I look forward to hearing the results of the consultation.
54	Hertfordshire County Council Highways Operations & Strategy	<p>2.7 - The latest Traffic & Transport Data Report (based on 2015 data) is available at:</p> <p>https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/speed-awareness-and-driver-training/transport-and-accident-data/transport-and-accident-data.aspx</p> <p>The most recent Hertfordshire County Travel Survey was undertaken in 2015 and the results by district are available at the above web address, or by contacting gary.beaumont@hertfordshire.gov.uk.</p> <p>2.7.3 - Says the Grand Union Canal ‘is now used almost exclusively for pleasure boating’. The canal towpath should be seen as a valuable asset for walking and cycling.</p> <p>Policy HO8 - We support the proposed <i>Policy HO8: Connections to existing footpaths and cycle ways in new developments</i>, which is necessary to enable journeys by active and sustainable modes.</p> <p>5.3 - The Neighbourhood Plan’s aims and policies with respect to retaining community facilities and amenities is welcome and recognised as important for sustainable communities (including reducing people’s need to travel so far or so often and encouraging non-car journeys).</p> <p>5.4 - In relation to parking provision. The data presented in section 2.7 indicates the high car ownership and usage levels for Croxley Green. It is worthwhile keeping in mind that parking availability and cost is linked with the number of journeys people choose to make by car. The amount of car parking also has an impact on how much space is available for other land uses and other travel modes. Car parking (formal, informal and nuisance) and car traffic also influences how easy and attractive it is for people to get around on foot or cycle (for instance). Although the Neighbourhood Plan is seeking to meet an existing and potentially growing demand for car parking, it should be recognised that this could be detrimental to the Plan’s objectives, including in terms of sustainability, the local environment and amenity.</p> <p>5.6 - HCC supports the first objective, which is consistent with the Hertfordshire Local Transport Plan – ‘Ensure the needs of those relying on public transport and pedestrians and cyclists are given priority over private vehicles’. However it is recommended to change the word ‘relying’ to ‘using’ – as although some people do rely on public transport, it can also be a choice.</p> <p>The second and third objectives should be considered in the context of the Neighbourhood Plan’s wider stated objectives and aspirations and</p>

		<p>recognising the potential trade-offs for sustainable travel. See comments above (5.4).</p> <p>The second bullet relates to people ‘relying’ on cars. As with the comment above, although for some a car is a requirement for their mobility or work needs, it is often a choice to have and use a car.</p> <p>Aim TP1 Road Safety and control of parking - We are generally supportive of this aim.</p> <p>Changes to speed limits including introduction or extension of 20mph zones must be in accordance with HCC’s Speed Management Strategy.</p> <p>Although car clubs are welcome in principle and operate successfully in some places, we are aware that they have struggled to operate sustainably in many locations where they have been tried. The context and model needs to be given careful thought bearing in mind likely success factors.</p> <p>Recommend adding a bullet point on Travel Plans. Travel Plans assist in bringing together tailored, site-specific interventions to support and enable sustainable travel. This can include marketing and promotion, investment in facilities (cycle parking, lockers, changing facilities etc.), initiatives such as car clubs and cycle hire, and parking management policies. Hertfordshire County Council requires Travel Plans for new developments over a threshold size. Travel Plans can also be developed by existing businesses and workplaces, schools, stations, community organisations etc., to help them manage their travel impact.</p> <p>5.7 - Although the objectives and aims with respect to retaining front gardens are understandable and consistent with the Neighbourhoods Plan’s objectives for the area, it is not clear how Aim FG1 can be managed in reality</p> <p>Aim SF1 Street Furniture - Hertfordshire County Council’s highway assets (which include road signage and street lighting) are maintained in accordance with HCC’s policies and agreed approaches - information on this is available in the Highways Service Guide 2016.</p> <p>The potential benefits of ‘decluttering’ (both in terms of local visual amenity and maintenance needs) are recognised and opportunities to rationalise signage etc. as part of Highway schemes can be considered, but are likely to depend on circumstances on a scheme-by-scheme basis.</p> <p>Aim TL2 Street Trees - HCC’s policy on Highway Trees, including new planting, is set out in the ‘Highway Tree Strategy and Guidance Document’ – available at https://www.hertfordshire.gov.uk/about-the-council/freedom-of-information-and-council-data/open-data-statistics-about-hertfordshire/what-our-priorities-are-and-how-were-</p>
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		<p>doing/highways-plans-and-strategies.aspx</p> <p>Aim PRO1 Croxley Green Centre - The intent for Croxley Green Centre is welcome. An Action Plan developed with the key stakeholders would be sensible, however progress would depend on suitable funding being available.</p> <p>The Neighbourhood Plan's aspirations for the 'village centre' would be more likely to be achieved through a comprehensive, planned approach rather than piecemeal development, even if the project can only be delivered in stages.</p> <p>Aim PRO6 Met Line Extension Surplus Land - The old Croxley Green station site (Note 47) is currently owned by Network Rail. Ownership would only transfer to Hertfordshire County Council under a property agreement relating to MLX (formerly Croxley Rail Link). The Croxley Rail Link Order 2013 (clause 36) repeals so much of the 1907 Act as affected by the scheme on the former Croxley Green Branch line (including the former Croxley Green station site) - if the land does not transfer the 1907 Act would continue to apply.</p> <p>Three Rivers District Council, as part of the consultation for the MLX scheme, set out that it would wish to see the Croxley Green station embankment retained as a visual and environmental screen of the viaduct from neighbouring properties. Although we are not aware that this was an MLX planning requirement, Three Rivers District Council may wish to confirm their position.</p> <p>The land under the viaduct is likely to be acquired by Transport for London for the MLX scheme, to ensure that they have adequate interests in the land for the maintenance and operation of the railway. The use, if permitted, of any area below the viaduct is likely to be subject to terms and conditions set down by TfL.</p> <p>Hertfordshire County Council Estates, as would-be landowner, will need to comment on the plan to bring the former Croxley Green Station site into beneficial community use. (Contact Dick Bowler, Hertfordshire County Council Estates Manager)</p>
55	Resident	<p>I wish to communicate my feelings regarding the Croxley Green Neighbourhood Development Plan.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also wish to make it clear that I strongly disagree with the proposal to</p>

		<p>sight the playing fields, for Croxley Danes, in a different location. I have several objections to this proposal:-</p> <ul style="list-style-type: none"> • Any form of split education sites increase the risk of Safeguarding the pupils. Managing the movement and monitoring of pupils is more complicated when dual sites are involved. • Moving pupils between sites is an increased drain on resources <ul style="list-style-type: none"> - ○ Cost - if transport is required, this incurs additional costs. Schools are under increasing budget and funding restrictions and committing any school to additional, unnecessary costs should be avoided where ever possible. ○ Environment - if transport is required this will add to the vehicle pollution and congestion in the area. ○ Time - travel between sites will use up significant amount of the pupils' and teachers' time. Pupils and schools already struggle to cram the curriculum and necessary work into the school day. • The Nation has increasing issues with children not having enough exercise. Restricting the pupils' access to playing fields can only have a detrimental effect on their health. <p>It seems that the reason to locate the playing fields off site would be to enable houses to also be built on the Croxley Danes site. I understand that there is a shortage of housing and local authorities have targets to meet. However, the decision to locate the School's playing fields on a different site will have an adverse affect on all the pupils at that school for the next 10, 20 or possibly 50 years. It would be easy for the authorities to cram hundreds of house on the site but it would not actually be in anyone else's best interest.</p>
56	Resident	<p>As parents of a prospective pupil of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust</p>

		<p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>
57	Resident	<p>As a resident of Baldwins Lane Croxley Green and parent of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust.</p> <p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>
58	Resident	<p>As a parent of a daughter who will be attending Croxley Danes School I am concerned by the Croxley Green Parish Councils development plan because:</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance. The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District</p>

		<p>Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>
59	Resident	<p>As a resident of Baldwins Lane Croxley Green and parent of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust.</p> <p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>
60	Resident	<p>As a resident of 75 Sherborne Way, Croxley Green and an Uncle of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust.</p> <p>I am delighted that Croxley Danes School will be accepting pupils from</p>

		<p>September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p>
61	Resident	<p>We are commenting as parents of a child due to start at Croxley Danes School in the first cohort in September 2017. Our comments relate to Policy PR02: Proposed Croxley Danes School site in the Croxley Green Neighbourhood Development Plan.</p> <p>We fully concur with the letter submitted by the Danes Educational Trust to the Economic and Sustainable Development department, dated 19th May 2017. There is no need to re-state each point here.</p> <p>The current wording of Policy PR02 is too prescriptive and puts additional constraints on the permanent site for Croxley Danes School. Therefore, the policy does not conform to the strategic objectives of the Three Rivers District Council Local Development Plan and is not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>The Danes Educational Trust was not informed or consulted during the preparation of the Croxley Green Neighbourhood Development Plan and it is not listed as a Stakeholder in Croxley Green Parish Council's consultation statement (Annex H). This is a serious omission since the building of Croxley Danes School is a major project occurring in Croxley Green in the next few years and the presence of a new secondary school is a major change for the local community. We suggest that Policy PR02 be re-written in consultation with the Danes Educational Trust and its partners. We understand that Croxley Green Parish Council has concerns including building on green space, tree preservation and road safety. There will be ample opportunity to address these concerns during the normal planning application and consultation process. Such local objections should not be enshrined in the Neighbourhood Development Plan whose scope runs until 2032. The current wording is too prescriptive and could hinder progress with the permanent school site. As parents of the school, we wish to see smooth and steady progress with the new site and not have to endure delays and uncertainty which might impact on our child's education.</p>
62	Frankland Road Allotment Association	<p>Thank you for your consultation letter concerning the Croxley Green Neighbourhood plan.</p> <p>On behalf of the Frankland Road Allotment Association, I can confirm that we fully support the Plan as shown on your website in so far as it affects our association.</p>
63	Resident	<p>I would like to formally register my feelings concerning the Croxley</p>

		<p>Green Neighbourhood Development Plan.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>Additionally, I totally disagree with the recommendation to site the playing fields for Croxley Danes elsewhere, my objections to this proposal are detailed below:</p> <ul style="list-style-type: none"> • The safeguarding the pupils should be of paramount importance; there is an increased risk over the children's safety due to the complexity of split sites. • The management of the moving & monitoring of pupils between sites is a drain on teaching staff &/or other resources, which could be better utilised elsewhere. • Physically 'having to' move (by car, bus, etc.) incurs an expense which would have to either be raised or go against an already tight budget, unnecessarily. • There are environmental factors to consider: additional cars/buses transporting pupils around different sites adds to increased pollution & traffic for the area. • The time spent transporting pupils from one site to another is purely "wasted time" ; this could be (and <u>should be</u>) better spent on learning, exercise, etc. <p>I would also like to register my disapproval of houses being built on the Croxley Danes site. I accept the fact that there is a shortage of affordable housing and all local authorities are under pressure to meet goals of providing this, however <u>I do not accept</u> that housing should be built on the site, where the school playing fields should be located. This would appear to be "an easy option" for the local authority to build houses on the site and achieve their target; however surely the long range solution is to build a school with playing fields on one site, and then look at remaining space for housing, either there or elsewhere.</p>
64	Resident	<p>As a resident of Croxley Green and parent of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning</p>

		<p>Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of trees and archaeological surveys, for the reasons outlined in the submission by The Danes Educational Trust</p> <p>I am delighted that Croxley Danes School will be accepting pupils from September this year and I appreciate the considerable efforts made by the council, the Trust and the local residents that made this possible after the disappointing veto of the original plans to open the school. I trust that no further delays or changes of plan will affect admission arrangements for children starting at Croxley Danes School in September this year and in future years. I look forward to hearing the results of the consultation.</p> <p>Yours faithfully</p>
65	Resident	<p>I am a parent and here by supports the School's objection to Croxley Green Parish Council drafted Neighbourhood Development Plan.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to, the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p>
66	Canal & River Trust	<p>Thank you for consulting the Canal & River Trust on the submission version of the Croxley Green Neighbourhood Development Plan. The Trust has a range of charitable objects including;</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; • <input checked="" type="checkbox"/> To protect and conserve objects and buildings of heritage interest; • <input checked="" type="checkbox"/> To further the conservation, protection and improvement of the natural environment of the inland waterways; and • <input checked="" type="checkbox"/> To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. <p>The Grand Union Canal runs through the heart of the Croxley Green Neighborhood plan area and the area also includes Bridgwater Basin which provides a good range of services for boaters.</p> <p>We note that the Canal is valued by the local community and that the plan recognises that the Three Rivers Local plan considers te canal one of its most important Green infrastructure assets. The Neighbourhood Plan mentions at paragraph B.13.12 that the canal bank and the towpath, the locks and the bridges together with the grassed verges and tree belts within the canal built C1790. We assume that the paragraph was intended to read 'within the canal corridor'.</p> <p>We note that Policy CA5 suggests that lock 79 (Common Moor Lock</p>

		<p>and nearby canal edge (formerly a wharf) should be considered as a landmark building. Later paragraph B.13.5 states that the canal has no special protection apart from the Lockkeepers house and Lock 78. The paragraph mentions that there is a strong case for the possible designation of the canal as a Conservation Area but that in the meantime 'the Council will need to be vigilant about any changes proposed by the Canal & River Trust'.</p> <p>As mentioned above one of the Trusts main charitable objectives is to protect and conserve objects or buildings of historic interest, regardless of whether they have a statutory protection by being a listed building or within a Conservation Area.</p> <p>The Trust has an exemplary record in conservation and legal compliance and we are progressing with Historic England and the Department for Communities and Local Government towards a National Listed Building Consent Order. The Order, the first of its kind, would allow the Trust to make repairs to its masonry and brick structures without having to gain individual consents, allowing repairs to be made more quickly and saving both time and money. The Trust has a published heritage policy which can be accessed here</p> <p>The Trust is the Statutory undertaker with responsibility for regulating navigation on this waterway. Our primary duty, as set out in S10 of the transport Act 1962 is to 'provide to such an extent as they feel expedient services and facilities on the inland waterways owned or managed by them'. We benefit from permitted development right under the Town & Country Planning (General Permitted Development) order 1995.</p> <p>When it is necessary to carry out work to our operational assets we ensure that it is carried out in line with our own guidance and charitable objectives. We feel it is therefore unnecessary for the Neighbourhood plan to state a need to be 'vigilant' to any changes proposed by the Trust as we feel this sentence could be perceived to have negative connotations regarding the Parish Councils views of the Trust. We suggest that this sentence should be removed.</p> <p>The Trust would however welcome further discussions with the Parish Council and Three Rivers District Council regarding the designation of this part of the Grand Union Canal as a Conservation Area and have no objection to the council considering lock 79 and the nearby wharf as landmark buildings.</p>
67	Resident	<p>As a resident of Croxley Green and parent of two prospective pupils of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of</p>

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68	Hertfordshire County Council Minerals & Waste	<p>Consultation for Croxley Green Neighbourhood Development Plan (NDP), 2017-2032.</p> <p>I am writing in response to the above Neighbourhood Plan for Croxley Green and provide comments on behalf of the Minerals and Waste Planning Authority.</p> <p>Comments were provided previously on the Draft Neighbourhood Plan on 18 July 2016 where minerals and waste matters were outlined. However these comments do not appear to have been considered as they are not listed within the Consultation Statement.</p> <p>As part of plan making within the county, it should be noted, that minerals and waste matters will need to be taken into account as the county council's Minerals and Waste Local Plans form part of the Development Plan as defined in section 38 of the Planning and Compulsory Planning Act 2004. New development and growth of an area results in the generation of waste and this will be an important aspect needing consideration in due course, in addition to the need to avoid the sterilisation of minerals.</p> <p>The Neighbourhood Plan does not refer to minerals or waste planning. Actions from our previous representation included the need to refer to the following:</p> <ul style="list-style-type: none"> • Waste Core Strategy and Development Management Policies document 2011-2026, adopted November 2012; • Waste Site Allocations document 2011-2026, adopted July 2014; & • Minerals Local Plan 2002-2016, adopted March 2007. <p>With regard to mineral matters, as was previously stated, the Neighbourhood Plan Area is located within the sand and gravel belt, where there is potential for the extraction of sand and gravel. The extent of this Mineral Consultation Area is shown in the county council's adopted Mineral Consultation Areas, Supplementary Planning Document, 2007. This is an area of the county where particular care is needed to prevent the unnecessary sterilisation of sand and gravel resources. In these areas, before planning applications are decided by the district or borough councils, the county council will be given the chance to consider whether the development proposed would lead to unacceptable sterilisation of mineral resources. Minerals Policy 5: Sterilisation, of the adopted Minerals Local Plan 2002-2016 addresses the need for prior extraction of minerals to ensure that the resource is not sterilised.</p> <p style="text-align: right;">In terms of waste Planning Description Decision</p>

		<p>matters, the Neighbourhood Plan area is covered by sites of previous waste development. The Neighbourhood Plan area includes five historic planning applications for waste development in the south eastern part of the Area as follows:</p> <p>Site</p> <table border="0"> <tr> <td data-bbox="557 658 826 725">The Smallholdings (CM580)</td> <td data-bbox="858 658 991 689">8/0322-96</td> <td data-bbox="1023 658 1203 725">Repair/Infilling with waste</td> <td data-bbox="1251 658 1383 759">allowed on appeal 14 May 1997</td> </tr> <tr> <td data-bbox="557 763 783 831">The Smallholdings (CM580)</td> <td data-bbox="858 763 991 795">8/0680-98</td> <td data-bbox="1023 763 1193 864">variation of condition 4 of appeal</td> <td data-bbox="1251 763 1383 864">withdrawn 23 Nov 1999</td> </tr> <tr> <td data-bbox="557 875 740 943">Croxley Centre (CM356)</td> <td data-bbox="858 875 991 907">W/0186-51</td> <td data-bbox="1023 875 1193 1043">Dumping ground for refuse from Croxley Paper Mills</td> <td data-bbox="1251 875 1383 976">permitted 17 Aug 1951</td> </tr> <tr> <td data-bbox="557 1055 740 1122">Croxley Centre (CM356)</td> <td data-bbox="858 1055 991 1086">8/0588-81</td> <td data-bbox="1023 1055 1219 1267">Agricultural land improvement using excavated material (paper mill waste)</td> <td data-bbox="1251 1055 1383 1122">refused 18 Dec 1981</td> </tr> <tr> <td data-bbox="557 1267 740 1335">Croxley Centre (CM356)</td> <td data-bbox="858 1267 991 1299">8/0709-84</td> <td data-bbox="1023 1267 1219 1480">Removal of paper waste and the importation and grading of structural fill</td> <td data-bbox="1251 1267 1383 1368">permitted 28 March 1985</td> </tr> </table>	The Smallholdings (CM580)	8/0322-96	Repair/Infilling with waste	allowed on appeal 14 May 1997	The Smallholdings (CM580)	8/0680-98	variation of condition 4 of appeal	withdrawn 23 Nov 1999	Croxley Centre (CM356)	W/0186-51	Dumping ground for refuse from Croxley Paper Mills	permitted 17 Aug 1951	Croxley Centre (CM356)	8/0588-81	Agricultural land improvement using excavated material (paper mill waste)	refused 18 Dec 1981	Croxley Centre (CM356)	8/0709-84	Removal of paper waste and the importation and grading of structural fill	permitted 28 March 1985
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69	Resident	<p>As a resident of Lewes Way Croxley Green and parent of one prospective pupil of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>I also strongly object to the requirements in Policy PR02 relating to the location of the playing fields, use of the site by the public and the overly prescriptive points about matters such as the conservation of</p>																				

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70	Gladman Developments Ltd	<p>Introduction</p> <p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the first draft version of the Croxley Green Neighbourhood Plan (CGNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>Gladman requests to be added to the Council’s consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.</p> <p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the CGNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p> <p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p> <p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet</p>

		<p>objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 49 of the Framework is clear that <i>'relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'</i>. This applies not only to statutory development plan documents but is also applicable to emerging neighbourhood plans. This has also been confirmed in the High Court.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p>Planning Practice Guidance</p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that</p>
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		<p>where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the RWBNP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.</p> <p>Relationship to Local Plan</p> <p>Adopted Development Plan</p> <p>The current Development Plan relevant to the preparation of the CGNP consists of the Three Rivers Core Strategy (TRCS) which was adopted by Three Rivers District Council (TRDCC) in October 2011. The WCS covers the period from 2011 to 2026 and provides the overarching spatial strategy for the Three Rivers District. Within this plan period the Council are looking to deliver at least 4,500 homes proportionately across settlements within the authority. Accordingly, despite not setting a specific housing target, the CGNP must ensure that it allows for sufficient flexibility to assist WC in meeting its objectively assessed need of affordable and market housing.</p> <p>Croxley Green Neighbourhood Plan</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the CGNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.</p> <p>Policy CA1: New Developments</p> <p>Policy CA1 states that all development will be required to conserve the Character Areas identified in the NDP.</p> <p>Gladman suggest the policy places undue emphasis on controlling the massing and design of new buildings instead of recognising the wider setting of an area. In its current form the policy is overly prescriptive and could result in sustainable development proposals being consider unviable and undeliverable.</p> <p>Policy HO3: Lifetime Neighbourhoods and Security</p> <p>Whilst Gladman support the general thrust of this policy, we submit that the wording should be amended to reflect changing housing and design policies. Therefore we suggest that rather that referencing 'Secured by Design, New Homes 2014', the policy should read 'In particular, all new dwellings should be safe and secure for everyone in line with the latest design principles.'</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has</p>
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		<p>sought to clarify the relation of the CGNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and could be seen to be promoting unsustainable development. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>
71	Resident	<p>I am writing in response to your public consultation about the Croxley Danes School. The Croxley Green Parish Council is clear in its proposed Neighbourhood plan that secondary school places in the area are oversubscribed. Yet it gives scant support to the building and development of the proposed Croxley Danes School. The Neighbourhood plan is supposed to look into the future yet it fails to consider how educational facilities may be adequately provided in coming years.</p> <p>It cannot be reasonable for the school to have so many conditions attached to its development. In particular, it is essential that sports facilities are maintained on-site. The safety of pupils will inevitably be compromised if they are required to walk distances from the school to other locations for these facilities. Neighbours of the school would also suffer the inconvenience of having school children progressing past their premises at all times of day.</p> <p>The requirements of Policy PR02 in the Croxley Green Neighbourhood Plan, which relate to the permanent site of Croxley Danes School, fail to conform with the strategic objectives of the Three Rivers District Council Local Development Plan. Moreover Policy PR02 does not comply with the basic conditions summarised in the National Policy Planning Guidance.</p> <p>The Croxley Green Parish Council Neighbourhood Plan puts the delivery of appropriate educational facilities to local children at risk.</p>
72	Resident	<p>As a resident of Lewes Way Croxley Green and parent of one prospective pupil of Croxley Danes School, I strongly object to the requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School.</p> <p>These requirements add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</p>

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73	Bidwells on behalf of a client	<p>CROXLEY GREEN NEIGHBOURHOOD PLAN 2017 - 2032</p> <p>We act on behalf of a client who has land interests within the Parish of Croxley Green, comprising Killingdown Farm (Policy PR04) and a block of buildings in New Road. No's 166 – 176 comprising a doctors' surgery, computer repairs, funeral directors, 2 cottages and a dilapidated tyre repair workshop.</p> <p>Policy PR04</p> <p>Our client objects to some of the constraints within the policy which are far too prescriptive and restrictive and seek to go far beyond the NPPF.</p> <p>Whilst our client has no issue with achieving good design the 'objective' of a 'model development' should be deleted for reasons we shall explain. The policy wording refers that the development of the site will be subject to a planning brief.</p> <p>A planning brief devised by the Councils with no reference to the landowner. The planning brief would form part of the suite of documents to be considered at the time a planning application was determined. A planning brief, which will take into account the objectives and aims of the NP.</p> <p>A planning brief which the Policy wording of PR04 requires it to reflect the sustainability objectives. We then turn to those sustainability objectives pages 35-39. In these are aims such as 'all new buildings..... should be designed and constructed to the highest standards of energy efficiency and to be carbon neutral'. There should be no reference in Policy PR04 to a planning brief, in particular where it refers to the sustainability objectives of the NP.</p> <p>The Government Policy has removed sustainable codes of construction from planning policy. Instead carbon emissions and thermal efficiency are controlled via Buildings Regulations. The NP through a planning brief which is devised to reflect the sustainability objectives</p>

		<p>of the NP is effectively seeking to place unrealistic and unreasonable demands on this development. Added to the term 'model development' the combination of terms seeks to impose unjustified and disproportionate burdens on this scheme.</p>
74	TFL Properties Transport for London	<p>RE: Consultation on Croxley Green Neighbourhood Plan 2017-2032</p> <p>Thank you for consulting Transport for London (TfL) on the Croxley Green Neighbourhood Plan 2017-2032. The following comments represent the views of officers in Transport for London Commercial Development Property Team (TfL Property) in its capacity as a significant landowner and does not form part of the TfL corporate response. Our colleagues in TfL Planning have provided a separate response regarding TfL wide operational and planning policy matters. The comments within this letter relate directly with our initial response to the Parish Council (dated 9th September 2016), which we also enclose for reference. We appreciate that the Parish Council acknowledged our previous points and included some amendments as recommended, however we would like to reiterate some of these original comments.</p> <p>4. Designation of Character Areas</p> <p>We would support the exclusion of the Baldwin's Lane site from the Rural Character Area of the Neighbourhood Plan, as was previously the case, particularly given that it is already excluded from its former Green Belt designation. The decision to include this site within Area 11 of the latest Neighbourhood Plan is not supported.</p> <p>Whilst we are keen that the land in Baldwin's Lane is approved at the planning application stage for educational purposes, as intended by Hertfordshire County Council, we must reiterate our comments that in the event that the site is not developed for educational uses (either fully or where only part of the site is required for educational purposes), it is considered appropriate that alternative uses for the site, including for housing, are seriously considered. We draw your attention to paragraph 140 of the Planning Inspectorates report on the examination into the Three Rivers District Council Site Allocations Local Development Document which acknowledges the importance of the site allocation but does state that "<i>were events subsequently to demonstrate that the building zone could acceptably be combined with an element of housing at some point in the future, it would be good planning practice to ensure that site design did not rule the possibility out</i>", mindful of any implications for the</p>

		<p>Green Belt. This comment should be acknowledged. We note that the reference to the application of Development Management Policies of Three Rivers District Council has been removed from section 4.2.1 despite our support. We would therefore suggest the re-insertion of this paragraph.</p> <p>6.2 Croxley Station We reiterate our support for the aim of maximising the development potential of this highly accessible site although remain strongly of the view that it is essential that development proposals for the site are financially viable. Whilst we understand the desire to include a community use within this site, we remain unable to support the proposed use as it could severely impact the likelihood of any development coming forward on this site in viability terms. The CIL and S106 financial contributions required to support the development, coupled with a 50% affordable housing target for TfL developments across London already limit the value to be gained from this site whilst still clearly providing several public benefits.</p> <p>We therefore, request that the proposed mix of uses is reconsidered and at the very least included with the terms ‘possible’ or ‘may include’ rather than being set out as a requirement. This has not been set out as an option within the latest draft, as proposed within page 118 of the Consultation Statement.</p> <p>6.3 Other Development Opportunities We re-iterate our support for the objective of this approach, which aims to bring surplus land remaining after the completion of the Metropolitan Line extension into beneficial use.</p>
75	Resident	<p><i>I am writing in response to restrictions placed on the proposed Croxely Danes School site. These restrictions have been raised much too late in the planning process. We have rejected school places at very good local schools and we would not have done so had we known plans had not been finalised. It is not reasonable to chose a school only to have unfair restrictions placed on planning by local residents. Clearly they do not want a secondary school on their doorsteps but where should local children go to school? Secondary schools are already massively over subscribed and the area clearly needs another excellent school.</i></p> <p><i>In my opinion it is not reasonable to expect a school to share grounds with the local community as this would require extra ground staff and it is a threat to school security. Some local schools have a small shared area that the community can use out of school hours and this is a resonable compramise. As far as I know no secondary school</i></p>

		<p><i>shares playing fields with the local community. It</i></p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p><i>Please keep me informed of the Local Planning Authority's decision under regulation 19 of Neighbourhood Planning (General) Regulations 2012 in relation to the Croxley Green Neighbourhood Development Plan.</i></p>
76	Resident	<p>I am appalled at the lack of insight and consultation about this development plan. It is short sighted, discriminatory and poor.</p> <p><i>The requirements of Policy PR02 in the Croxley Green Neighbourhood Development Plan, which relate to the permanent site of Croxley Danes School, add additional constraints to, and thereby do not conform to the strategic objectives of the Three Rivers District Council Local Development Plan. Policy PR02 is therefore not compliant with the basic conditions summarised in the National Policy Planning Guidance.</i></p> <p>I would draw your attention to paragraphs 8, 11 and 12 in our submission which contain the Trust's views and objections to requirements in Policy PR02 relating to the playing fields, use of the site by the public and overly prescriptive points about matters such as the conservation of trees and archaeological surveys.</p> <p>Please throw this plan in the bin as it deserves and give our children a brighter future by proper planning and use of funds. The Croxley Danes school should be supported and every effort should be made to ensure the Danes Trust is satisfied. They are doing work the council should have been doing!!</p>
77	Three Rivers District Council	<p>The Council considers the Croxley Green Neighbourhood Plan to fail to meet the Basic Conditions and supports the recommendations made in the POSe Ltd 'healthcheck'. A number of the issues raised in the POSe Ltd report were resolved in the final submission version of the plan; however there are still several outstanding issues. The Council would also like to raise concerns about overly prescriptive policies relating to allocated sites in our adopted Local Development Plan, with particular concern relating to the Croxley Danes School site.</p>