

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Q7. Do you think the Preferred Policy Option for Residential Design and Layout and Accessible and Adaptable Buildings is the right approach?						
SC_P1_0008_Home Builders Federation	Home Builders Federation		<p>We could not find any evidence to support the adoption of the National Described Space Standards. It is important to recognise that the optional technical standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. The application of space standards has been considered in the viability assessment, however no we could not find any evidence as to the need for such standards that has been published by the Council.</p> <p>25. Whilst the HBF share the Council desires to see good quality homes delivered within Three Rivers we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms. Given the poor affordability of property in the area it is important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy.</p> <p>26. The HBF is also not aware of any evidence that market dwellings in the district that do not meet the NDSS remaining unsold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The latest survey published in 2021 demonstrates that 92% of new home buyers would purchase a new build home again and 91% would recommend their housebuilder to a friend. The results also conclude that 94% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.</p> <p>27. Given that there is little to suggest that development below space standards is an endemic concern within the district we would suggest that the requirement to meet NDSS is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.</p> <p>28. Similarly, the requirement that 10% of all homes on developments should be built to part M4(3) must also be based on evidence. The SW Herts LHNA estimates there is a need for 430 wheelchair user homes by 2036, however, that is not clear is how many homes this policy will deliver. This must be clearly set out by the Council in order for the proposed policy to be justified. In addition, the Council must make the distinction in the policy between wheelchair accessible housing and wheelchair adaptable housing. These are distinct categories with paragraph 56-009 of PPG stating that local Plan policies for wheelchair accessible homes should be applied “only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling”.</p> <p>29. With regard to self-build homes the HBF welcomes the clause allowing unsold plots to revert back to the developer to be built as market housing. However, given that the Council is required to have a register of those wishing to purchase a plot for self-build we would suggest that 18 months is too long and should be reduced to 12 months.</p>	<ul style="list-style-type: none"> No evidence to support adoption of National Space Standards (Paragraph 56-0002 of PPG states should only be introduced where needed) Space standards can have a negative impact upon affordability issues and reduce customer choice (eg some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms) No evidence of market dwellings in the District that do not meet NDSS remaining unsold or that those living in them consider their housing needs not met/that size of houses being built are considered inappropriate by purchasers/or that houses not built to NDSS are selling less well in comparison Requests the removal of the policy Requirement that 10% of all homes on development should be built to part M4(3) must be based on evidence. LHNA says need for 430 but not clear how many homes policy will deliver Distinction between wheelchair accessible housing and wheelchair adaptable housing needs to be made clear. PPG 56-0009 of PPG wheelchair accessible homes can only be applied to those properties local authority is responsible for allocating or nominating Self-build homes welcomes the clause allowing unsold plots to revert back to developer to be built as market housing but request that the 18 months is too long and should be reduced to 12 months 	<ul style="list-style-type: none"> The NPPF sets out that Local Plans may make use of these NDSS where the need for an internal space standard can be justified. Monitoring information shows that 193 dwellings (25%) permitted in Three Rivers between April 2015 and March 2019 were smaller than the NDSS. This is a significant proportion and suggests that there is a clear need to apply the NDSS to new housing development in Three Rivers. As such, requiring new development to generally accord with NDSS would provide for improvement to the quality of housing being delivered and resulting benefits for the general health and wellbeing of the community and a more flexible and adaptable housing stock better able to meet the needs of residents. Preferred Policy Option 6 Residential Design and Layout and Accessible and Adaptable Buildings sets out On developments of 50 or more dwellings: <ul style="list-style-type: none"> a) 10% of new homes should meet Building Regulations M4(2) standard (accessible and adaptable dwellings) and b) 10% of the affordable housing should meet Building Regulations M4(3) standard (wheelchair user dwellings) or subsequent standards in legislation to make homes accessible and adaptable. 18 months considered a reasonable timescale. 	Do we have evidence for the 18 months period?
SC_0002_O_Chorleywood Parish Council	Chorleywood Parish Council		<p>The emphasis on the importance of landscaping is welcomed and we hope officers follow through with this. It could be strengthened, emphasising front gardens have the potential to support biodiversity and SUDS. Too many front gardens are currently being paved over. We welcome the policy which states backland developments are inappropriate. It's unclear if the affordable housing requirement would apply to new units being created from the subdivision of existing houses. We welcome the inclusion of nationally described space standards. Overall a this appears to be a robust policy</p>	<ul style="list-style-type: none"> Overall this appears to be a robust policy The emphasis on the importance of landscaping is welcomed. It could be strengthened, emphasising front gardens have the potential to support biodiversity and SUDS. We welcome the policy which states backland developments are inappropriate. It's unclear if the affordable housing requirement would apply to new units being created from the subdivision of existing houses. We welcome the inclusion of nationally described space standards. 	<ul style="list-style-type: none"> Noted. Reference to SUDs and supporting biodiversity are covered under the relevant policies. Affordable housing policy applies to all schemes of 9 dwellings or more, regardless of how new units are created. 	No change

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

SC_0002 3_Croxley Green Parish Council	Croxley Green Parish Council		We consider the minimum standards for amenity space will lead to very cramped designs and are the absolute minimum that should be permitted. In particular we stress the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7). Draw attention to explaining what “character” covers and referring to more recent national guidance. We have a number of detailed comments on the Design Criteria in Appendix 1 to this consultation.	<ul style="list-style-type: none"> Stress the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7). 	Noted	No action
SC_0002 4_Abbots Langley Parish Council	Abbots Langley Parish Council	Yes	Support	Support	Noted	No action
SC_0002 6_HCC Growth and Infrastructure	HCC Growth and Infrastructure		LEADS. It is considered that this policy should be altered to make sure it is aligned with the National Design Guide and that it follows the principles in design coding and masterplanning. It is strongly recommended that this policy is revisited with reference to the NPPF and National Design Guide. It should be noted that North Herts District Council has recently had a masterplanning policy approved at the recent Local Plan Examination in Public (Policy SP9)1 and the district council may therefore want to use this as an approach to a similar policy in this local plan.	<ul style="list-style-type: none"> It is considered that this policy should be altered to make sure it is aligned with the National Design Guide and that it follows the principles in design coding and masterplanning 	Noted.	Check national design guide.
PL_0000 9_CFS13	Savills on behalf of Kebbell Homes Representations to Part 1: Preferred Policy Options'		<p>We consider that the requirement for a Health Impact Assessment (HIA) as currently referenced in PPO11 is unjustified. The nature of the assessment is not justified nor is it in line with guidance on HIA. At present, the policy requires a full HIA for any development over 100 dwellings. However, government guidance⁵ on establishing whether a HIA is required suggests that first a screening process should take place to establish whether it is necessary. It is not intended to apply a one size fits all approach. Key matters comprise the following amongst others:</p> <p><input type="checkbox"/> <i>Policy compliance - consider whether an HIA can help meet local policy</i></p> <p><input type="checkbox"/> <i>Proportionality - consider whether undertaking an HIA would be fair and reasonable</i></p> <p><input type="checkbox"/> <i>Alternatives- has it already been considered via EIA or is the HIA information already present in other documents.</i></p> <p>4.5 If deemed necessary the scope of the HIA should then be agreed on a proportionate basis. As drafted, the policy does not take this process into account.</p> <p>4.6 The impacts of a proposed development on human health and the population is already a consideration for development projects subject to the Environmental Impact Assessment (EIA) Screening process established via Schedule 3 of the EIA Regulations. Indeed, for any urban development project over 150 dwellings, the local authority are already required to consider and whether the proposed development would likely result in significant effects on a range of factors including human health and the wider population (either positively or negatively). If required, this would then be assessed and reported as part of a subsequent Environmental Statement. This process would be required to take place irrespective of PPO 11 but the policy could potentially duplicate, conflict with and complicate this processes. For an example, if an applicant requested an EIA screening and/or scoping opinion of the local authority and demonstrated that the impact upon population and human health was not significant, this could be scoped out of the Environmental Statement or the development may not require an EIA at all. Despite this, the requirements of PPO 11 would require the preparation of a full HIA alongside this in any case.</p> <p>4.7 To ensure a sound policy we would in the first instance suggest criterion 3 is deleted in its entirety and the matter be left to consideration as part of the EIA screening process as required. Alternatively, if this reference is considered to be necessary, we would suggest the threshold for assessment be increased to 150 dwellings (the same trigger for EIA screening for an urban development project under Schedule 2 of the EIA regulations) and the policy simply require the applicant to screen development with the Local Authority in relation to HIA in the first instance. If a proposed development was deemed to require HIA the scope could then be agreed with the Council. The supporting text should also make it clear that this screening and scoping exercise could take place as part of the wider consideration of a proposed development under the EIA regulations.</p> <p>4.8 This revised approach would ensure a sound policy which ensures the local authority still receive the information they require, but also ensures that the level of information and the associated process is proportionate and in accordance with wider guidance and the EIA regulations.</p>	<ul style="list-style-type: none"> Policy requirement for full HIA for developments of 100+ dwellings is unjustified as government guidance suggests that a screening process should establish whether a HIA is necessary and the scope is then agreed on a proportionate basis. Environmental Impact Assessment already considers whether developments would result in significant effects on a range of factors including human health. Should therefore remove the requirement for a HIA and leave this consideration to the HIA. Suggest threshold of 150 dwellings (similar to EIA screening threshold). 	<ul style="list-style-type: none"> Threshold of 100 dwellings based on Hertfordshire Public Health's Position Statement on HIAs: https://www.hertfordshire.gov.uk/media-library/documents/public-health/health/hia-position-statement.pdf. 100+ dwelling threshold will be retained to ensure consistency with guidance produced by the Hertfordshire Public Health department and Spatial Planning Unit. As stated in the Hertfordshire Position Statement, there is a difference between EIAs and HIAs. Following changes to EIA regulations in 2017, all EIAs are required to consider the impact on human health. Because EIAs are by definition focussed on environmental concerns, they do not consider social/health inequalities, and therefore cannot holistically assess health impact. The EIA regulations are not prescriptive on how impact on human health is assessed, however the Public Health position is that HIA is a tool that can assist development applications in meeting the human health requirements. 	No action
PL_0000 2_ACS8 b	ROK Planning on behalf of Woolbro Group		1.32 In general, the Preferred Policy Option is the right approach as it sets the parameters whilst Appendix 1 sets detailed design requirements. This is supported as being the most appropriate approach. Detailed comments are included on the design requirements in Appendix 1 from paragraphs 1.60 to 1.64 of these representations.	<ul style="list-style-type: none"> Right approach as policy sets parameters whilst Appendix 1 sets detailed design requirements. A revised NPPF has now been issued with updates to national design guidance so policy should be reviewed to ensure conformity with NPPF 	<ul style="list-style-type: none"> Noted. Noted and agreed that policy should be reviewed taking into consideration revised NPPF and updated national design guidance. 	Review policy in context of revised NPPF and updated national design guidance.

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

	210818 - TRDC Reg 18 - ROK OBO WOOLBRO FINAL		1.33 However, since the publishing of the consultation a revised NPPF (July 2021) has been issued which updates national design guidance. This should be reviewed by TRDC to ensure full conformity with the NPPF.			
PL_00014_CFS22	ROK Planning on behalf of landowner Regulation 18 representation		In principle, the preferred policy option is the right approach as it sets the parameters whilst Appendix 1 sets detailed design requirements. However, since the publishing of the consultation draft Local Plan a revised NPPF (July 2021) has been published which updates national design guidance. This should be reviewed by TRDC to ensure full conformity with the NPPF.	<ul style="list-style-type: none"> Right approach as policy sets parameters whilst Appendix 1 sets detailed design requirements. A revised NPPF has now been issued with updates to national design guidance so policy should be reviewed to ensure conformity with NPPF 	<ul style="list-style-type: none"> Noted. Noted and agreed that policy should be reviewed taking into consideration revised NPPF and updated national design guidance. 	No action
PL_00027_CFS64	Nexus Planning on behalf of Inland Homes		5.1 Criterion 2 of Preferred Policy Option 6 seeks for development to satisfy the Design Criteria outlined in Appendix 1 of the Consultation Document. 5.2 Appendix 1 outlines a number of requirements, and most notably the following (page 102 of the Consultation Document): “All proposals should be in keeping with the prevailing landscape/streetscape, reflecting the variety of local building types by using complementary building materials and designs, and should not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design. ” (Emphasis added) 5.3 This approach is consistent with the Framework, notably paragraphs 124 and 130, and is therefore supported by Inland Homes. 5.4 However, its application through the Plan is flawed given the site capacities identified for many potential housing allocations, will result in overdevelopment.	<ul style="list-style-type: none"> Re-states Design Criteria statement in relation to overdevelopment/unacceptable intensification and states this is consistent with NPPF. Application of policy relating to overdevelopment is flawed through the Plan as the site capacities identified for potential allocations will result in overdevelopment. 	<ul style="list-style-type: none"> Noted. DPH is indicative only and will be determined at the planning application stage. 	No action
PL_00029_CFS69	Bell Cornwell on behalf of DNA Capital		We support the Council in their approach to residential design and layout and accessible and adaptable building.	<ul style="list-style-type: none"> Support approach 	Noted	No action
P1_00002			This is completely inadequate; the design guidance as set out is inadequate and must be enhanced, be compulsory and include a restriction on buildings over 4 storeys high. The 45 degree rule must be applied to both front and rear of dwellings. Quality of new development must be improved and controlled with strict enforcements.	<ul style="list-style-type: none"> Completely inadequate, enhance and include a restriction buildings four stories and 45 degree rule applied to both front and rear of buildings 	Noted	None
P1_00003		Yes	No Comment	<ul style="list-style-type: none"> No Comment 	Noted	None
P1_00005		No	Although I think these policies head in the correct direction, they do not appear to address the environmental possibilities of new housing developments. I would include the requirement to provide heating without using gas or oil and to encourage provision of heat pumps and district heating whilst at the same making sure properties are designed with sufficient insulation and air flow. In addition, provision of electric car charging for all new accommodation should be mandated.	<ul style="list-style-type: none"> Do not address environmental possibilities of new housing developments. Need to include provision of heat pumps and district level heating; Need to include provision for electric charging points 	Noted	None
P1_00006		Yes	As indicated previously so long as extra dwellings are not crammed into small gardens and the amenity space ruling is adhered to, this seems reasonable.	<ul style="list-style-type: none"> Agree with approach as long as extra dwellings not added into small gardens and amenity space standards are adhered to 	Noted	None
P1_00014		Yes	Again, the proof will be in the implementation. It sounds right and appropriate.	<ul style="list-style-type: none"> Agree with approach. Ensure policy is implemented 	Noted	None
P1_00017		No	Specify minimum m2 per property for inside and outside	<ul style="list-style-type: none"> Need to specify minimum floorspace for the property 	Noted	None
P1_00019		Yes		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00020		Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00021		Yes	Seems well planned	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00023		Yes	ok	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00024		Yes	I support changing the use of existing buildings particularly if they are vacant and could be put to better use. I also feel that consideration should be given to adaptable dwellings that accommodate the needs of disabled or elderly people. Providing adequate parking is hugely important as many	<ul style="list-style-type: none"> Agree with approach. Consideration needs to be given to adaptable dwellings. 	Noted	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

			cars are currently parked on footpaths which is not only dangerous for pedestrians but results in congestion as traffic lanes are made narrower.	<ul style="list-style-type: none"> Provide adequate parking due to cars parking on footpaths 		
P1_00025	No		Proposed design Will have a negative impact on the character of the area, landscape already overtaken with high rise development.	<ul style="list-style-type: none"> Will have negative impact on the character of the area. 	Noted	None
P1_00026	Yes		Policy clearly stated and understood.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00027	Yes			<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00032	Yes		Building quality needs to be maintained	<ul style="list-style-type: none"> Need to maintain building quality 	Noted	None
P1_00033	Yes		It protects the character of the area	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00034	Yes		No strong feelings	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00038	Yes		A good infrastructure is important to reduce the needs for reliance on cars and any development must not impact excessively on the environment.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00040	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".	None
P1_00041	Yes		Suitable provision needs to be made.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00046	Yes		Design and accessibility are of paramount importance	<ul style="list-style-type: none"> Design and accessibility are important 	Noted	None
P1_00047	Yes		This is policy is correct.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00048	Yes			<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00049	Yes		Sustainability should be integral to all new developments.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00050	Yes		It is though it is critical this is applied in practice and not laid open to loose interpretation. We are left with the legacy of poorly planned buildings for potentially hundreds of years, so it's critical this is addressed.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00053	Yes			<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00054	Yes		Some control needs to be in place to keep a good standard of buildings.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00055	No		The character of the area will be compromised if semidetached houses are converted into flats. Please do not allow this to ruin the area.	<ul style="list-style-type: none"> If semi-detached homes are converted will compromise character of the area. 	Through Local Plan policy, any development would be required to	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

					respond to distinctive local character (including landscape character).	
P1_00056		Yes	WITH RESERVATIONS: 1. Needs to be modified to avoid encouraging high rise / high density developments. 2. Should spell out an intention to implement more effective compliance with relevant building standards, monitoring of developer activities, and enforcement actions; this requires investment by TRDC. 3. (Appendix 1): should make clear limits on the use of 'back garden' offices and their use (noise / intrusion), as well as subsequent conversion to more permanent dwelling areas.	<ul style="list-style-type: none"> Agree with approach with reservations. Need to modify to avoid high rise/ high density developments; Need to be clearer that will be more effective compliance with Building Regulations; Appendix 1 should make clear limits on use of back garden offices and preventing conversion to dwellings. 	Noted	None
P1_00057		No	Will cause excessive levels of traffic, parking, and crowded shops, and hospitality.	<ul style="list-style-type: none"> Will have an unacceptable impact on infrastructure 	Noted	None
P1_00059		No	Brownfield sites must be explored before any green space/green belt are considered. Eg CFS18b Hill Farm where 228 homes are applied for. There are ample brownfield options to explore with unused outbuildings, sheds, etc. This could accommodate at least 50 dwellings. Only when all brown field options have been exhausted should green belt/space be considered. And these must only be considered in tandem with existing infrastructure. All Building in Berry Lane is fraught with problems regarding road usage. CFS57& & PSCFS19 should not go ahead as it would create traffic havoc. The best greenspace/belt option is the Green Street East proposal, which has the best infrastructure possibilities.	<ul style="list-style-type: none"> Brownfield sites should be developed before Green Belt. Development along Berry Lane is a problem, CFS57 and PSCFC19 should not go ahead 	Noted	None
P1_00063		Yes	Agree with the approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00064		No	The focus is on new builds, a greater proportion of the new housing should be served by conversions of use from office space to residential	<ul style="list-style-type: none"> Greater proportion of new housing should be served by conversions of use from office to residential 	Noted	None
P1_00066		Yes	Agree	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00068		No	The Council falls foul already - do tell me how the Free Reach School does not create "excessive traffic"! It does, how could it not? Yet it was allowed. I've a feeling that every clause in this section would be broken too.	<ul style="list-style-type: none"> Free School Reach was promised not to create "excessive traffic" but does and query why it was allowed. 	Noted	None
P1_00069		No		<ul style="list-style-type: none"> Do not agree with approach but no reason given 	Noted	None
P1_00074			I agree based on the information provided, this clause does consider existing building conversions.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00076		Yes	It sounds sensible. I'm not sure how any new developments would work along Berry Lane and Long Lane. The access for large lorries will be impossible. These are completely inappropriate areas for new developments and will ruin the area.	<ul style="list-style-type: none"> Agree with approach but not sure how it work along Berry Lane and Long Lane, not appropriate areas to develop. 	Noted	None
P1_00078		Yes	An equitable policy to aspire to.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00080		No	No more , growth in the area is ridiculous	<ul style="list-style-type: none"> No more housing 	Noted	None
P1_00084		Yes	In line with building regulations	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00088		Yes	Appears to consider sensible issues	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00089		Yes	Any new development needs to be in with the keeping of existing houses/bungalows of Chorleywood.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00096		Yes	Seems Reasonable	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00097		Yes	Important to take account of limited access routes and infrastructure.	<ul style="list-style-type: none"> Agree with approach but needs to take account limited routes and infrastructure 	Noted	None
P1_00098		Yes	Change of use is one of the most sustainable approaches, this should be encouraged.	<ul style="list-style-type: none"> Agree with approach as most sustainable 	Noted	None
P1_00099_A Michaels (councillor)		Yes	N/A	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00101		Yes	Yes	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00102		Yes	Important to ensure quality of new development, in particular that they have sufficient space and are accessible for those who require them.	<ul style="list-style-type: none"> Agree with approach. Ensure developments have space and are accessible. 	Noted	None
P1_00103		No	Too many houses and not enough consideration for how rainfall will impact the area due to change of land use	<ul style="list-style-type: none"> Too many houses and development will lead to further rainwater runoff. 	Noted	None
P1_00107		Yes	Who gets to decide what efficient means? Efficient doesn't mean necessarily mean pleasant or appropriate, and I also doubt it means beneficial for nature. This sounds more like how can we maximise profit for developers.	<ul style="list-style-type: none"> Unclear what 'efficient' means, sounds like how profits can be maximised for developers. 	Noted	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

P1_00108	Yes	I am not experienced enough to say	<ul style="list-style-type: none"> No comment 	Noted	None
P1_00110	Not Specified	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00112	Yes	Again, providing you stick to this! For example, limit the number of high rise buildings in residential areas. An example of this is one proposal that was put forward was a tower block next to an area of predominantly 1930s 3-bed semis.	<ul style="list-style-type: none"> Agree with approach as long as Council stick to it. Example is proposal for tower block next to area of 1930's semi-detached housing. 	Noted	None
P1_00113	Yes		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00114	No	partly - no mention of ensuring planning and placement electrical charge of vehicles infrastructure is a core design consideration	<ul style="list-style-type: none"> No mention of placement of electrical charging points which is a core design consideration. 	Noted	None
P1_00116	Yes	I agree with the policy.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00119	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.	None
P1_00120	Yes	It is the right approach but the design and character of new development needs to be examined, policed, monitored and approved by a variety of qualified authorities and groups to prevent the building of ugly, windowless, overpowering, out of character and inappropriate residences such as those which have already emerged in nearby localities.	<ul style="list-style-type: none"> Agree with approach but design needs to be examined, policed and monitored to prevent ugly developments 	Noted	None
P1_00121	Yes	As long as its not on greenbelt its fine	<ul style="list-style-type: none"> Agree with approach as long as Green Belt Land is not developed 	Noted	None
P1_00123	Yes	Ok	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00127	Yes	Needs to be accessible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00130	No	You're the experts	<ul style="list-style-type: none"> Council are the experts 	Noted	None
P1_00131	No	See my previous comments about people wanting space. Also, no mention of truly 'green' building initiatives? Local area home heating, uprating local electric power supply for electric cars, high standards of insulation, solar electric panels / heating panels etc. etc.. And the 'Council's standards' on car parking appear woefully inadequate from all the recent housing developments I've seen! Finally, no mention of high speed broadband for home working and on street charging points for electric cars.	<ul style="list-style-type: none"> No mention of truly 'green' building initiatives e.g. electric car charging, high standards of insulation etc; Car parking standards are poor from recent development examples; No mention of high speed broadband. 	Noted	None
P1_00132	Yes	need be flexible and under review	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00133	Not Stated	The provisions of para 4.72 requires strengthening in respect of back land as the intention is unclear. Typically, houses on the edge of green belt have large rear gardens. This arrangement is a part of the gradual transition from brown field to green belt. This plan intends to develop the green belt with a density of not less than 50 units per hectare. Typically edge of green belt housing is 20 units per hectare or less. Thus, the new development could be argued to bring what was back land into the urban envelope necessitating a determination whether what was back land remains back land (giving rise to a less dense area surrounded by a more dense area) or is up for redevelopment; in which case the numbers and maths need changing.	<ul style="list-style-type: none"> Para 4.72 needs to be strengthened in respect of back land development as intention is unclear; Due to high density new development would bring what was back land back into urban envelope and therefore determine what is defined as back land and therefore figures need to be reviewed. 	Noted	None
P1_00135	No	We consider that a higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) or M4(3) standards.	<ul style="list-style-type: none"> Higher % of dwellings need to be built to M4(2) and M4(3) standards, at least 25%. 	Noted	None
P1_00138	Yes	No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00140	Yes	I have no reason to say no	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00142	No	I think you get the gist here	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00144	Yes	But High density is possible with moderate high rise buildings and mandatory shared green spaces adjacent, with less urban sprawl	<ul style="list-style-type: none"> Agree with approach. High density is possible with moderate high rise 	Noted	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

				buildings and mandatory shared green spaces.		
P1_00147	No	The council needs highlight the need for positive energy buildings		<ul style="list-style-type: none"> Council needs to highlight need for positive energy buildings. 	Noted	None
P1_00148	Yes	to create a a balanced local environment		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00150	No	I agree with the policy support for increased densities, but it needs to be made clear as to where this would be appropriate. Using 'character' as a reason is nonspecific. There could more specific references to such matters as the scale, massing, and bulk of buildings and their settings. The first part of Preferred Policy Option 6, sub-paragraphs (1) (6), needs to be re-written, with supporting text, in the context of Chapter 12 of the NPPF 2021, the Building Better, Building Beautiful (BBBB) report, and the new National Model Design Code. The role of Neighbourhood Plans in delivering this policy should be acknowledged.		<ul style="list-style-type: none"> Agree with increased densities, but need to make clear where. More specific references to matters such as scale, massing and bulk of buildings and settings; Need supporting texts from NPPF and National Model Design Code; Role of Neighbourhood Plans should be acknowledged. 	Noted	None
P1_00151	Yes	In order to protect the Green Belt, some sub-division of existing houses will be necessary, but it needs to be done sympathetically in order to retain the characters of different areas of the district.		<ul style="list-style-type: none"> Sub division is necessary to protect the Green Belt if done sympathetically. 	Noted	None
P1_00154_Three Rivers Joint Residents Association	Not Stated	27. The Associations welcome the policy support for increased densities, but a clearer indication is needed as to where this would be appropriate. Using "character" as a reason is very bland – there could more specific references to such matters as the scale, massing, and bulk of buildings and their settings. The first part of Preferred Policy Option 6, sub-paragraphs (1) – (6), needs to be re-written, with supporting text, in the context of Chapter 12 of the NPPF 2021, the Building Better, Building Beautiful (BBBB) report, and the new National Model Design Code. The role of Neighbourhood Plans in delivering this policy should be acknowledged.		<ul style="list-style-type: none"> Agree with increased densities, but need to make clear where. More specific references to matters such as scale, massing and bulk of buildings and settings; Need supporting texts from NPPF and National Model Design Code; Role of Neighbourhood Plans should be acknowledged. 	Noted	None
P1_00155	Yes	I think it is good to include plans for longevity and changing requirements and the redevelopment of existing buildings as much as possible. Not just from an environmental but also aesthetics point of view, redeveloping existing buildings generally fits in with the character and look of the area rather than new builds.		<ul style="list-style-type: none"> Agree with approach. Good to include plans for longevity and changing requirements and redevelopment of existing buildings 	Noted	None
P1_00157	No	The policy does not make it clear where it would be applied. It would be more helpful if there were specific references to this, such as the scale of the building work		<ul style="list-style-type: none"> Policy should state where this is to be applied and have specific references to this. 	Noted	None
P1_00160	Not Stated	<p>FLATTED DEVELOPMENTS/BUILT FORM</p> <p>The draft plan states that "All proposals should be in keeping with the prevailing landscape/streetscape, reflecting the variety of local building types by using complementary building materials and designs, and should not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design."</p> <p>1) No criteria appear to be given to indicate what constitutes over development etc. This allows unscrupulous builders to profit at the expense of the residents and the local environment.</p> <p>2) The plan quantifies the maximum dwellings per core or storey, but makes no recommendation on the maximum number of storeys. Health and well-being is recognised as being very important when planning for future developments. Rickmansworth, its three district centres and the surrounding semi-rural communities which make up the Three Rivers Council boundary are quite unsuitable for high rise development. This is borne out by the appalling 23 storey development being built within Watford BC at Croxley on the boundary with TRDC. Irrespective of precedent elsewhere, I believe that 4 storeys should be the absolute maximum for well-being and neighbourly and community interaction, particularly outside Sustainability Zones 1 &2.</p> <p>In addition to earlier comments, I should like to add an additional criteria for new design and layout.</p> <p>In support of the environment and ecology, hedgehog highways need to be incorporated into landscaping of gardens and open spaces.</p>		<ul style="list-style-type: none"> No criteria have been given to indicate what overdevelopment is; Whilst plan quantifies maximum dwellings per core/ storey, does not specify maximum number of stories; Four stories should be maximum, particularly outside Sustainability Zones 1 and 2; New criterion needs to be added for new design and layout; Hedgehog highways need to be incorporated into landscaping of gardens and open spaces. 	Noted	None
P1_00162	Yes	Disabled people need to be included in housing decisions.		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00164	Yes	I assume 8 refers to the Parker Morris standards?		<ul style="list-style-type: none"> Does 8 refer to Parker Morris Standards? 	Noted	None
P1_00166	Yes	You should always reuse Brown belt first		<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00167	Not Stated	Page 33 – residential design. It would be preferable here to go much further in the description of the type of development that is suitable for the area. For example, the recent hotel and warehouse development adjacent to the Batchworth lock area is very poor indeed and does not fit the canal town aesthetic of Rickmansworth. Careful attention to design requirements within certain areas of Three Rivers would address this issue and mean that developers cannot just throw up cheap unsympathetic boxes which have recently tended to start to ruin the character of the town. As an additional remark here, I would point to the Ben Pentreath Truro developments which are completely visionary and pay strong attention to community, to the extent where the council and residents are positively enthusiastic. There is no reason why TRDC cannot follow this example – through the use of the local plan mechanism -and create beautiful new communities within the area, rather than allowing unscrupulous developers to gain at the expense of our communities .		<ul style="list-style-type: none"> Need to describe what type of development is suitable in the area; Example include development next to Batchworth lock area which is very poor; Careful attention to design requirements is needed; Ben Pentreath Truro developments are completely visionary and pay attention to community, to extent where the council and residents are positively enthusiastic. TRDC should replicate. 	Noted	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

P1_00168		Yes	Acceptable Policy	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00170		Yes	Chorleywood is not an area well served by public transport unless you are a commuter to Central London (see earlier comments), therefore I agree that tandem developments are not generally appropriate.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00174		Yes	Sounds Sensible	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00181		Not Specified	The proposed approach is acceptable, but it needs to be clarified under 4.68 what 'high quality' means and who is to judge and by what criteria, this is a very loose description. There will be a need for some accompanying design guidance. The Chilterns Design Guide provides guidance on good practice within the AONB.	<ul style="list-style-type: none"> Agree with approach, but under Para 4.68 clarify what 'high quality' means, needs to be accompanying design guidance. Chilterns Design Guide provides guidance on good practice. 	Noted	None
P1_00183		Yes	Summed up in plan	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00184		No	I consider the minimum standards for amenity space will lead to very cramped designs and are the absolute minimum that should be permitted. In particular the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7) I consider that a higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards.	<ul style="list-style-type: none"> Minimum amenity space standards will lead to very cramped conditions, are 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. 	Noted	None
P1_00186		No	This development will have a significant negative impact on the local infrastructure and environment	<ul style="list-style-type: none"> Development will have a negative impact on local infrastructure and environment. 	Noted	None
P1_00187		No	I consider the minimum standards for amenity space will lead to very cramped designs and are the absolute minimum that should be permitted. In particular the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7) I consider that a higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards.	<ul style="list-style-type: none"> Minimum amenity space standards will lead to very cramped conditions, are 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. 	Noted	None
P1_00190		Yes	A sensible approach	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00201		Yes	For me, it seems like the only way	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00204		Yes	It appears appropriate to the needs.	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00206		Yes	It is the correct approach to have this plan, but the building standards aren't enforced thoroughly enough. This is seen frequently on new builds that are building to a specified budget.	<ul style="list-style-type: none"> Agree with approach but building standards aren't enforced thoroughly enough. 	Noted	None
P1_00209		Yes	because it is in line with MHCLG guidelines/suggestions	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00211		No	A higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) or M4(3) standards. It is important that new development respect the existing character of neighbourhoods and the policies concerning sub-division of buildings	<ul style="list-style-type: none"> Higher percentage of new buildings with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards. New developments should respect the existing character of the area 	Noted	None
P1_00215		Yes	Whilst it may be the right approach. Is the plan a reality?? As a resident of a beautiful village all I see and hear about are consistent plans to build on green belt land. To expand our village but without thought to the underlying infrastructure or even whether it would change the character of our village. So you can say your plan is X. But in reality it could be seen to be words.	<ul style="list-style-type: none"> Agree with approach but concerns whether in reality this could be applied. 	Noted	None
P1_00218		Yes	Yes. No Comment	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00219		Yes	Appropriate standards met	<ul style="list-style-type: none"> Agree with approach 	Noted	None
P1_00220	P1_00220_Moor Park Residents Association		1. The Associations welcome the policy support for increased densities, but a clearer indication is needed as to where this would be appropriate. Using "character" as a reason is very bland – there could more specific references to such matters as the scale, massing, and bulk of buildings and their settings. The first part of Preferred Policy Option 6, sub-paragraphs (1) – (6), needs to be re-written, with supporting text, in the context of Chapter 12 of the NPPF 2021, the Building Better, Building Beautiful (BBBBC) report, and the new National Model Design Code. The role of Neighbourhood Plans in delivering this policy should be acknowledged.	<ul style="list-style-type: none"> First part of PPO 6, sub-paragraphs (1) – (6), needs to be re-written, with supporting text, in context of Chapter 12 of the NPPF 2021, Building Better, Building Beautiful (BBBBC) report, and the new National Model Design Code; Role of Neighbourhood Plans delivering this policy should be acknowledged. 	Noted	None
P1_00222_Three Rivers	Three Rivers Green Party	No	We consider that a higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) or M4(3) standards. We	<ul style="list-style-type: none"> Higher percentage of new buildings with at least 25% of new builds 	Noted	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

Green Party			stress the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7).	meeting either the Building Regulations M4(2) and M4(3) standards.		
P1_00223		Yes	It sounds like all things are covered but it needs to be followed through, we should not let badly designed, cheap housing to be build.	<ul style="list-style-type: none"> • Agree with approach but needs to be followed through 	Noted	None
P1_00224		Yes	up to a point.. see below	<ul style="list-style-type: none"> • Agree with approach 	Noted	
P1_00227		No	The minimum standards for amenity space will lead to very cramped designs and are the absolute minimum that should be permitted. In particular new development should respect the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7))	<ul style="list-style-type: none"> • Minimum amenity space standards will lead to very cramped conditions, are the absolute minimum; 	Noted	None
P1_00232		Yes	All Good	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00233		Yes	I have no objections to the Preferred Policy Option for Residential Design and Layout and Accessible and Adaptable Buildings.	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00234		Yes	I have no objections to the Preferred Policy Option for Residential Design and Layout and Accessible and Adaptable Buildings.	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00236		Yes	Stipulations make sense	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00240		Yes	Yes	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00244		Yes	Just a comment: Why are their HOMES and AFFORDABLE HOUSING? Do wealthier people live in homes and poorer people in housing?	<ul style="list-style-type: none"> • Agree with approach. Query why market housing is called 'Homes' yet affordable units are called 'Housing'? 	Noted	None
P1_00254_Planning Bureau Ltd	Planning Bureau Ltd	Not Stated	<p>The Council's commitment towards providing accessible and adaptable homes to support the changing needs of residents is commendable. Accordingly, there is a requirement for:</p> <ul style="list-style-type: none"> - 10% of all new developments of 50 dwellings or more to meet Part M4 Category 2: Accessible & Adaptable Dwellings of the Building Regulations. - 10% of affordable housing to meet Part M4 Category 3: Wheelchair User Dwellings of the Building Regulations. - All new dwellings to comply with the <i>Nationally Described Space Standards</i> unless a different approach is robustly justified <p>As referred to elsewhere in our representation, no Local Plan Viability Assessment has been published with the Regulation 18 consultation which in our view undermines the robustness of the consultation. It is unknown at the time of writing if the cost of providing electric vehicle charging points has been properly allowed for.</p> <p>We would respectfully remind the Council that the PPG states that "<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>" (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>We respectfully request that the additional costs associated with meeting the design requirements in <i>Preferred Policy Option 6</i> should be allowed for in the forthcoming Local Plan Viability Assessment.</p>	<ul style="list-style-type: none"> • General agreement with approach; • No Local Plan Viability Assessment, undermines robustness of the consultation, remind council of PPG reference on the matter; 	Noted	None
P1_00256		Yes	Seems reasonable	<ul style="list-style-type: none"> • Agree with approach 	Noted	None
P1_00261		No	Should have a reference to the need to provide a local design code. Appendix 1 is too vague.	<ul style="list-style-type: none"> • Should have reference to local design code; • Appendix 1 is too vague 	Noted	None
P1_00262		No	Every dwelling does not require amenity and parking space, these are desirable but not necessary, and these units could be rented or sold more cheaply. Quality of public transport must be considered when assessing road and parking requirements for example, just because a train service exists, it does not follow that the service is adequate or even serviceable. Attached properties do not need to be considered when deciding whether to allow development, however measures should be taken to ensure adjoined property's residents are not adversely affected - eg, acoustic resilient board to mitigate increased noise.	<ul style="list-style-type: none"> • Every unit does not require amenity/ parking spaces; • Quality of transport needs to be considered; • Need increased soundproofing for new semi-detached/ terraced properties 	Noted	None
P1_00265		Yes	As previously mentioned increased density needs to be managed carefully and the document needs to be written in a way that takes into account; scale, massing, and bulk of buildings and their settings	<ul style="list-style-type: none"> • Increased density needs to be managed carefully and take account of scale, massing and bulk of buildings. 	Noted	None
P1_00267		Yes	I don't know if this is the right approach - I have no idea what proportion of the local population might need accessible housing. It would help if there were a 'I don't know' response to these forms.	<ul style="list-style-type: none"> • Unsure, need a "Don't Know" option in the consultation. 	Noted	None
P1_00271		Yes	Seems sensible	<ul style="list-style-type: none"> • Agree with approach 	Noted	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

P1_0028 2		No		<ul style="list-style-type: none"> Do not agree with approach but no reason given 	Noted	None
P1_0028 7		Yes	No I think 10% is too low	<ul style="list-style-type: none"> 10% is too low 	Noted	None
P1_0029 3		No	There is no viability study to justify the requirement for internal and external space standards and the target for accessible / adaptable dwellings. Whilst we support the principle, it needs to be supported by sufficient evidence as required through Planning Practice Guidance Paragraph: 002 Reference ID: 56-002-20160519. In the absence of this evidence we object to this policy as currently worded. Please refer to the cover letter.	<ul style="list-style-type: none"> No viability study to justify internal and external space standards; Support principle but reference to PPG Paragraph 002 needs to be mentioned and therefore object 	Noted – A Viability study will accompany the later stages of the local plan.	None
P1_0030 1_Chilterns Conservation Board	Chilterns Conservation Board	Not Stated	Preferred Policy Option 6 on residential design etc could be enhanced with reference to the Chilterns Buildings Design Guide and other design advice published by the Chilterns Conservation Board. Our design guidance provides advice on how to design developments (including non-residential development) in ways that respond to the characteristics of the Chilterns AONB and its setting, but also has applicability to all areas within the Chilterns and Thames Valley National Character Areas as a result of their underlying geology. We suggest the addition of the following text after criterion 2 of PPO6, either continuing that paragraph or as a new criterion: Within the Chilterns Area of Outstanding Natural Beauty and its setting, development proposals must demonstrate how they have taken the character of the area into account, with reference to the Chilterns Buildings Design Guide and other guidance published by the Chilterns Conservation Board. The council recognises that the landscape characteristics and vernacular building styles of the district even outside of the AONB are compatible with those found across the Chilterns. While strict adherence to the advice outside of the AONB will not always be appropriate or necessary, the council recommends that consideration is given to the Chilterns Buildings Design Guide for any development proposals in the district. Further information about the Guidance can be found here: https://www.chilternsaonb.org/conservation-board/planning-development/buildings-designguidance.html . (Please note that our website is currently under review, so do check the latest address for this with us before publication).	<ul style="list-style-type: none"> Preferred Policy Option 6 should make reference to Chilterns Buildings Design Guide; Suggest additions to text. 	Noted	None

Q7. Should we have considered alternative options?						
SC_00 023_C roxley Green Parish Council	Croxley Green Parish Council		We consider that a higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) and M4(3) standards.	Noted.	Agreed. Amend policy to allow for 100% new builds to meet the Building regulation M4 (2) accessible and adaptable homes standard. Wheelchair housing will be provided in accordance with need as set out in the LHN Study.	Amend policy this has the benefit of ensuring more homes can be adapted to meet the lifetime needs of communities.
P1_00 002			Without the power of an adequate district plan and compulsory design criteria, the quality of the environment will not be improved for all. More work required here with quality documentation that is enforceable, nothing much has changed here since the RUDC bylaws on housing pre-war.	<ul style="list-style-type: none"> Without adequate plan and compulsory design criteria, will be no improvement to the environment 	Noted	None
P1_00 005		Yes	See my response above	<ul style="list-style-type: none"> Do not address environmental possibilities of new housing developments. Need to include provision of heat pumps and district level heating; Need to include provision for electric charging points 	Noted	None
P1_00 014		Yes	As before	<ul style="list-style-type: none"> Agree with approach. Ensure policy is implemented 	Noted	None
P1_00 017		Yes	See above	<ul style="list-style-type: none"> Need to specify minimum floorspace for the property 	Noted	None
P1_00 020		Yes	The council should also ensure that infrastructure to support any development is in place and does not destroy the existing recreational facilities like play grounds and golf courses.	<ul style="list-style-type: none"> Ensure infrastructure to support development is in place. 	Noted	None
P1_00 025		Yes	Less housing and lower % of high rise development	<ul style="list-style-type: none"> Less Housing and lower % of high rise development 	Noted	None
P1_00 040		Yes	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	None

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

					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".	
P1_00 041_D	Yes	Just to check that the chosen approach is definitely the most appropriate.	<ul style="list-style-type: none"> Check the chosen approach is the correct one 	Noted	None	
P1_00 055	Yes	Build some smaller houses.	<ul style="list-style-type: none"> Build smaller houses 	Noted		
P1_00 057	Yes	As above.	<ul style="list-style-type: none"> Will have an unacceptable impact on infrastructure 	Noted	None	
P1_00 068	Yes	This section attempts to be all things for all men (er hmm.... and women) it could be used to refuse everything or be a template to favour certain developers. Either way, it needs changing.	<ul style="list-style-type: none"> Could be used to refuse everything or a template to favour certain developers. 	Noted	None	
P1_00 080	Yes	Do not overcrowd as the infrastructure cannot take it	<ul style="list-style-type: none"> Do not overcrowd as infrastructure cannot cope. 	Noted	None	
P1_00 103	Yes	More green space and natural setting to protect the environment and the existing houses in the village from increased flood risk	<ul style="list-style-type: none"> Need more green space and a natural setting to protect the environment; Protect existing houses from increased flood risk. 	Noted	None	
P1_00 107	Yes	An understanding of what actually makes people happy, not just whether or not a plan or design is efficient. The effect on nature should also be taken into account, as well as heat island effect. Large developments will have an effect on local climate,	<ul style="list-style-type: none"> An understanding of what makes people happy; Effect on nature needs to be taken into account as well as heat island effect. 	Noted	None	
P1_00 114	Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None	
P1_00 116	Yes	In section 5 there should be a restriction regarding the closeness of the development to existing rights of way with a protected zone on either side of the right of way e.g. a public footpath.	<ul style="list-style-type: none"> Should be a restriction regarding closeness of development to existing rights of way. 	Noted	None	
P1_00 119	Yes	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.	None	
P1_00 131	Yes	See above	<ul style="list-style-type: none"> No mention of truly 'green' building initiatives e.g. electric car charging, high standards of insulation etc; Car parking standards are poor from recent development examples; No mention of high speed broadband. 	Noted	None	
P1_00 132	Yes	general use and limits placed on subdwelling etc	<ul style="list-style-type: none"> Place limits on use and limits on sub-dwelling. 	Noted	None	
P1_00 135	Yes	We stress the importance of new development respecting the existing character of neighbourhoods (policies at 5(f) and 6) and the policies concerning sub-division of buildings (at 7).	<ul style="list-style-type: none"> Stress importance of new development representing existing character and sub-division of buildings. 	Noted	None	

Appendix 2 – Schedule of Representations – Residential Design and Layout and Accessible and Adaptable Buildings

P1_00 142		Yes	come on..	<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 147		Yes	The council should be looking to set a standard for positive energy buildings that all developers adopt	<ul style="list-style-type: none"> Set a standard for positive energy buildings that all developers adopt. 	Noted	None
P1_00 170		Yes	Chorleywood is an area beset by hills therefore IMHO it is not the ideal choice of location for wheelchair users. Hence the consideration of a higher threshold of 100 dwellings for the provision of accessible and adaptable dwellings and wheelchair user dwellings should have been adopted.	<ul style="list-style-type: none"> Chorleywood not best location for wheelchair users due to topography; Higher consideration of 100 dwellings for M4(3) standard dwellings should be considered 	Noted	None
P1_00 224		Yes	as long as these new builds are built with sustainable and carbon neutral	<ul style="list-style-type: none"> As long as build with sustainable and carbon neutral. 	Noted	None
P1_00 227		Yes	A higher percentage of new buildings should be built to accessible standards with at least 25% of new builds meeting either the Building Regulations M4(2) or M4(3) standards.	<ul style="list-style-type: none"> Higher % of new buildings should be built with at least 25% meeting either M4(2) and M4(3) standards 	Noted	None
P1_00 240		Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 254	Planning Bureau Ltd	Not Stated	That a proportionate and appropriate cost is attributed towards the design and accessibility standards detailed in <i>Preferred Policy 6</i> in the forthcoming Local Plan Viability Study. That interested parties are given the opportunity to comment on the Local Plan Viability Study prior to the Regulation 19 Local Plan being published for consultation.	<ul style="list-style-type: none"> A proportionate cost is attributed towards the design and accessibility standards; Local Plan Viability Study prior to Reg 19 is published for consultation. 	Noted	None
P1_00 265		Yes	As previously mentioned increased density needs to be managed carefully and the document needs to be written in a way that takes into account; scale, massing, and bulk of buildings and their settings. As required there need to be different standards based on different areas within TRD	<ul style="list-style-type: none"> Increased density needs to be managed carefully and document needs to be written that takes account of building and their setting. 	Noted	None
P1_00 282		Yes		<ul style="list-style-type: none"> No alternatives suggested 	Noted	None
P1_00 287		Yes	A higher % would be better	<ul style="list-style-type: none"> Higher % would be better 	Noted	None
P1_00 293		Yes	Please see above and refer to the cover letter	<ul style="list-style-type: none"> No viability study to justify internal and external space standards; Support principle but reference to PPG Paragraph 002 needs to be mentioned and therefore object 	Noted – A Viability study will accompany the later stages of the local plan.	None