

## LOCAL PLAN SUB-COMMITTEE - 25 JULY 2022

### PART I – NOT DELEGATED

#### 5. **LOCAL PLAN: Summary of Responses received to Part I of the Local Plan Regulation 18 Preferred Policy Options Consultation (June 2021) (DCES)**

##### 1 **Summary**

This report provides a summary of the Part 1 responses received to the Draft Local Plan Regulation 18 Part 1: Preferred Policy Options consultation. In addition, it proposes changes to two of the preferred policy options contained within the document in response to stakeholders' comments.

##### 2 **Details**

2.1 The Local Plan Regulation 18 document was approved for consultation by Full Council on 25 May 2021. The consultation ran from 11 June – 20 August 2021. The document was in two parts:

- Part One set out the preferred development strategy and preferred policy options for Three Rivers over the next 10-15 years; and
- Part Two included potential sites that could be allocated for residential, employment or other uses in the Local Plan.

2.2 In March 2022, the key policy changes proposed in response to changes to national planning policy, the Environmental Act (November 2021) and representations received to the Regulation 18 consultation were reported to the Local Plan Sub Committee. This report proposes two additional policy changes in response to representations received to the Regulation 18 consultation. Changes to other policies will be the subject of reports to future meetings of the Local Plan Sub Committee.

##### 3 **Summary of Consultation Responses**

3.1 In total, 20,419 comments were received raising a number of points from 351 individuals and organisations.

3.2 31 statutory consultees responded including Hertfordshire County Council, Natural England, Historic England, Environment Agency, Transport for London (TFL), Defence infrastructure Organisation (MOD), NHS Herts Valley CCG, Sport England and Highways England, neighbouring authorities of London Borough Hillingdon, Watford Borough Council, Decorum Borough Council, Buckinghamshire Council, St. Albans District and City Council and Hertsmere Borough Council. Additional statutory consultees included the Home Builders Federation, Utilities and Parish Councils.

3.3 Many of the comments relate to wider issues of planning strategy, however there were also more detailed representations focussing on policy wording and content. Some of the key issues raised include the following:

- The need for restricting new development in the Green Belt;
- The requirement to meet the housing target as set by the Government's standard method calculation;

- The need to reduce the number of homes being planned for;
- Justifying the affordable housing requirement;
- Ensuring that new development does not detract from the character of the District's towns and villages;
- Supporting the delivery of housing to meet the needs of different types of people, especially older people;
- Concerns about the uplift in density of development;
- Response to the climate emergency and the need to include biodiversity net gain;
- The need to adopt an infrastructure first approach.

3.4 The above list in no way covers all of the issues raised and suggested changes. Appendix 3 provides a summary table of the issues raised by non-statutory consultees. Appendix 4 provides a summary table of statutory consultees responses and Appendix 5 provides the statutory consultee comments in full.

3.5 The consultation responses to the Regulation 18 Part 2 Sites for Potential Allocation will be reported to a future Local Plan Sub Committee.

#### **4 Policy changes**

4.1 Two policy changes are recommended. The recommended policy changes are as follows:

- Appendix 1: Preferred Policy Option 1 Strategic Policy: Overarching Policy on Sustainable Development
- Appendix 2: Preferred Policy Option 10 Social and Community Uses

4.2 These changes are based on the suggestions from statutory consultees such as Sport England, the Environment Agency and NHS Herts CCG to ensure robust and effective policies. Within Preferred Policy Option 1, the Environment Agency have recommended including reference to Biodiversity Net Gain in line with paragraph 179 of the NPPF. Reference to 'flood risk' has been suggested within the list of infrastructure to achieve sustainable development in line with paragraph 160 of the NPPF. Likewise, Sport England have suggested additional text to encourage active lifestyles to the list of purposes of promoting buildings and public spaces of a high enduring design quality as the design of buildings/spaces can directly encourage people to be physically active.

4.3 Additional criteria have been suggested to strengthen Preferred Policy Option 10 with regards to the need for identifying strategic or local need for the new/improved social or community facility. Likewise, additional text is suggested by NHS Herts CCG to support NHS Service modernisation strategy where the loss or change of use of facilities arises. Overall, these changes are relatively minor and help to strengthen the policies.

#### **5 Policy/Budget Reference and Implications**

5.1 The recommendations in this report are within the Council's agreed policy and budgets.

**6 Financial, Legal, Equal Opportunities, Staffing, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications**

6.1 None specific.

**7 Recommendation**

That the Local Plan Sub Committee note the contents of this report, and recommend to the Policy & Resources Committee:

- Policy changes specifically relating to Preferred Policy Option 1 Strategic Policy: Overarching policy on sustainable development and Preferred Policy Option 10 Social and community Uses (in Appendix 1 and 2)

**Background Papers**

National Planning Policy Framework (2021)

Planning Practice Guidance

Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Regulation 18 Part 1: Preferred Policy Options

<https://www.threerivers.gov.uk/download?id=50024>

**APPENDICES**

Appendix 1 Preferred Policy Option 1 Strategic Policy: Overarching policy on sustainable development

Appendix 2 Preferred Policy Option 10 Social and community Uses

Appendix 3 Summary of Non-statutory responses

Appendix 4 Summary of Statutory responses

Appendix 5 All Statutory Responses