

Appendix 6 - REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation

EMPLOYMENT AND ECONOMIC DEVELOPMENT

Q8. Do you think the Preferred Policy Option for Employment and Economic Development is the right approach?						
SC_00 012_D acorum Borough Council	Dacorum Borough Council		We would suggest that TRDC treat the South West Herts Economic Study (2019) with a degree of caution, particularly in translating office/industrial/warehouse floorspace figures into policy aims (paragraphs 5.8-5.9 in the Plan). We consider that it is important to take into account the wide-ranging implications of the COVID-19 pandemic and relaxation of national planning controls over commercial uses, on floorspace change across the SWH area as a whole.	<ul style="list-style-type: none"> Need to treat the South West Herts Economic Study with caution due to COVID and relaxation of planning controls across SWH as a whole 	Noted. However it makes sense to build for growth as the South West Herts Economic Study does identify a need for industrial floorspace.	No change
SC_00 019_W atford Borough Council	Watford Borough Council	yes	Support the provision and protection of industrial, storage and distribution uses as there is a shortfall of this type of employment land to meet development needs in Watford during the proposed plan period	<ul style="list-style-type: none"> support 	Noted.	No change
SC_00 020_C horley wood Parish Council	Chorleywood Parish Council	No	<p>There are a series of concerns / questions about this policy area:</p> <ul style="list-style-type: none"> Overall, there is no clear holistic vision presented by the new Local Plan that defines how the relevant elements of the plan (residential, retail, leisure, economic and employment) will be brought together in a mutually supportive way. For example, where major new developments are planned how a “proper” community will be created either integrating into existing communities or forming new communities with supporting services, facilities and employment opportunities. Sub-policy 1 defines an area of space that is required – 5.5 ha. This does not appear to fit well within a policy that is about shaping planning applications over the next 15 years. Whilst the overall area and proposed sites appear to be appropriate, this reference to a specific area should be covered by the Sites for Potential Allocation and not included within the policy. Under sub-policy 1, it states that there will be “a focus on industrial and warehouse uses” and then goes on to suggest that this should be allocated to town centres along with areas served by sustainable transport. Town centres are not ideal sites for industrial or warehouse uses which are better suited for other employment and economic development opportunities such as offices, services, retail and leisure. It would therefore be better to be clearer on the desired siting for each type of use - with offices, etc. being near town centres and industrial / warehousing being away from these areas though both should be served by sustainable transport. Under sub-policy 7, it makes clear that it might be acceptable to use existing B class floor space for other purposes if it can clearly be shown that there is no longer any use for the employment space. However, no such allowance for non-employment use of newly allocated employment sites is given in sub-policy 5. This makes no sense as changing economic circumstances can apply to newly allocated space as much as existing space. Therefore, such an exception should be included under sub-policy 5 	<ul style="list-style-type: none"> Overall, there is no clear holistic vision presented by the new Local Plan that defines how the relevant elements of the plan (residential, retail, leisure, economic and employment) will be brought together in a mutually supportive way. Sub-policy 1 defines an area of space that is required – 5.5 ha. This does not appear to fit well within a policy that is about shaping planning applications over the next 15 years. Under sub-policy 1, it states that there will be “a focus on industrial and warehouse uses” and then goes on to suggest that this should be allocated to town centres along with areas served by sustainable transport. Town centres are not ideal sites for industrial or warehouse uses which are better suited for other employment and economic development opportunities such as offices, services, retail and leisure. Under sub-policy 7, it makes clear that it might be acceptable to use existing B class floor space for other purposes if it can clearly be shown that there is no longer any use for the employment space. However, no such allowance for non-employment use of newly allocated employment sites is given in sub-policy 5. This makes no sense as changing economic circumstances can apply to newly allocated space as much as existing space. Therefore, such an exception should be included under sub-policy 5 	<ul style="list-style-type: none"> Noted. The vision will be worked up at the next reiteration of the local plan. Noted. Sub Policy 1 to be amended to clarify 5.5ha refers to industrial/ warehouse uses only and that industrial and warehouse uses will be supported in designated employment locations not town centres. Sub-policy 7. Disagree. New allocations for employment respond to demand for new industrial/ office floorspace based on evidence as set out in the South Herts Economic Strategy, 2019. 	<ul style="list-style-type: none"> Amend sub-policy 1 to clarify industrial and warehouse uses will not be supported in town centres only in designated employment areas. Amend policy to clarify 5.5ha refers to industrial land not offices. Amend sub policy 7 to clarify change of use to non-employment uses in employment locations.
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		Croxley Green Parish Council has concerns that the pressure to redevelop “brownfield” sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services. Otherwise, In general, we support the approach.	<ul style="list-style-type: none"> Support approach. 	Noted.	No change
SC_00 024_A bbots Langle y Parish Council	Abbots Langley Parish Council		1.8 suggests a need for office space and confirms that all the future needs will be met with Croxley Park? That suggests vehicle based commuting? Surely we should be looking at creating community based work ‘hubs’ to accommodate localised work from village centres near to amenities to bolster the local high street? In the last two years we have seen a ‘shift’ from the traditional office based work. Potentially smaller satellite office accommodation could free up some of the large office sites for housing.	<ul style="list-style-type: none"> Shift from traditional office based work and want to consider creation of community based hubs. 	NPPF makes clear town centres are the key designations for new offices and/or designated employment areas. A new employment land study could identify the type of new employment we need i.e., affordable workspace.	SW Herts authorities have indicated they are looking to update the existing Economic and retail and leisure studies in the new year.
SC_00 025_St Albans City	St. Albans City and District Council		As stated at previous Duty to Cooperate meetings and on 12 July 2021, SADC may be in a position to support South West Herts Authorities in meeting the potential collective shortfall in employment land based on the current South West Herts	<ul style="list-style-type: none"> 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). 	Noted.	Continue ongoing DTC discussions.

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and District Council			Economic Study Update (2019). However, SADC's Local Plan is at an early stage and no decisions have yet been made.			
SC_00 026_H CC Growth and Infrastructure	HCC Growth and Infrastructure		Minerals and Waste Planning. The safeguarding of employment uses for business, industrial and storage or distribution uses is welcomed, along with the delivery of additional employment space. This is important from the Waste Planning Authority's perspective as the adopted Waste Site Allocations DPD designates Employment Land Areas of Search (ELAS) within the district, where the location of waste management uses are considered acceptable in principle. The county council would not therefore wish to see the loss of such land within the district. It is considered that paragraph 5 could be strengthened through the consideration of the 'Agent of Change' principle (NPPF, paragraph 182) which states that planning decisions on new developments should ensure integration with existing business such that they do not have unreasonable restrictions placed upon them.	<ul style="list-style-type: none"> Support. It is considered that paragraph 5 could be strengthened through the consideration of the 'Agent of Change' principle (NPPF, paragraph 182) 	Noted	Reference to the Agent of change principle to be incorporated within supporting test within the Sustainable development Policy.
P1_00 002		Yes	Yes, but quality of these environments must be improved with proper design criteria rather than the relaxed approach at present.	<ul style="list-style-type: none"> Agree with approach but quality of the environments must be improved 	Noted	No change
P1_00 003		No	Need to protect existing offices and businesses from redevelopment into residential	<ul style="list-style-type: none"> Protect offices and businesses from redevelopment into residential 	The council has proposed a new A4D to cover the key employment areas. PDR changes introduced a new Class E which now includes business, services, community uses. This is therefore permitted development.	No change
P1_00 005		Yes	Nothing to add	<ul style="list-style-type: none"> No Comment 	Noted	No change
P1_00 006			Careful scrutiny must be made regarding all aspects of this. I am not in agreement of businesses being set up at home which impact negatively on the immediate area. My example being car mechanics working from home, where local parking issues already impact neighbours. With toxic and dangerous materials stored in residential areas should be totally prohibited. Residential areas should remain such!	<ul style="list-style-type: none"> Not in agreement of businesses being set up at home, such as mechanics working from home on cars and impacts on residents health with fumes and materials 	Noted	No change
P1_00 014		Yes	It sounds right but again, the reality will tell the story. Employment opportunities should be of priority over warehouse and storage. Emphasis on the latter suggests an imbalance somewhere and an overproduction of replaceable goods rather than recycling and reusing.	<ul style="list-style-type: none"> Agree with approach but should be more emphasis on employment opportunities over warehouse and storage, as latter will lead to overproduction of replacement goods. 	Noted. The SW Herts Economic Study identified a shortfall in future industrial warehouse and distribution provision and the need for such space.	No change
P1_00 017		No	Keep any industry away from residential	<ul style="list-style-type: none"> Keep Industrial uses away from residential areas. 	The council has proposed a new A4D to cover the key employment areas. PDR changes introduced a new Class E which now includes business, services, community uses. This is therefore permitted development.	No change
P1_00 019		Yes	Support	<ul style="list-style-type: none"> Support 	Noted	No change
P1_00 020		Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	No change
P1_00 021		Yes	seems to make use of what is already there	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 023		Yes	A minimum number of employees per hectare should be considered as warehouse developments, for example, can occupy large areas of land but if using robots, may employ very few people.	<ul style="list-style-type: none"> Minimum number of employees per hectare should be considered as warehouse developments. 	Noted	No change
P1_00 024		No	<ul style="list-style-type: none"> My concern here is that increasing the level of industrial, storage and distribution use will also increase noise and pollution levels alongside an increase in commercial traffic. Many of the existing roads in the area are not built for traffic of this type. I think focus should be on expanding employment opportunities in the creative industries such as Film, TV and Music, and the early years care sector. 	<ul style="list-style-type: none"> Increasing levels of industrial and storage will increase noise pollution and more traffic when roads in area not built for HGV Traffic Focus should be on expanding employment opportunities in the creative industries such as Film, TV and Music, and the early years care sector. 	Noted. The SW Herts Economic Study identified a shortfall in future industrial warehouse and distribution provision and the need for such space. Preferred Policy 8 promotes and supports warner Bros Studios.	No change
P1_00 025		No	Less requirement for businesses offices as following pandemic. Offices will just become white elephants.	<ul style="list-style-type: none"> Smaller requirement for office space due to COVID. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 026		Yes	Provision of local workplaces essential	<ul style="list-style-type: none"> Agree with approach 	Noted	No change

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P1_00 032	Yes	It's important to have more employment opportunities in the area rather than just be commuter belt	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 033	Yes	it recognises rural areas	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 034	No	Area not suitable for industrialisation, no more unless suitable for retail	<ul style="list-style-type: none"> Area not suitable for industrialisation, more retail 	Noted. Some industrial processes are now acceptable within residential areas in response to PDR changes, subject to residential amenity. This is permitted development.	No change
P1_00 038_	Yes	Local employment is essential if the town is to develop and to reduce the need for travel / commuting.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 040	No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> Do not develop Green Belt Land. 	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	No change
P1_00 041	Yes	Employment opportunities must always be considered. Residents prefer to work near to where they live, and we need to consider travel costs and environmental impact.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 045	No	The intention to support warehouse-type business is wrong. Such businesses have a significant impact on the local community but have little benefit in terms of employment volumes. In general, the council would do better to consider its existing strengths, for example in the creative industries and in construction services and identify ways to encourage growth; perhaps in allocating space for training establishments and by favouring developments which support these uses.	<ul style="list-style-type: none"> Do not support warehouse-type business. Of no benefit to local community. Council should consider its existing strengths, for example in the creative industries and in construction services and identify ways to encourage growth; allocating space for training establishments and by favouring developments which support these uses. 	Noted. The SW Herts Economic Study identified a shortfall in future industrial warehouse and distribution provision and the need for such space. Preferred option 8 promotes and supports greater development at Warner Bros Studios.	No change
P1_00 046	Yes	But consideration must be given to increased working from home	<ul style="list-style-type: none"> Agree with approach but increased working from home must be considered. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 047	No	Leavesden Studios should not be allowed to expand beyond its current envelope, as this would almost certainly lead to development on green field sites or Green Belt, which would have a devastating impact on biodiversity at a time of an ecological crisis.	<ul style="list-style-type: none"> Do not allow expansion of Leavesden Studio as will develop Green Belt Land. 	Noted	No change
P1_00 048	Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 049	Yes	Having 12mths as the benchmark for vacant properties is a good idea.	<ul style="list-style-type: none"> Agree with approach especially 12months as benchmark for vacant properties. 	Noted	No change
P1_00 050		It is important that business sites are used for business and not allowed to be used for homes, pushing business out to other new area.	<ul style="list-style-type: none"> Do not allow conversion of business sites into residential use 	Noted	No change
P1_00 053	Yes	Agree with approach but no alternatives suggested	<ul style="list-style-type: none"> Agree with approach but no alternatives suggested 	Noted. There are no alternative options unless we consider high, medium and low growth options.	SW Herts authorities have indicated new studies will be prepared to take account of PDR changes and new population projections.
P1_00 054	Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 055	Yes	Mixing employment spaces with new homes is a good option	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 056_	Yes	Achieves a balance between residential and commercial developments.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change

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P1_00 063	Yes	Agree as above.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 064	Yes	The increased population will need local jobs	<ul style="list-style-type: none"> Agree with approach. Increased population will need local jobs 	Noted	No change
P1_00 066	Yes	Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 068	No	Why is Leavesden Studios such a sacred cow? A few years ago you were allowing large developments all around it - some of which look pretty poor now! What clout do Warner Bros have with the Council? You'll have to give MUCH MORE DETAIL on the "B" designation! What do you have in mind? All 20 odd acres of B8? or a mixture of industrial fumes?	<ul style="list-style-type: none"> Need more details on the B designation, i.e. make-up of the designation 	Noted. The SW Herts Economic Study set out the types of employment uses that are relevant to SW Herts authorities.	No change
P1_00 069	No	Do not agree with approach	<ul style="list-style-type: none"> Do not agree with approach but no comment 	Noted	No change
P1_00 074		I suggest that the needs for employment and economic development have been changed by Covid 19 with people continuing to work from home. This is good for reducing transport and should be encouraged. It seems odd to require more offices to be built when several blocks have recently been converted into flats. I propose that new developments or existing conversions should consider including home office space.	<ul style="list-style-type: none"> Employment has changed since COVID-19, reduces transport and should be encouraged. Do not need more offices as several blocks have recently been converted to flats. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 076	No	I think the need for office space will need to be reconsidered once the new work balance since the pandemic and ease of working from home has been established.	<ul style="list-style-type: none"> Figures need to be reconsidered due to increased working from home. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 077	Yes	Local business is very important.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 078_	Yes	Reasonable for a balanced future for the area.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 080	No	Infrastructure cannot cope	<ul style="list-style-type: none"> Infrastructure cannot cope 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan.	No change
P1_00 084	Yes	Usage is in keeping with the buildings and not being used for other purposes.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 088	Yes	You appear to be ignoring the single person, or 2 people business. Many businesses do not have or require a special premises, but they exist because the workers have older homes which come with: Gardens. I have many business meetings in specially built garden offices, or loft or garage conversions. I know people who converted their garage into a play group and nursery. When I see new build developments, they rarely come with gardens big enough, or options to extend, convert lofts etc. Having space brings much more working opportunities. And as I have mentioned earlier many lower paid workers need safe space to park work vehicles and store heavy tools.	<ul style="list-style-type: none"> Appear to be ignoring single person/ 2 person businesses; Need to take more account of older homes which come with offices and gardens; Many workers need storage space. 	Noted. Conversions for home offices are discussed within the housing policies.	No change
P1_00 089	Yes	To help the economic growth of the area without affecting the surroundings and environment.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 096	Yes	Seems a pragmatic approach	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 097	Yes	Important to keep employment centres to certain distinct places to avoid sprawl.	<ul style="list-style-type: none"> Agree with approach 	The council has proposed a new A4D to cover the key employment areas. PDR changes introduced a new Class E which now includes business, services, community uses. This is therefore permitted development.	No change
P1_00 098	Yes	As long as there is evidence for this	<ul style="list-style-type: none"> Agree with approach 	Noted. The SW Herts Economic Study identifies the scale of future provision and the types of employment needed to support the SW Herts area.	No change
P1_00 099	Yes	Where evidence based.	<ul style="list-style-type: none"> Agree with approach 	Noted. The SW Herts Economic Study identifies the scale of future provision and the types of employment needed to support the SW Herts area.	No change
P1_00 101	No	Local councils have very limited ability to influence where businesses choose to locate. Just let the market take its course	<ul style="list-style-type: none"> Councils have limited ability to influence where businesses locate, let the market take its course 	Noted	No change
P1_00 102_	Yes	Important to provide jobs for residents.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 103	Yes	No opinion	<ul style="list-style-type: none"> No Comment 	Noted	No change
P1_00 107	No	Business development should only take place in already developed areas. No greenbelt should be lost to business development.	<ul style="list-style-type: none"> Business development should only take place in developed areas, not on Green Belt Land. 	Noted	No change
P1_00 108	Yes	I am not experienced enough to say	<ul style="list-style-type: none"> No Comment 	Noted	No change

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P1_00 110	No	No. PPO7 should be reconsidered in terms of the re-use of land and floor space for the Local Plan due to the anticipated changes in demand for land by different sectors of the local economy. The consequences of the pandemic and the work patterns likely to result over the medium to long term from these, are likely to require a more flexible approach in respect of 'unallocated' employment sites. PPO7 may now be unreasonable in terms of requiring evidence of marketing and vacancy for at least a year. The stated amount of land and floor space needed cannot now be justified on the basis of the out of date studies referred to, including the South West Herts Employment Study (SWHES) 2019, which is stated to be the principal source.	<ul style="list-style-type: none"> Needs to be reconsidered in regards to re-use of land and floorspace due to changes in demand due to COVID; May now be unreasonable to require evidence in marketing and vacancy for at least a year; Based on out of date evidence, such as SWHES which was pre-pandemic. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 112	Yes	Be mindful that COVID-19 has forced many people to work from home and that some businesses have already closed offices	<ul style="list-style-type: none"> Take account of increased working from home due to COVID. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 113	No	I think you could be more aggressive. This is an attractive area for knowledge businesses, you could do more to attract them	<ul style="list-style-type: none"> Be more aggressive in attracting businesses to the area 	Noted. By providing land and premises for employment use we can attract more investment to the area.	No change
P1_00 114	Yes	concur with plan	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 116	Yes	I agree with the policy as stated.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 117	Yes	Encouraging business in business areas	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 119	No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> Land is sanctuary for wildlife. 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	No change
P1_00 120	Yes	It appears to be a sensible approach.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 123	No	You need to remember that post-Covid work patterns may change with, for example, less demand for office space and more emphasis in leisure activities. You need to ability to be flexible in the new world	<ul style="list-style-type: none"> Need to be more flexible as a result of COVID with less demand for employment space and more demand for leisure space. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 127	Yes	Area needs jobs	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 130	No	This is not the right approach	<ul style="list-style-type: none"> Do not agree with approach 	Noted	No change
P1_00 131	No	Needs revisiting post Covid and the drive to true home working. I suspect your basic assumptions regarding 'employment space' are no longer valid.	<ul style="list-style-type: none"> Need to review due to COVID, less demand for employment space and COVID 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 132_	Yes	balanced approach best	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 133	Not Stated	It is not clear what policies will be adopted so as to ensure retention of employment space? It would also be appropriate to consider more extensively the type and level of traffic generated to/from employment space and bring this into consideration.	<ul style="list-style-type: none"> What policies will be adopted to ensure retention of employment floorspace; Need to consider traffic impacts for the employment space. 	The council has proposed a new A4D to cover the key employment areas. PDR changes introduced a new Class E which now includes business, services, community uses. This is therefore permitted development. All new applications for development need to demonstrate access, traffic generated.	No change
P1_00 135	No	The Plan should look favourably on applications for businesses carrying out maintenance, repair and refurbishment. The Plan should recognise and safeguard existing businesses outside of allocated employment areas. We have concerns that the pressure to redevelop 'brownfield' sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services.	<ul style="list-style-type: none"> Look favourably on businesses carrying out maintenance, repair and refurbishment; Safeguard existing businesses on allocated sites; Redeveloping brownfield sites will drive businesses out of the area. 	Noted. The council has proposed a new A4D to cover the key employment areas. PDR changes introduced a new Class E which now includes business, services, community uses.	No change
P1_00 138	Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 140	Yes	Agree with the points outlined	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 142_	No	Do not agree with approach	<ul style="list-style-type: none"> Do not agree with approach but no comment 	Noted	No change
P1_00 144	Yes	Local employment is a preferred option	<ul style="list-style-type: none"> Agree with approach 	Noted	No change

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P1_00 147	No	You should be looking to ensure all development in the councils region looks to support local employment and business but getting developers to source locally where possible or encourage new local businesses	<ul style="list-style-type: none"> Ensure all developments in council's region look to support and encourage local employment and source locally. 	Noted	No change
P1_00 148	Yes	Agree with approach	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 150	No	I do not agree with the approach. The policy should be reconsidered in terms of the re-use of land and floor space for the Local Plan due to the anticipated changes in demand for land by different sectors of the local economy. The consequences of the pandemic and the work patterns likely to result over the medium to long term from these, are likely to require a more flexible approach in respect of unallocated employment sites.	<ul style="list-style-type: none"> Do not agree with approach, employment figures need to take into account the impacts of COVID. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 151	No	There needs to be consideration of the impact on traffic generated by the employment use on local communities, and the parking generated by that employment use. This is particularly needed in areas alongside the M25 and adjacent to junctions, which already suffer from excessive traffic and congestion whenever there is a problem on the M25.	<ul style="list-style-type: none"> Consideration of traffic impacts on local impacts; Particularly needed alongside M25 which suffer from M25 Traffic. 	Noted. All site allocations will be required to meet HCC transport policy	No change
P1_00 155	Yes	It is especially important to have space for smaller businesses as our economic climate changes. Post pandemic the way the economy and way we live is likely to change and in addition post Brexit we do need to think of more home-grown industries We do need to consider how we will be working with the shift to more working at home and how this will impact what kind of businesses are needed locally to support a population that is a hybrid of homeworking and commuting	<ul style="list-style-type: none"> Need to take account of Brexit and COVID impacts. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 157	No	Changes in demand for land from different local economy sectors are expected since the pandemic and the policy should reflect these. It is very likely that more people carry on working from home in the future and this may require a more flexible approach in respect of current employment sites.	<ul style="list-style-type: none"> Changes in employment demand expected since the pandemic, policy needs to be more flexible. 	Noted. PDR changes introduced a new Class E which now includes business, services, community uses. This is therefore permitted development.	No change
P1_00 162	Yes	Ensuring transport and places of work are linked is very important.	<ul style="list-style-type: none"> Agree with approach, ensure that transport and places of work are linked 	Noted	No change
P1_00 164	Yes	I have lived for 50 years in the Sarratt Parish and it is very noticeable to me how many local businesses offering employment have been lost - i.e. ones to which I could walk or cycle, Also a lack of people now providing services from their homes. Most people of working age now leave the parish to go to their place of employment.	<ul style="list-style-type: none"> Local Businesses in Sarratt have been lost and lots of people providing services from their homes. 	Noted	No change
P1_00 166	Yes	Don't Know	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 167	Not Stated	<p>I. Section on employment and economic development.</p> <p>i. There is no summary of the types of employment which will best fit the characteristics of the local workforce which is a substantial oversight. Poor choices lead to local blight and unviable development.</p> <p>ii. There is no mention of the impact of automation on various industries and the effect on the TRD workforce. For example, warehouses are becoming completely automated, and so will offer minimal employment. Other choices may offer better medium and long term opportunities for the local workforce.</p> <p>iii. Point 1 on page 37 makes no reference to trade offs in situations where local amenity may be destroyed through the location choices of employment sites, and no reference to the negative impacts on local green spaces. This is a substantial oversight.</p> <p>iv. Point 5.6 on page 38 and point 5.8 on page 39. There is no assessment of the impact of covid on this trend which is a substantial oversight.</p> <p>v. Point 5.8 on page 39 There is no mention of the fact that the Maple Cross warehouse site allocation would result in; damage to the local water supply, loss of local amenity, damage to the local nature reserve and many other points. Given the amount of evidence supplied this is an astonishing oversight and I can only presume that the author of this section of the report is unaware of these – and other points. Unfortunately, this type of statement only fuels the suspicion that local feedback isn't taken into consideration on the construction of these plans and that the Council has effectively declared war on its own residents.</p>	<ul style="list-style-type: none"> No summary of employment types which will best fit with characteristics of local workforce; No mention of automation on various industries; Point 1 on page 37 make no reference to trade-offs where local amenity may be destroyed through location choices of employment sites and no reference to negative impacts on green spaces. Point 5.6 on page 38 and point 5.8 on page 39. No assessment of the impact of covid on this trend Point 5.8 on page 39. No mention of the Maple Cross warehouse site allocation would result in; damage to local water supply, loss of local amenity, damage to local nature reserve and other points. Evidence has been provided to substantiate this. Question 8 – Has not taken into consideration: impact of covid; empty offices in the district, automation. Need to reword accordingly. 	Noted. The SW Herts Economic Study identifies the scale of future provision and the types of employment needed to support the SW Herts area.	SW Herts authorities have indicated new studies will be prepared to take account of PDR changes and new population projections.

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			vi. Question 8 – this part of the report has not taken into consideration- the impact of covid, the many empty offices in the district, the fact that warehousing automation means this segment will not offer local jobs, the poor fit between the profile of the local workforce and the requirements of warehousing operations. A substantial reworking of this section is required.			
P1_00 170		Yes	Whilst the plan identifies the expansion of Leavesden Studios and the business park at Croxley Park, neither of these are readily accessible by "Green" Public Transport and the plan contains nothing to address these shortcomings. See also earlier comments with Chorleywood being a location preferred by commuters to London.	<ul style="list-style-type: none"> Croxley Park nor Leavesden Studios are not accessible by Green Transport and plan does nothing to address this; Chorleywood preferred by commuters. 	Noted. Requirements for warehouse and distribution employment require good transport network to facilitate operations.	No change
P1_00 174		No	Has the effect of the pandemic on remote working and the expected effect of future automation of human labour been accounted for in this provision of office space? The impact of the pandemic and projected social and economic trends are likely to create many more opportunities for the conversion of commercial and other space to residential use and changes in the form and function of workspace which are not taken into account in the Local Plan. If, as 5.6 states, the local economy is predominantly office based and many office jobs are able to be done at least partly remotely, should there not be a push for local businesses to pursue greater home working in order to free up under-utilised office space already in existence, before taking more land to develop additional office space? This will have the added benefit of reducing greenhouse gas emissions associated with commuting, and therefore help to reduce the Districts contribution to climate change and air pollution.	<ul style="list-style-type: none"> The effects of the pandemic and the automation of human labour have not been taken account of in the provision of office space. 	It is too early to determine the longer term impacts of COVID and automation on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	SW Herts authorities have indicated new studies will be prepared to take account of PDR changes and new population projections
P1_00 181		Yes	This broadly covers what we would expect.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 183		Yes	As summed up in plan	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 184		No	The pressure to redevelop "brownfield" sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services. There should be a policy to support businesses carrying out maintenance, repair and refurbishment locally, to support the circular economy	<ul style="list-style-type: none"> Look favourably on businesses carrying out maintenance, repair and refurbishment; Redeveloping brownfield sites will drive businesses out of the area 	Noted	No change
P1_00 186		No	This development will have a negative impact on the infrastructure and environment	<ul style="list-style-type: none"> Infrastructure cannot cope with levels of growth. 	Infrastructure requirements will be identified in the Infrastructure Delivery Plan	No change
P1_00 187		No	The pressure to redevelop "brownfield" sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services. There should be a policy to support businesses carrying out maintenance, repair and refurbishment locally, to support the circular economy	<ul style="list-style-type: none"> Look favourably on businesses carrying out maintenance, repair and refurbishment; Redeveloping brownfield sites will drive businesses out of the area 	Noted	No change
P1_00 190		Yes	Sensible approach	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 191		No	The plans for further development should be reviewed to take into account new ways of working and shopping since the pandemic	<ul style="list-style-type: none"> Need to take account of COVID and changing working patterns. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 201		Yes	Everyone has to have somewhere to work, but businesses are struggling at the moment - it needs to be economically viable for them to rent shop space in high streets otherwise there is no point in offering such retail space.	<ul style="list-style-type: none"> Needs to be economically viable to rent shop space in high streets. 	Noted.	No change
P1_00 204		Yes	It appears appropriate to the needs.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 206		Yes	New communities need to have new work opportunities - however, the validation against the local community needs to be done in depth, as to not dilute the existing offerings. There are already plenty of industrial areas and shops/leases available locally.	<ul style="list-style-type: none"> New communities need work opportunities, but for this to be done in depth. There are already plenty of industrial areas and shops/leases available locally. 	Noted. The SW Herts Economic Study identifies the scale of future provision and the types of employment needed to support the SW Herts area.	SW Herts authorities have indicated new studies will be prepared to take account of PDR changes and new population projections.
P1_00 209		No	The proposals I have seen only account for housing. In fact in the Carpenders Park area, where there is an existing business park, the suggested use for the available land is residential only	<ul style="list-style-type: none"> Proposals only seem to plan for residential, example Carpenders Park which is employment, only plan for residential. No alternative option 	Noted. Alternative options would be restricted to employment growth scenarios.	No change
P1_00 211		No	The Plan should look favourably on applications for businesses carrying out maintenance, repair and refurbishment and the Plan should recognise and safeguard existing businesses outside of allocated employment areas.	<ul style="list-style-type: none"> Look favourably on businesses carrying out maintenance, repair and refurbishment, safeguard these sites. 	Noted	No change

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P1_00 215	No	Revisit this. It's clear that with Covid WFH is going to become more mainstream. Encouraging more WFH and flexible working times and locations.	<ul style="list-style-type: none"> Does not take account of increased working from home due to COVID. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 218	No	No, this preferred policy option is now out of date. The age of the large office block as an employment crutch for any town centre has gone. The local plan needs to be looking at the use of former retail and service sector properties on the High Street as locations for different types of employment to develop and grow. The local plan needs to be looking at the use of former retail and service sector properties on the High Street as locations for different types of employment to develop and grow. As said earlier, there is scope to support community hubs, and hot-desking facilities for office work and meeting space to save on actually owning or running a building of offices. To be resilient in the face of climate change and the decrease in international trade of Brexit, then we need to be growing and manufacturing our own food and goods much, much more. Therefore we should look at the fertile soil and landscapes of this district and look at job and food creation opportunities.	<ul style="list-style-type: none"> The local plan needs to be looking at the use of former retail and service sector properties on the High Street as locations for different types of employment to develop and grow. 	Noted. The preferred option does set out this approach.	No change
P1_00 219	No	This plan assumes that the increase in housing development will be agreed by those who live within Three Rivers.	<ul style="list-style-type: none"> Plan assumes growth in housing will be agreed by those residents who live here. 	Noted. All local Authorities need to plan for growth to meet local needs for jobs and homes	No change
P1_00 222	No	The Plan should look favourably on applications for businesses carrying out maintenance, repair and refurbishment. The Plan should recognise and safeguard existing businesses outside of allocated employment areas. We have concerns that the pressure to redevelop "brownfield" sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services. Businesses need premises at affordable prices or rents. There are Three Rivers residents who run or would run a business locally or be employed in it, be it an innovative start-up or a more traditional craft or engineering business, a service or a retail business that offers an alternative to the supermarket chains. These local businesses stop Three Rivers from being just a dormitory town of London. New developments have caused viable small businesses to be evicted from their rented premises and forced to move to another area, to make room for private housing.	<ul style="list-style-type: none"> Look favourably on businesses carrying out maintenance, repair and refurbishment; Safeguard existing businesses on allocated sites; Redeveloping brownfield sites will drive businesses out of the area; Local Businesses stop Three Rivers from being another dormitory town of London. 	Noted	No change
P1_00 223	Yes	We need protected employment sites but I thought the Government allowed change of use.	<ul style="list-style-type: none"> Agree with approach – Need to protect employment sites, government has allowed change of use. 	PDR changes introduced a new Class E which now includes business, services, community uses. This is therefore permitted development.	No change
P1_00 224	No	After the pandemic we might need to review just what employment is needed and in what way...Rickmansworth High Street is now a ghost town.. full of empty shops and a street closed off which has NOT helped and should now be open after lockdown. PLEASE ACT ON THIS! See Wendover or Berko... all vibrant areas!	<ul style="list-style-type: none"> Need to review following COVID; Need to look at Rickmansworth centre as empty with all the shops; Wendover is a good example of a vibrant centre. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 227	No	The pressure to redevelop brownfield sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services	<ul style="list-style-type: none"> Pressure to redevelop brownfield sites is driving smaller businesses out of the area. 	Noted	No change
P1_00 232	No	The Plan should look favourably on applications for businesses carrying out maintenance, repair and refurbishment, recycling upcycling. The Plan should recognise and safeguard existing businesses outside of allocated employment areas. I have concerns that the pressure to redevelop brownfield sites is driving smaller businesses out of the area, reducing local employment opportunities and increasing travel and transport distances to access vital services. Businesses need premises at affordable prices or rents. There are Three Rivers residents who run or would run a business locally or be employed in it, be it an innovative start-up or a more traditional craft or engineering business, a service or a retail business that offers an alternative to the supermarket chains. These local businesses stop Three Rivers from being just a dormitory town of London. New developments have caused viable small businesses to be evicted from their rented premises and forced to move to another area, to make room for private housing.	<ul style="list-style-type: none"> Look favourably on businesses carrying out maintenance, repair and refurbishment; Safeguard existing businesses on allocated sites; Redeveloping brownfield sites will drive businesses out of the area; Local Businesses stop Three Rivers from being another dormitory town of London. 	Noted	No change

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P1_00 233		Yes	I have no objections to the Preferred Policy Option for Employment and Economic Development is the right approach.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 234		Yes	I have no objections to the Preferred Policy Option for Employment and Economic Development is the right approach.	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 236		Yes	Stipulations make sense	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 240		Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 244		No	There is no correlation between buildings and sites allocated for "employment" and employment per se. For example, a vast amount of land could be allocated to a warehousing operation employing very few people, especially with new robotics. There needs to be a much clearer and more specific vision of appropriate employment for the area.	<ul style="list-style-type: none"> No correlation between buildings and sites allocated for 'employment' Vast amount of land could be allocated for warehousing which is automated. Need a clearer and more specific vision. 	Noted	Vision to be updated to provide support for the Three Rivers economy.
P1_00 251		No	Given the pandemic has had a monumental shift in attitudes to how working and online shopping the projection should be reviewed	<ul style="list-style-type: none"> Need to review due to changes due to the pandemic. 	It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review.	No change
P1_00 256		Yes	Seems reasonable	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 262		Yes	Agree with approach	<ul style="list-style-type: none"> Agree with approach 	Noted	No change
P1_00 266		No	This policy is also based on out dated statistics – post pandemic, post Brexit. Overall this policy fails to note that warehousing creates few jobs due to automation, house prices remain high, skill set of residents don't match the warehouse profile so will not provide local employment. Suggest that TRDC do some research into warehousing across the country in order that they truly understand employment within this sector as your current ideas do not match reality.	<ul style="list-style-type: none"> This policy is also based on out dated statistics – post pandemic, post Brexit. TRDC to undertake research into warehousing to understand it creates few jobs due to automation, house prices remain high, skill set of residents don't match the warehouse profile so will not provide local employment. 	Noted. It is too early to determine the longer term impacts of COVID on demand for office space. A review of the needs for office floorspace will form part of a future Local Plan Review. The SW Herts Economic Study identifies the scale of future provision and the types of employment needed to support the SW Herts area.	SW Herts authorities have indicated new studies will be prepared to take account of PDR changes and new population projections.
P1_00 271		Yes	Seems sensible	<ul style="list-style-type: none"> No alternatives suggested 	Noted. Alternative options would only consider employment growth scenarios.	No change
P1_00 275		No	Areas where there are manufacturing facilities or large employers, this is not the solution to sustainable employment	<ul style="list-style-type: none"> Areas where there is manufacturing facilities or large employers. 	Noted	No change
P1_00 282		No	No	<ul style="list-style-type: none"> Do not agree with approach but no alternatives suggested 	Noted	No change

Q8. Should we have considered alternative options?

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