

## Appendix 4 Summary of Statutory Responses

<b>General Comments/other comments</b>
<ul style="list-style-type: none"><li>• Safeguarding of land for Part 2 Allocations to align with the proposed Metropolitan Line Extension (MLX) project formerly known as the Croxley Rail Link</li><li>• Adjoining authorities not in a position to assist with accommodating unmet housing need in TRDC</li><li>• Need to address how to manage housing shortfall</li><li>• Existing water network capacity and future upgrading to be considered in site allocations</li><li>• Rural exception sites to be retained</li><li>• Need for a separate policy on MOD establishment at Northwood, remove it from CIL charging area and any Neighbourhood plans</li><li>• Need to restrict development in the Green Belt</li><li>• Need to use 2018 ONS data in calculating housing need</li><li>• Significant levels of development have taken place between Kings Langley station and Lower Road (KL Parish Council)</li><li>• Comments on sites (to be reported to a later Local Plan Sub Committee)</li><li>• Questioning the need for a high proportion (25%) of growth in South West part of the District</li><li>• Raising noise and air quality issues</li><li>• Questioning the relationship between local incomes and the local cost of local housing (CGPC)</li><li>• Housing figures are too high</li><li>• Need for extra care homes, libraries and educational establishments if housing numbers go up</li><li>• Need for natural habitat to be robustly linked together through habitat corridors</li><li>• Support Hertfordshire Climate Change and Sustainability Partnership initiatives</li><li>• Support proposed vision and growth objectives</li><li>• Need to address cross-boundary issues of infrastructure</li></ul>
<b>Presumption in favour of sustainable development</b>
<ul style="list-style-type: none"><li>• Additional wording to be added to Strategic Objective 11</li><li>• Additional wording to be added to Policy Option 1, part 3 (n)</li><li>• Changes in a number of strategic objectives to reflect the current priorities</li><li>• Suggest introducing specific targets on the range of priorities such as biodiversity</li><li>• Introduce criteria for density</li><li>• All new construction is required to be sustainable as a starting point</li><li>• Need the policy to be more ambitious</li></ul>
<b>Housing Mix and Type</b>
<ul style="list-style-type: none"><li>• Need to set out a specific policy option to support delivery of housing development to meet specific needs for older people.</li><li>• Request that where the housing mix for a local area such as a village or parish is different to that TRDC as a whole that targets be suitably adjusted for those areas to achieve the desired needs for that community</li><li>• Need to be clear on self-build housing requirements</li><li>• Concerns that the balance of housing may not adequately reflect the changing needs of the community following Brexit and the pandemic</li><li>• Need to set site-based strategy for housing mix</li><li>• Need to clearly define which type of specialist and supported accommodation are supported as part of this policies</li><li>• Policy should be flexible to not to include specialist and supported housing where it can be justified on major sites and questions what are 'strategic' sites</li></ul>
<b>Housing Density approach and assumptions</b>

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<ul style="list-style-type: none"><li>• Housing density should reflect the density of the existing settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area</li><li>• Need for the density issue to consider viability of sites, especially given the affordable housing requirement</li><li>• Need to reconsider density assumptions capturing local factors, need for appropriate outdoor spaces</li></ul>
<b>Affordable Housing</b>
<ul style="list-style-type: none"><li>• Need to revisit requirement for all development to provide an affordable housing contribution based on historic delivery; introduce First Homes policy; and factor in Viability</li><li>• Need to take 60% affordable housing requirement as stated in the LHNA</li><li>• Define Affordable Housing</li></ul>
<b>Gypsies, Travellers and Travelling Showpeople</b>
<ul style="list-style-type: none"><li>• Minor amendment suggested to Criterion 1 (a) to reflect 'all sources of flooding'</li><li>• Reference to outlooks over the railway line be removed.</li></ul>
<b>Residential Design and Layout and Accessible and Adaptable Buildings</b>
<ul style="list-style-type: none"><li>• Provide evidence to Nationally Described Space standards/accessibility standards; unsold self-build homes should come back to the market</li><li>• Respect existing characters</li><li>• Need for the policy to be altered to make sure it is aligned with the National Design Guide and that it follows the principles in design coding and masterplanning</li><li>• Need for new buildings to be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards</li></ul>
<b>Employment and Economic Development</b>
<ul style="list-style-type: none"><li>• Need to treat the South West Herts Economic Study with caution due to COVID and relaxation of planning controls across SWH as a whole</li><li>• Shift from traditional office based work and want to consider creation of community based hubs</li><li>• SADC maybe in a position to support South West Herts Authorities in meeting the collective shortfall in employment land based on the current South West Herts Economic Study Update (2019)</li><li>• Need to strengthen paragraph 5 through the consideration of the 'Agent of Change' principle (NPPF, paragraph 182)</li><li>• A new policy to encourage and support businesses carrying out maintenance, repair and refurbishment locally, to support the circular economy</li></ul>
<b>Retail and Leisure</b>
<ul style="list-style-type: none"><li>• Want a set standard for each centre to assess its failings and address them. Simply identifying an area does not do this</li></ul>
<b>Social and community facilities</b>
<ul style="list-style-type: none"><li>• Additional wording needed for clarity</li><li>• Social and community facilities should be run as locally as possible, i.e. by Parish Councils, local associations or community groups wherever possible; need for policy to support retaining the Red Cross Centre in Croxley Green as a community asset and community building, and we consider that the policy should be extended</li></ul>
<b>Health and Wellbeing</b>

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<ul style="list-style-type: none"><li>• Change threshold for HIA requirement</li><li>• Need for the policy to beyond being reactive</li><li>• Stronger reference to health inequalities</li><li>• Adopt RIBA Social Value toolkit</li><li>• Provision of S106 &amp; CIL contributions towards improvement of towpath and access points along Grand Union canal</li></ul>
<b>Carbon Dioxide Emissions and On-site Renewable Energy</b>
<ul style="list-style-type: none"><li>• Draft policy to be amended to ensure 20% reduction to Part L 2013 will be required until such a time building regulations are implemented</li><li>• Higher standard needs to be set</li></ul>
<b>Climate Change and Sustainable Construction</b>
<ul style="list-style-type: none"><li>• BREEAM standards should to be applied to all developments</li><li>• All development to be subject to sustainability statement</li><li>• Introduce mechanism for enforceability</li><li>• Need to rewrite the policy for clarity requiring the developer to do the necessary assessments and show how risks are tackled through a series of levels: Adapting to climate change, Sustainable Design and Construction, Sustainability Statement</li></ul>
<b>Renewable and Low Carbon Energy Developments</b>
<ul style="list-style-type: none"><li>• Request that developments of 4 units and above must consider shared energy options</li><li>• Need to introduce more specific and detailed targets, and become part of a fully sustainable strategy for any new residential or commercial developments (CGPC)</li><li>• Need for all new housing has its own heat and power generation on site. If we can make all new housing as 'off grid' as possible, then we would be moving in the right direction</li><li>• Need to identify suitable locations for renewable energy generation and propose these in the local plan</li><li>• Need to identify a more positive approach that could be set out for renewable energy development in the Green Belt</li></ul>
<b>Flood Risk and Water Resources</b>
<ul style="list-style-type: none"><li>• Strengthen the policy by additional text to encourage developers to engage Thames Water to discuss their wastewater requirements at an early stage, prior to planning applications, include new policy to support anticipated upgrade to Maple Lodge Waste Water Treatment Site.</li><li>• Site specific flood risk assessment to be required</li><li>• No residential development in Flood Zone 2 and 3</li><li>• Policy is unenforceable</li><li>• Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures</li><li>• Development must not lead to any surface water flooding or SRN carriageway.</li></ul>
<b>Green Belt</b>
<ul style="list-style-type: none"><li>• Concerns around the overdevelopment of Green Belt and threat to various parts of the Green Belt</li><li>• TRDC should not change the designation of any land within the Green Belt, except in extreme cases or where slight amendment of the boundaries is locally acceptable and does not damage the integrity of the Green Belt.</li><li>• Prohibit converting existing buildings in Green Belt to residential use with a legally enforceable covenant as well as conditions attached to any planning permission.</li></ul>

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<ul style="list-style-type: none"><li>• Waterdale site to be excluded from Green Belt</li><li>• Tranquillity of the Green Belt should be maintained by applying appropriate noise, air quality and lighting mitigation measures</li></ul>
<b>Ground Conditions, Contamination and Pollution</b>
<ul style="list-style-type: none"><li>• Lacks guidance to mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts</li></ul>
<b>Waste Management and Recycling</b>
<ul style="list-style-type: none"><li>• Strengthen the policy by providing clarity on modern methods of construction, additional details and a degree of flexibility to allow some degree of adverse impact(s) where these can be reasonably mitigated</li></ul>
<b>Green and Blue Infrastructure Network</b>
<ul style="list-style-type: none"><li>• Strengthen the policy by adding specific reference to the importance of retaining and improving smaller scale local features, evidence to underpin the strategic planning and delivery of GI within the district and its wider context, in line with NPPF paragraph 25, and amending the definition of GI</li><li>• There is no reference to a district level GI strategy within the policy or listed within the local plan evidence base</li><li>• Include requirement for a survey to identify important habitats including floating habitats</li></ul>
<b>Landscape Character</b>
<ul style="list-style-type: none"><li>• Policy should be expanded to refer to the role historic environment has to play in understanding the landscape</li><li>• Strengthen the policy by taking account of Environment Bill, referencing Herts Green and Blue Infrastructure Strategy and National Design Guide, making distinction between the strategic GI network and local open spaces and importance of topography.</li></ul>
<b>Biodiversity, Trees, Woodlands and Landscaping</b>
<ul style="list-style-type: none"><li>• Development of Greenfield sites will have adverse effects on biodiversity Provides additional information for development near national grid assets (power lines and gas assets which relate to planning applications</li><li>• The suggestion that “the need for the development would outweigh the need to safeguard the site” is vague and easily open to abuse.</li><li>• provision of alternative sites should require a full EIA. Achievement of the biodiversity gain from alternative local sites when it cannot be achieved at the site of the development is not acceptable</li><li>• Policy should be ambitious and more detail should be provided through maps/coordinates etc.</li><li>• Any replacement trees should be native</li><li>• Chilterns Area of Outstanding Natural Beauty (AONB) may be better placed in a policy focused on ‘landscape value’ in line with NPPF paragraph 174</li><li>• Potential for the policy to be expanded to townscape character</li><li>• Some of the documents referred to have been updated</li><li>• Developers should be required to set out how they comply with the policy</li><li>• Clarity needed in identifying ‘landscape regions’</li></ul>
<b>Open Space, Play Space and Recreation</b>

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<ul style="list-style-type: none"><li>• Additional wording to provide clarity on applicant's responsibility to demonstrate new development do not cause adverse effects to existing deficiency, to provide reference to indoor and outdoor sports facilities, multifunctional spaces</li><li>• CIL required from small development</li><li>• Various amendments suggested to ensure retention of important features, sufficient space for large trees in line with the revised NPPF on the matters of Trees and BNG</li><li>• Include reference to ANGST standard</li></ul>
<b>Local Distinctiveness and Place Shaping</b>
<ul style="list-style-type: none"><li>• Policy should be expanded to specifically refer to the historic environment, principles of healthier/active communities through design and Sport England's Active design Guidance</li><li>• Policy should be extended to extensions and adaptations</li><li>• Provide Design Guides</li><li>• Lacks Character document to support the policy</li></ul>
<b>Advertisements</b>
<ul style="list-style-type: none"><li>• Needs reference to Design Guidance, advertisements and the SRN</li></ul>
<b>Heritage and the Historic Environment</b>
<ul style="list-style-type: none"><li>• Amendment suggested to remain consistent with the Framework.</li><li>• Requests that the Council has a local list with criteria</li><li>• The policy should set out a clear distinction between Registered and unregistered parks and gardens, greater clarity is also needed in relation to non-designated archaeology.</li><li>• the policy also omits the key tests in paragraph 193 and 194 of the NPPF in relation harm of loss of significance.</li><li>• Strengthen the policy overall as there is little about what makes Three Rivers special</li><li>• The expected scope and content of Heritage Impact Assessments which the Local Plan proposes to be submitted with development proposals should be clarified</li><li>• Does not safeguard heritage and the historic environment for the Grand Union Canal</li></ul>
<b>Sustainable Transport and Travel</b>
<ul style="list-style-type: none"><li>• Policy could be strengthened by making references to promoting healthier/active communities through design, principles that developments should incorporate into the design of development to encourage active lifestyles such as connected walking and cycle routes, co-located community facilities, multi-functional open space and active buildings including references to Transport Hierarchy and Place and Movement Design Guide</li><li>• Concerns around large developments generating extra traffic on the roads</li><li>• Various rewordings suggested to align closely with HCC Transport policies</li><li>• Potential long-term options be recognised as part of a long-term sustainable transport strategy and this be reflected in policy</li></ul>
<b>Parking</b>
<ul style="list-style-type: none"><li>• Lacks clarity on when parking standards will be revised to enable appropriate referencing</li><li>• Unclear whether "development" in policy 28(1) includes extensions and adaptations</li><li>• Specific parking requirements for car clubs and rented vehicles should be provided</li></ul>
<b>Deliveries, Servicing and Construction</b>

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<ul style="list-style-type: none"><li>References to Highways England and SRN and requirements for Construction Management Plans should be added</li></ul>
<b>Waterways</b>
<ul style="list-style-type: none"><li>Additional protection from unauthorised discharges to be included</li><li>Bring clarity on if the policy includes canals and introduce a separate policy for the Grand Union Canal</li></ul>
<b>Broadband and Electronic Communications</b>
<ul style="list-style-type: none"><li>Minor policy wording suggested to strengthen the policy</li></ul>