

## APPENDIX 3: SUMMARY OF NON-STATUTORY RESPONSES

### GENERAL COMMENTS

- Text is occasionally confusing and repetitive;
- Certain chapters lack focus and include material which is misleading or irrelevant
- Impact on designated protected areas not sufficiently addressed
- Lack of protection of Green Belt and Chilterns Area of Outstanding Natural Beauty (AONB)
- Overprovision of housing and out-of-date projections
- Failure to address climate change
- Inadequate provisions for water supply and wastewater disposal
- Loss of biodiversity inadequately addressed
- Underestimation of the opportunities for regeneration and reuse of land

#### Accessibility of the Plan

- Way the plan is presented is inaccessible, as requires residents to plough through many supplementary documents to gain information that is required to understand what is being proposed
- Should summarise for residents in a couple of paragraphs the key points from the evidence base
- Burying all the fine detail across many documents is discriminatory, as only the most diligent, document hungry and 'time available' residents will grasp and comment on what's being proposed.

#### Strategic Considerations

- No vision for sustainable development
- Local Plan seems to be a collection of ad hoc responses to the various development pressures on the district rather than a strategic vision

#### Environmental Considerations

- UN recent IPCC report on climate change has made the issue even more important
- Total lack of objective targets

#### Housing Market

- Not clear from the consultation document what the methodology for new figure
- Council has failed to take account of local planning authorities' ability to challenge the Government's calculation for housing numbers

### Standard Method

- The Standard method is out of date due to Brexit, growth levels are unrealistic and level of housing proposed will destroy character.
- Not enough schools, medical facilities and infrastructure to sustain high levels of growth, local targets should be set
- Balance between affordable homes and local character needed
- Does not explain that the Council will not comply with standard methodology
- Need to ensure needs are met, no exceptional circumstances have been put forward for not meeting standards. A reluctance to release Green Belt in Sustainable Locations does not compromise exceptional circumstances.
- Cannot meet ecological or environmental requirements with government's figures.
- Number of documents supporting the policies and approach are out of date
- Only between 4,800 and 5,400 new homes by plan period are required. Council not provided evidence as to how figure was calculated. Brownfield sites should be maximised;
- Disagree with inclusion of Warner Bros studios in list of potential development in Para 2.48

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- Carpenders Park would develop industrial land. Area prone to flooding. More pressure on infrastructure.
- Need a redistribution of population away from South East, spread over the country.

### **Sustainable Development**

- Sustainable Development through the use of Brownfield land and reducing waste. Ensure infrastructure is in place and do not destroy existing recreational facilities; more social housing and using sustainable materials and location of building outside flood zones
- Need to consider environmental impacts. Green Belt land should not be used for anymore development.
- Tackling climate change should be a priority
- High density development will have a negative impact on the environment and not sustainable development
- Questions are too narrow for a response. Strategic Objectives should be revised to encompass key principles as Strategic Objectives have omitted resilience in built environment and the communities. Objectives could be re-ordered into three distinct groups – environmental, economic, and social –
- Not sufficient enough to ‘aim’ to reduce further impacts on environment
- Infrastructure first approach needs to be properly reflected in this policy. For some of the sites allocated, analysis of sites shows that infrastructure cannot support the additional development and needs to be considered
- No mention of climate change in the vision considering the Council has announced a climate emergency;
- Preferred Policy does not go far enough. Plan considers development in isolation, does not take account of plans in neighbouring authorities.
- Reduce the need to travel by locating development in sustainable/ accessible locations
- De-designate conservation areas and use employment areas
- No specific mention in the objectives of the Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB), the Colne Valley Regional Park, or the countryside. Suggested that an additional objective could be inserted, as follows: *“To protect and enhance the Green Belt and rural areas and support farming, rural businesses, and countryside recreation.”*
- River Chess is a globally significant and rare chalk stream, threatened by over extraction of water
- Sewage works at Maple Cross and unfit for purpose for decades. S10 will not add to problem but will also not address existing
- Density targets are excessive and does not limit development heights

### **Housing Mix and Type**

- Will result in small houses that no one can afford
- Enhance Design Guide and restrict buildings to four storeys
- Mix lower value housing with more expensive ones. Provide an overall mix of housing types across the whole district, proportion of 3 and 4 bedroom should be area of greatest scrutiny as is where environmental impact is greatest but also more hard standing which will impact flood risk.
- Permitted development rights should be curtailed to prevent bungalows being extended upwards;
- Use Class 2 accommodation may be a suitable requirement to alleviate issues of ‘blockage’ of larger standard housing by an aging population.
- Data based on out of date projections, should be based on 2018 projections
- Paragraph 3 of Policy Option 2 - Reference to housing proposals of 100 dwellings or more. Here, the Associations suggest that the requirement should be changed to a “masterplan”, rather than a “strategy.”
- Ageing population seem to have been ignored by the plan

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- Any large sites (10+ units) should be developed with a masterplan, particularly in Croxley Green. Balance of housing does not reflect Brexit or Pandemic, needs to be more carefully monitored.
- Self-build will have an adverse effect on the local character
- Does not acknowledge real need of housing and starter homes should be income-related, more detailed assessment needed
- Make local planning rules more flexible to allow additional living space to be added to existing dwellings.
- No alternatives suggested
- Need additional clarification on what will occur if housing mix is different in a village to the rest of Three Rivers

### **Housing Density**

- Density threshold should be lowered to reflect current situation post pandemic and retain local character. Show or specify what a 50dph scheme is
- Enhance the design guide and limit to four stories
- Number of homes proposed in Maple Cross and West huye is disproportionate to all other areas of Three Rivers (1,500 dwellings)
- High density puts pressure on local infrastructure
- High density makes sense to preserve Green Belt
- Rickmansworth is not a good example with flats above shops and no private amenity space
- Council should incentivise people to grow their own food which helps sustainability and cost of living
- Specific densities should be set with no exceptions, regardless of commercial limits of site in question

### **Affordable Housing**

- More affordable homes needed at right price. 80% of market value is not affordable
- Need to define what 'affordable is'
- Need more flexibility with regards to housing options. Council in supporting text does not acknowledge the real need, demands and needs for social housing
- Smaller sites less than 10 dwellings will have a crucial role in delivery of affordable housing;
- 50% affordable in developments with 10 or more dwellings will lead to a distortion of housing concentrated on a few new sites which will lead to unmixed and social issues
- Criteria for "exceptional cases" and lowering affordable housing contribution needs further explanation
- Lower % of affordable housing. Needs to be 35% affordable units to be affordable. Of the affordable no of units, 35% for social rent, 45% affordable rent and 20% for shared ownership, Social rent only have a 40% market value and developer would make no profit, why there should be a limit to 35%
- No alternatives suggested
- 80% social rent/ 20% affordable split is not viable

### **Gypsies and Travellers sites**

- Should be located outside the residential areas
- Green Belt land should be considered for this purpose
- Consider impacts on environment and infrastructure and wider climate and biodiversity policies
- No special provision for travellers and treated the same with regards to planning applications
- Consider alternative options

### **Residential Design and Layout**

- Completely inadequate, enhance and include a restriction buildings four stories and 45 degree rule applied to both front and rear of buildings

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- Do not address environmental possibilities of new housing developments.
- Agreement with approach as long as extra dwellings not added into small gardens and amenity space standards are adhered to.
- Para 4.72 needs to be strengthened in respect of back land development as intention is unclear
- No criteria have been given to indicate what overdevelopment is
- Minimum amenity space standards will lead to very cramped conditions, should be the absolute minimum;
- Higher percentage of new buildings with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards needed
- No viability study to justify internal and external space standards;

### **Employment and Economic Development**

- Protect offices and businesses from redevelopment into residential
- Need more emphasis on employment opportunities over warehouse and storage, as latter will lead to overproduction of replacement goods
- Increasing levels of industrial and storage will increase noise pollution and traffic
- Do not allow expansion of Croxley Park and Leavesden Studio to protect Green Belt
- Agreement with approach especially 12months as benchmark for vacant properties
- Employment land need figures need to be reconsidered due to increased working from home
- Assumptions limited due to lack of assessment of Covid 19 impact, characteristics of the local workforce, empty offices and automation
- Further employment land would be needed to support the housing growth west and south of Maple Cross
- Minimum number of employees per hectare should be considered as warehouse developments.
- Strengthen retail and service sectors on the high street for employment growth

### **Warner Brothers Studio**

- Policy is too focused on Warner Bros and not subsidiary businesses. Inappropriate and presumptive to allocate land for individual commercial operations
- Expansion will likely lead to increased traffic
- Expansion into Green Belt should be prohibited. Further evidence is required that this developed meets the 'Exceptional Circumstances set out in this policy.
- Need further information on what is an 'associated use'
- Would conflict with national policy on protecting Green Belt and Councils Preferred Policy Option 16;

### **Retail and Leisure**

- Too much retail and leisure facilities are proposed
- Not made defined objectives for leisure facilities
- Conversion of un-used retail space in appropriate locations should be viewed positively
- Subsidise empty shops for start-up businesses
- Prevent car park loss

### **Social and community facilities**

- Retain existing social/ community facilities on same site if to be redeveloped
- Policy does not discern between social and community facilities which are essential, therefore loss would be harmful;
- Policy should not seek to protect social or community facilities unless they are **essential** in meeting economic and social welfare of the District
- Rickmansworth Centre is not given enough prominence. Library is vital and needs renovation and new resourcing and deserves central location.
- All new developments should include Health Impact Assessments, not just above a certain threshold

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- Impact of noise pollution needs to be acknowledged and addressed, in particular traffic
- Would be good to include a preference for facilities (e.g playgrounds) which incorporate biodiversity enhancing features.

### **Health and Wellbeing**

- Building on green space is not an incentive to improve health/wellbeing
- Cutting social budgets does not improve wellbeing
- No mandate to increase provision of healthcare facilities
- Provide sufficient places for communities health through sports, leisure and community activity spaces
- Concerns around air quality and noise on sites near M25
- Green Belt remains critical to support health and wellbeing. Do not build on Green Belt
- Object to restricting Health Assessments to 100 dwellings/ new development curtilage as it does not address deficiencies or accumulating incremental impact of other developments
- Reconsider HI Assessment threshold

### **Carbon Dioxide Emissions and On-site Renewable Energy**

- Policy is not far reaching to have sufficient emphasis renewable energy of different types including those which are more easily accessible, such as Solar Panels
- Have shared energy and heating sources for all developments
- Include a clause that 20% reduction be increased in line with national policy. Target is not ambitious enough. By 2038 should be aiming for net zero, not 80% target reduction
- No account of environment impact from demolition of existing buildings.
- Consider provision for electric vehicle charging at private/ public properties
- Questions whether the need for enhanced energy efficiency measures is a necessary requirement of Local Plan policy given Government's forthcoming changes to Part F and L of the Building Regulations.

### **Adapting to Climate Change and Sustainable Construction**

- Aspects such as implications of climate change, overheating, wider impact of weather events, improvement in construction of buildings are not considered.
- Policy does not go far enough and no infrastructure for electric cars
- Question reason to limit application of BREEAM standard to major non-residential development and why to include a very broad escape clause unless this is demonstrated to be unviable. Should cover all developments
- All development should be required to submit a Sustainability Assessment
- All developments should be subject to this policy, including extensions and alterations
- A policy should be included encouraging sensitive retrofitting of renewable energy to historic buildings whilst safeguarding the special characteristics of the buildings
- Council should be designating sites for renewable energy projects in the Local Plan

### **Renewable and Low Carbon Energy Developments**

- Do not support wind turbines/ solar cells being deployed without being integrated into a development, not integrated not optimisation of land
- Policy needs to be strengthened, need more than encouraging developers. More interrogation/ explanation are needed as to what renewable energy is required, Council should designate sites for renewable energy projects.

### **Flood Risk**

- Why is development still taking place on the floodplain? Areas in Oxley Lane proposed to be developed are in Flood Risk Areas
- Developing Green Belt Land will increase flood risk
- Need statements on existing infrastructure ability to cope with existing water drainage and sewage. Rickmansworth has as a public record the inadequacy of the drainage system and future development needs to take this into consideration.

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- Plan should set out what to do to mitigate against possible flooding. It does not take account of climate change and is not relevant if only based on historic flood risk calculations
- Strengthen the policy with reference to biodiversity, water saving measures, natural forms of landforms and green spaces as flood defence
- Chalk streams such as Rivers Colne, Gade and Chess as surface water resources should be protected
- Development in Flood Zone 3 and 2 should be resisted
- Sustainable Drainage Systems do not work where flooding is already a risk
- Ensure new properties achieve a BREEAM Excellent rating for water efficiency
- Emphasise maximum area of impermeable hardstanding for a front driveway and encouragement of more gardens

### **Green Belt**

- Plan should not allow new development in Green Belt. Need a stronger policy to protect Green Belt
- Delete “other than those specified in national policy except in very special circumstances” from Item 5 as national policy is based on outdated projections
- Implement Brownfield first approach and object to re-drawing Green Belt land to accommodate inflated housing numbers
- Add reference to limitation on buildings associated with appropriate Green Belt uses such as recreation and leisure.
- Proposed 300+ homes near Woodside road would mean irreversible loss of valuable countryside and green space
- Allocated Green Belt sites should be listed in this policy;
- Premature to release land from Green Belt due to potential change in housing numbers
- There is no reference to loss of agricultural land or viability issues
- 5m limit should be altered to within the site, many existing buildings within green belt are located in sites more than 5m from the boundary

### **Ground Conditions, Contamination and Pollution**

- Should be phrased in a positive way in that is an opportunity to remove the contamination rather than hoping the existing problem goes away
- Maintain Green Belt near motorways will assist addressing air pollution. Balance between extra housing and woodland/ environment and local environment is essential
- Increasing population and reduction of green space will inevitably increase pollution, can only mitigate with minimum development at low density
- Most efficient energy use lighting should be encouraged. Policy could be enhanced by specific references to noise and air pollution  
New criterion (9) should be added for the effective protection of Chilterns AONB or its setting.

### **Waste Management and Recycling**

- Increase in housing will put pressure on waste management
- a requirement for commercial development to phase out single use materials and provide recycling facilities
- Policy is not ambitious enough and Three Rivers should be leading the way on recycling
- Approach is not suitable for high density homes and people with disabilities

### **Green and Blue Infrastructure Network**

- Should reference back and front gardens, street verges roundabouts, central reservations etc as part of green infrastructure.
- Policy needs to be strengthened to strengthen woodland and wildlife habitats from development. Concerns that wider countryside, including protected landscapes, not specified as Green Infrastructure in para 10.0. Areas such as Philipshill Wood, Carpenters Wood, Bottom Hill Wood and surrounding fields should be added

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- Change policy to 6) Development will not compromise the integrity of the Green Infrastructure network, by causing fragmentation, damage to, or isolation of Green Infrastructure assets including natural habitats and species. All watercourses and priority habitats must be buffered by a minimum of 10m of complimentary habitat to ensure their continued ecological functionality.
- There should be a District-wide spatial strategy for green and blue infrastructure enhancement, such as that being carried out by other LPAs (for example, Lancaster City Council)
- Commit to nature recovery as well as making reference to delivering Biodiversity Net Gain through new development. Increase BNG
- Needs to be a net gain of 10% biodiversity for all new developments, as will be made mandatory by national government as part of Environment Bill
- Swift Bricks or Boxes should be built in all new developments
- Recommend a requirement for Landscape Visual Impact Assessments (LVIA) is undertaken for developments within protected landscape/ its setting
- It is critical that the corridors are sufficiently short and wide to enable wildlife to pass through them with confidence. Buffer Zone of 30m/ 40m required
- The key assets listed in Part 2 should include agricultural land and soils

### **Landscape Character**

- Do not develop Green Belt Land to protect landscape character
- Place greater emphasis on exclusion of developments which are out of character with the local area due to height, density or bulk
- Site-by-site assessment should also include cumulative effects, as required in para 1d of PPO20
- Need to consider adding a policy to Colne Park;
- Should make reference to HCC's Landscape Character Assessment
- Policy and supporting text makes reference to the 'Landscape Regions' defined in the Hertfordshire County Council landscape assessment. Explain how these three regions relate to the three National Character Areas (Chilterns, Northern Thames Basin and Thames Valley).

### **Biodiversity, Trees, Woodlands and Landscaping**

- Agree with approach but that developments enhance habitats with improved landscaping
- Statements are too vague and do not offer protection for wildlife and ecology
- All developments should have swift boxes particularly areas favoured by swifts
- Paras 3b and 3c need to be much more specific as to the exact meaning of 'local biodiversity';
- A spatial strategy indicating locations in Three Rivers where biodiversity net gain can be located is essential
- Local Plan should include policies and criteria to prevent development in the areas under consideration that would normally be resisted if the site was already in the AONB
- On-site mitigation should be promoted
- Specify a minimum 30 year obligation on the developer to maintain biodiversity net-gain sites
- Policy wordings provide leverage to developers and bypass biodiversity requirements
- Compliance with Environment Bill and introduce 10% target
- Potential development impact on all species which inhabit or use a site for resources should be comprehensively and independently evaluated
- Main concern about Policy Option 21 is that it does not appear to make any strong commitment to ensuring that a significant number of new trees are planted as part of new development, and in particular housing.

### **Open Space, Play Space and Recreation**

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- Need to allocate sports facilities, in particular in areas of greatest need (such as Croxley Green FC which do not have their own sports club grounds)
- Need major development with open space to submit an open space design and management plan
- Important that open space is allocated for local food production and helps communities become resilient to climate change
- Importance of two major pathways, the Hertfordshire Way and the Chiltern Way, should be recognised and subject of policy to protect and enhance their contributions to health and wellbeing
- Amenity spaces in all housing types should be considered
- Encourage use of existing outdoor space, don't build indoor spaces

### **Local Distinctiveness and Place Shaping**

- Policy based on 'respecting local distinctiveness' is reactive but not ambitious
- Consider what makes a place distinctive. Expanding villages affects community cohesion
- Agree with approach but 'take account of surrounding area' is not strong enough nor specific enough to prevent overdevelopment
- Need to prevent coalescence between villages and protect open space between settlements
- Plan should reference National Model Design Code
- Extension and adaptation projects individually and cumulatively and Chilterns Building Design Guide detract from the character and stronger policies required to address them
- Reassess the impact of density, height and bulk of the buildings on the local character

### **Advertisement**

- No Hoarding should be allowed. Unclear how adverts will contribute to a safe and attractive environment
- Might be useful to include a reference to community acceptability e.g. living next to a sign advertising a strip club
- Make provision for the local people should decide impact on their view and area

### **Heritage and Historic Environment**

- Any enhancements to listed building should consider environmental impacts
- Current Local Plan contains a policy on Conservation Areas (DM3©). However, policy has been omitted in this Local Plan. Need to carry forward this policy for the Local Plan
- Policy option 25 overly focussed on the impact of development within a Conservation Area and fails to give sufficient weight to protecting against development outside but near to a Conservation Area.
- Omission of setting of a Conservation Area needs to be reinserted
- Strengthen the policy through stronger wordings
- Current Local Plan gives clear guidance on demolition, but not in this Local Plan
- Reintroduce policy from current local plan into new local plan policy to refuse permission for developments that adversely affect the setting, character, appearance of or views in to or out of that Conservation Area.

### **Sustainable Transport and Travel**

- Policy is unrealistic due to high car ownership. Local Plan should be more aspirational and acknowledge and reverse patterns of increasing car dependency
- Traffic levels and infrastructure pressures will increase with the proposed new housing
- Unrealistic to claim objectives will be met without addressing as part of any housing plans and demonstrating what can be done as part of the housing plan
- Embrace 15-minute neighbourhood, majority of daily trips are possible by sustainable modes, minimising the impacts of motor vehicles
- Policy is not strong enough in light of the climate emergency



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- For large-scale developments, Council must follow NPPF 2021, para 104 and ensure Transport Assessments are produced
- Policy should provide clarity as to what constitutes safe access for pedestrians, safe routes should be a requirement to link developments of 10 dwellings or more to facilities and services
- Need greater provision of electric charging points
- Noise and air pollution arising from main and major roads needs to be addressed
- Reassess traffic impacts on the current road network before proposing new housing
- Existing road provision already produces regular gridlock and large-scale developments here and in adjoining Local Authorities will further exacerbate the problem.

### **Parking**

- Requirement for providing electric vehicle charging points should be worded in a stronger way
- Paved driveways have led to more flooding, which needs to be addressed by the Plan
- Ideas include zones where car ownership is not permitted, shared parking away from residences, or Low Traffic Neighbourhoods.
- Parking requirement for different land uses and different house types. Parking space dimensions should be reconsidered
- The cycle parking requirements in Appendix 3 for older persons' housing would constitute overprovision
- No Local Plan Viability Assessment has been published with the Regulation 18 consultation which undermines the robustness of the consultation
- Parking Standards are inadequate
- Consider emerging needs for electric cycles, cycle trailers and cargo cycles

### **Deliveries, Servicing and Construction**

- Include protection against sewage discharge into waterways by utilities
- Policy should be based on actual sizing and take account of increase in home deliveries
- Policy should be applied to individual households, conversions and demolish/ rebuilds
- Unclear what is defined as 'best practice construction techniques'

### **Waterways**

- Council must make provision of waterways to be controlled by British Waterways
- Make provision for the waterways to be monitored frequently
- As more people live on boats in canals in the UK, policy must set out how it will work with Waterways Trust to manage this
- Need to be more reference to general access and walking/cycling arrangements
- Comprehensive review of waterside locations should be undertaken identifying a programme of improvements to access and new sustainable development opportunities
- Assess chalk streams on their suitability for navigation
- Policy seems to favour building high value housing

### **Broadband and Electronic**

- Use Existing equipment to protect environment, plan for contingencies
- Make specific reference to minimising light and noise pollution
- Too much focus on visual impact, more focus for strategies that prioritise those who are digitally disadvantaged