

Croxley Green Parish Council's response to Three Rivers District Council's Regulation 18 Consultation on PREFERRED POLICY OPTIONS

General concerns

Croxley Green Parish Council has concerns about three aspects of the Preferred Policy Options in the proposed Local Plan

STRATEGIC CONSIDERATIONS

The proposed policies and site allocations provide a useful framework for many aspects of development control. However, there is no overarching vision for the sustainable development of the district and the various settlements within it.

The Local Plan seems to be a collection of ad hoc responses to the various development pressures on the district rather than a strategic vision for sustainable development to meet the needs of the communities which make up Three Rivers.

Two particular examples:

- Proposals for the development or redevelopment of town and other local centres (such as Croxley Green) to meet the evolving needs of the community as the population grows
- Proposals for development to meet the health, social and educational needs of the communities over the next 30 years

ENVIRONMENTAL CONSIDERATIONS

The UN has identified three separate global crises facing humanity:

- Climate change
- Species extinction
- Waste disposal

The UK Government has set itself challenging targets. The Local Plan should reflect the scale of these problems and the changes needed to meet the targets and protect the planet, humanity, and the natural resources upon which we all ultimately depend.

Although there are many fine words within the proposed policies there seems to be an almost total lack of objective targets. Without targets to be achieved there will be little incentive for developers to make progress where there may be additional costs.

HOUSING MARKET

There are two fundamental problems within the UK housing market.

CGPC RESPONSE to TRDC on PREFERRED POLICY OPTIONS

One is that the demand for housing is a totally free market but the supply of land for housing is regulated through planning controls. Therefore the price of land (and of the buildings on it) reflects the scarcity of land for building in the places where people wish to live.

The other is that there are two different reasons for buying property. Some want to buy it for investment, others because they need somewhere to live. Over recent years the general economic trend has been for wealth to be accumulated by those owning assets rather than those in employment leading to inflation in asset values. In general, incomes have risen more slowly than house prices, pricing an increasing proportion of the population out of the possibility of home ownership.

The question of how these market distortions should be addressed to provide enough good quality affordable homes sustainably for the whole population goes well beyond the Local Plan.

No evidence has been presented that releasing more land for house building locally would change the relationship between local incomes and the local cost of housing in a way that meets the housing needs of the whole population.

PROFESSIONAL OPINION

Croxley Green Parish Council has contributed funding towards a professional opinion on the preferred policy options prepared by Jed Griffiths MA DipTP FRTPI. We endorse the statement prepared by him on behalf of Three Rivers Joint Residents' Association and Kings Langley and District Residents' Association and commend his comments to Three Rivers District Council.

A copy is attached and we make reference to specific points at places in our response.

Specific questions

Question 1

Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure (due to the constraints of the District), which means that the Council would not fully meet the residual housing target?

If no, please explain why.

Answer 1

NO.

Our attention has been drawn to apparent inconsistencies in Government policy. The Planning Practice Guidance (PPG) on Housing and Economic Needs Assessment appears to be either incomplete or outdated. It no longer aligns with more recent guidance and other policy requirements. It appears that Three Rivers District Council has based the approach in the draft Local Plan on the PPG and failed to take due account of evolving Government policy and more recent guidance.

Government policy and more recent guidance has placed a much stronger emphasis on the need to take account of local circumstances and protection of the Green Belt. It clearly states that Government policy allows for adjustment of the number of new dwellings required from the Housing and Economic Needs Assessment to allow for local circumstances and the protection of the Green Belt.

We refer, in particular, to a number of recent pronouncements:

- "Changes to the current planning system" (first issued on 16th December 2020, subsequently updated and reissued 1st April 2021)
- The Housing Minister's letter dated 29th March 2021 to Three Rivers District Council
- The National Planning Policy Framework, paragraph 11 and footnote 6

It appears to us that Three Rivers District Council has stuck to the outdated approach in Housing and Economic Needs Assessment and based the Local Plan on the PPG "*The standard method set out below identifies a minimum annual housing figure*" without going on to consider the local constraints including the extent of the Green Belt within Three Rivers. We believe that, in view of the constraints within the District, the District Council should challenge the Government's Standard Method more robustly and use up to date data to calculate the requirements, rather than basing the figure on historic information.

We believe that the decision to leave the European Union (Brexit) and the Covid19 pandemic have significantly changed the demand for housing and that due allowance should be made for these changes. Proximity to a wide range of employment has been a strong factor in the demand for housing around the London metropolitan fringe, including Three Rivers District. People desire to live within commuting distance of their places of work. One of the consequences of Brexit seems to be a translocation of employment from London to other European cities which may well reduce demand locally. The recent

pandemic has led to an acceleration of the trend for people to work from home or remotely from main offices, particularly in the knowledge based industries and it appears the change may cause permanent changes in the demand for housing in different parts of the country. If the need for regular commuting is reduced, this could have a substantial impact on the housing market, as lifestyle choices takes priority over commutability.

We believe that the price of housing has been distorted by the Government's quantitative easing response to the 2008 financial crisis and the 2019 pandemic and this is reflected in asset values, including house prices. The cost of homes now reflects an investment market price, rather than what people earning their living can afford. We believe the remedy lies in wider financial reform, rather than market led house building on protected Green Belt land.

There are a number of steps the Government could take to reduce the upward pressure on house prices, for example:

- Limiting ownership to people who have the right to live in the UK (to reduce foreign investment)
- Limiting ownership to companies based in the UK and controlled by interests based in the UK (to reduce secretive offshore ownership)
- To better and more effectively regulate the rental sector in the interests of renters and the population in general, rather than only the investors
- To encourage local authorities (and other public sector bodies) to invest in property for rental to those relying on benefits and reduce the overall cost to the taxpayer.

We draw attention to the comments prepared by Jed Griffiths in response to Question 1 and endorse his views.

In general Croxley Green Parish Council supports the need for more affordable housing within the district and, where possible and acceptable, within the parish area of Croxley Green.

We support the principle of the District Council's approach, but consider it does not go far enough. We are totally opposed to the use of the Government's Standard Methodology for calculating housing need in Three Rivers or in Croxley Green.

We note that the ONS projections for population and households show a continuing reduction in the rate of growth and consider that up to date figures should be used to estimate future housing needs.

We consider that trends underlying recent reduced ONS projections of population and households will continue and that the new standard method considerably over-estimates the underlying need for more dwellings in Three Rivers.

We consider that the District Council has given insufficient evidence for the reasons for reducing the residual housing number from 10,678 to 8,973 dwellings over the period 2018 to 2038.

We consider the dwelling requirement for the period could be reduced considerably

further. The recent National Census will provide further evidence of population change and the extent of the need for more dwellings. We consider the Local Plan should take these figures, when published, into account.

We believe that the District Council should carry out detailed reviews of what can be built within each settlement without causing harm or encroachment onto undeveloped Green Belt land.

We agree with the District Council that the Government's Standard Method for calculating the District's housing need is not appropriate in Three Rivers District.

We agree that a modified approach is required and we support the inclusion of:

- (a) Completions 2018 to 2020
- (b) Commitments (unimplemented planning permissions)
- (c) An allowance for windfall developments

Question 2

Do you think the Preferred Policy Option for meeting the Presumption in Favour of Sustainable Development is the right approach?

If not please identify how the option could be changed.

Should we have considered alternative options?

If yes, please explain.

Answer 2

NO.

Croxley Green Parish Council notes that policies 1(1) and 1(2) are general statements about the Council's intent as the local planning authority and support the approach.

However, policy 1(2) should not be applied to the extent that it overrides protection that neighbouring property owners can expect from other aspects of the NPPF.

Policy 1(3) sets out a number of requirements in general terms to contribute to the sustainability of the District. It includes a wide range of important aspirations, many warm words, and good intentions.

However, there are no standards or metrics by which any of these policies are to be judged or measured. The detail of how they are to be applied lies in the extent to which the rest of the proposed Local Plan develop the aspirations into practically applicable policies and how effectively they can be applied to individual development proposals to deliver the listed aspirations.

We have attempted to match the rest of the proposed policies in the Plan to the requirements identified in 3(a) and found that some of the requirements are not elaborated in individual policies or quantified elsewhere. As such we consider they will remain merely

as aspirations and be unenforceable.

In general we do not think the preferred policy option goes far enough. It is reactive and unambitious. Alternative options could be considered, with an indication of what a more ambitious policy could achieve.

The Strategic Objectives have omitted any holistic perspective on resilience in the built environment and in communities.

Climate change resilience: what will be done to reduce risks of overheating – threats to health, threats to productivity; risk of subsidence; other extreme weather events.

Shock events more generally (e.g. pandemic, attack, cyberattack, major incident):

- Are the health services still accessible?
- What happens when the M25 is closed and all Croyley/Watford roads are gridlocked?
- What studies have been done to provide evidence on the resilience of critical infrastructure and what planning needs to consider?
- At a specific level, overheating in homes is a growing risk, worsened with an ageing population who are more vulnerable to heat risks.
- What considerations will be taken to ensure the built environment protects residents rather than exacerbates the problem?

It omits the critical role of ecosystem services – we need increased vegetation to improve air quality, reduce flash flooding, reduce pollution in rain runoff, cool the streets in hot weather, and provide habitat for pollinators and their wider ecosystem. These are needed where people live – in gardens and streets, as well as larger areas in parks and woods

The visual amenity of our places have an impact on well-being. What are the ambitions for how our communities will look? The role of greener streets is missing here.

It is not sufficient to aim to reduce further impact on the environment – it is critical to plan to undo the damage already done which has resulted in devastating biodiversity loss and a climate that has already started changing. One area is front gardens: there has been extensive loss of vegetation over recent decades and this is continuing as fully-paved drives are permitted. This has led to biodiversity loss, increased risks of flooding, loss of visual amenity (with increasingly ugly urban settings which leads to poorer well-being), and increasing heat risk during heatwaves. A major factor driving the loss has been planning requirements for additional car parking per property when additional bedrooms are added. Loss of vegetation in back gardens has also increased. The Local Plan needs to include ambitions to recover from some of these losses.

We draw attention to the comments prepared by Jed Griffiths in response to Question 2 and endorse his views.

It may be helpful to order the strategic objectives in three groups:

- Environmental objectives
- Social objectives

- Economic objectives

And to link these more specifically to the policies in the document.

The overall policy does not recognise the need for additional infrastructure to support the level of development proposed and the constraints on providing it to meet the current and future needs within the District.

It should specifically reference the climate emergency and identify the policies required to deliver the actions to respond effectively.

There is no specific mention of the objectives of the Green Belt and other designated areas and we consider an additional policy objective could be inserted:

“To protect and enhance the Green Belt and rural areas and support farming, rural businesses, and countryside recreation.”

How does the Council intend to measure 3(a) and what targets specifically will it set for property developers? How will these be enforced if not delivered in accordance with approved plans?

At 3(b), will the use of separate sites to achieve sustainable drainage be allowed as part of development?

At 3(c), How will biodiversity on previously developed land be measured and how will developers be held to account to not reduce biodiversity metrics?

At 3(d), Whilst building at a higher density can be sustainable, where there are good transport links and access to nearby services, higher density development alters the character of the neighbourhood and generates a need for more public access open space and places for recreation and community activities. The key test will be “where appropriate” – no criteria have been proposed.

The aspiration at 3(e) is meaningless unless specific targets are set in preferred policy option 18 for places where defined building materials are found to be present at the site.

At 3(f), what specifically is the Council proposing to do to improve the diversity of wildlife and how will it measure achievement? Without specific measurements and targets this ‘policy’ is only aspiration.

Delivery of 3(g) comes through preferred policy options 2 and 4.

At 3(k), the council should act on the wishes of the community when protecting and enhancing existing community facilities, not simply deciding what it thinks is appropriate.

Although we support the approach in general, the reasons given for why this is the District Council’s preferred policy option sets out a range of priorities and good intentions without specific targets or proposals for how the priorities and good intentions are to be achieved.

Question 3

Do you think the Preferred Policy Option for Housing Mix & Type is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 3

NO

Design of the buildings in their setting is particularly important and this should support the approach in the Neighbourhood Plan to protect the character of the various areas in Croxley Green.

We draw attention to the comments in Jed Griffiths' statement and suggest the policy should be based on the most up to date data.

We have concerns that the balance of housing may not adequately reflect the changing needs of the community following Brexit and the pandemic. Progress towards these targets should be monitored and the figures should be kept under constant review.

Although we support the approach in general we consider any larger site (over 10 units) should be developed with a master plan approach.

Question 4

Do you think the Preferred Policy Option for Housing Density is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 4

NO

The proposed target of 50 dwellings per hectare is significantly different from the average density in the settled areas of Croxley Green (and elsewhere in Three Rivers). Housing density should reflect the density of the existing settlement pattern except where high quality dwellings can be provided at a higher density without damaging the character of the area.

We question whether the minimum amenity space standards in Appendix 1 – Design Guide can be achieved with the proposed target of 50 dwellings per hectare.

Should we have considered alternative options?

YES

Density targets should match patterns in existing settlements except where higher densities can be justified where there are good transport links and access to nearby services.

It should also be about provision of appropriate outdoor space for each dwelling to enable people to have access to such space – as proved vital during pandemic lockdowns.

Also to ensure appropriate provision for as much biodiversity and planting as possible, to help with carbon capture.

Residents should also be incentivised to grow more of their own food, to help with sustainability and in some cases with their cost of living.

Specific density targets should be set with no exceptions. Particularly without any transparent and measurable basis for which a higher density might be accepted.

The pandemic has caused a significant shift in the amount of time people are spending / working from home and there is evidence that this will continue to be the case in future with businesses looking to reduce expensive office accommodation footprint.

Lower density should be considered over historic statistics, given this shift.

Question 5

Do you think the Preferred Policy Option for Affordable Housing is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 5

NO

The words “affordable housing” are interpreted differently by policy makers and the general public. The Government definition is at odds with the public understanding of their meaning.

One consequence of the sale of publicly owned housing (“right to buy” legislation) has been continuing inflation in the cost of renting property.

Croxley Green Parish Council believes as much as possible social renting is needed to provide housing especially for young families who are from the area and want to live here.

We would like to see the policy include how the provision of affordable rent dwellings will be measured and how rental affordability of these dwellings be continued once they have been built.

By applying the same proportion for all developments from 1 additional home upwards, small developers are penalised and will go elsewhere. Contribution to affordable housing is essential but the contribution should be progressive, i.e. the contribution by larger developers should be larger. There should be a threshold for small developments to encourage development of smaller in-fill sites that can contribute to the overall numbers of new homes.

We believe there should be better provision for wheelchair users, to reflect the increasing

needs of an ageing population. At least 25% of affordable housing meeting the Building Regulations M4(3) standard.

We draw attention to the comments in Jed Griffiths' statement and endorse them.

The definition of "affordable" housing is somewhat meaningless in a high-cost area such as Three Rivers and there should be a more detailed statement of the need for social housing and starter homes.

With regards to the mode and delivery of affordable housing, there should be clear guidance on the size thresholds applicable to each type of site. Viability considerations should also be covered in the policy – the requirements should be based on an "open book" approach, with full publication of calculations of affordable housing on individual sites.

Question 6

Do you think the Preferred Policy Option for Provision for Gypsies, Travellers and Travelling Showpeople is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 6

YES.

No comment.

Question 7

Do you think the Preferred Policy Option for Residential Design and Layout and Accessible and Adaptable Buildings is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 7

NO

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)

We draw attention to the comments in Jed Griffiths' statement and endorse them.

Particularly 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.

Should we have considered alternative options?

YES

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.

Question 8

Do you think the Preferred Policy Option for Employment and Economic Development is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 8

NO

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.

Should we have considered alternative options?

YES

There should be a policy to encourage and support businesses carrying out maintenance, repair and refurbishment locally, to support the circular economy.

Question 9

Do you think the Preferred Policy Option for Warner Bros. Studios at Leavesden is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 9

NO COMMENT

Question 10

Do you think the Preferred Policy Option for Retail and Leisure is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 10

YES

No comment

Question 11

Do you think the Preferred Policy Option for Social and Community Facilities is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 11

NO

Croxley Green Parish Council believes that social and community facilities should be run as locally as possible, i.e. by Parish Councils, local associations or community groups wherever possible. Ownership should be passed to the local level from TRDC where appropriate.

In particular the proposed policy would support retaining the Red Cross Centre in Croxley Green as a community asset and community building, and we consider that the policy should be extended.

We draw the District Council's attention to the strength of feeling about the future of the Red Cross building and the support expressed through a local petition.

Question 12

Do you think the Preferred Policy Option for Health and Wellbeing is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 12

NO

The proposed policy 11(3) should apply to any development of more than 20 dwellings

Should we have considered alternative options?

YES

The current policy 11(2) is purely reactive; there should be a more proactive policy to secure suitable provision within the District. There is an urgent need to provide a suitable site (or sites) for new health care provision within Croxley Green.

The present health and medical facilities in Croxley Green are inadequate to meet the needs of the present population of Croxley Green. The Parish Council considers that providing better health facilities, in particular doctors' surgeries with the capacity to deliver a wide range of health services for the existing and projected population, should be the priority for development in Croxley Green before any more residential properties are built in the area.

We draw particular attention to the detailed response submitted by our local doctors' surgeries about the urgent need for both to have larger and more modern premises to be able to meet current demands and provide a wider range of services locally in line with changing NHS requirements.

Question 13

Do you think the Preferred Policy Option for Carbon Dioxide Emissions and On-site Renewable Energy is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 13

NO

It is inadequate in the face of the challenges of climate change.

Should we have considered alternative options?

YES

TRDC should set a much higher target for reducing carbon emissions than currently allowed under National Policy and challenge the Inspector and the Government to strike it out.

Croxley Green Parish Council considers that all new build should be required to meet zero carbon targets.

Adequate ventilation is required alongside energy efficiency. There is an existing and growing risk of older people and young children overheating in poorly designed and poorly ventilated homes.

Question 14

Do you think the Preferred Policy Option for Adapting to Climate Change and Sustainable Construction is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 14

NO

The policy only mentions major developments.

All development, including building extensions and adaptations, should be required to submit a Sustainability Statement demonstrating how sustainable design and construction methods have been used, and measures to enable the development to mitigate and adapt to climate change over its lifetime have been incorporated.

There should be a preference for using low embodied carbon materials. Also attention should be paid to the need to mitigate extreme weather, including excessive heat. Buildings should be designed to be kept cool by low carbon means such as shading and ventilation.

We support the approach in general.

Question 15

Do you think the Preferred Policy Option for Renewable and Low Carbon Energy Developments is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 15

NO

Croxley Green Parish Council considers the approach needs to be developed much further, with more specific and detailed targets, and become part of a fully sustainable strategy for any new residential or commercial developments.

However, we support the approach in general.

Question 16

Do you think the Preferred Policy Option for Flood Risk and Water Resources is the

right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 16

NO

Croxley Green Parish Council considers that NO residential development should be permitted in flood Zone 3 ANYWHERE In Three Rivers. Despite the sequential test approach, there is no need for further residential development in such areas within Three Rivers.

Any development that is permitted in the flood zones should be capable of surviving flooding with minimal damage and designed to provide as much flood detention and retention storage as possible.

There should be stronger guidance and control on any development, and particularly front gardens, to keep them as green as possible and ensure there is no surface water run-off from them.

We draw attention to the comments in Jed Griffiths' statement and endorse them.

In particular, the need to consider surface water flooding, in the context of climate change and the need for natural methods of flood control.

The importance of protecting water resources and water quality.

The importance of the three rivers and their tributaries as priority habitats and the need to improve their environmental quality by encouraging rewilding.

Otherwise, we support the approach in general.

Question 17

Do you think the Preferred Policy Option for Green Belt is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 17

NO

The Green Belt within Croxley Green and in the surrounding areas is one of the key features of the settlement and highly valued by most residents. The whole point of the Green Belt is that it is intended to be an enduring feature. Otherwise, the whole character of a place like Croxley Green will be totally changed.

Croxley Green Parish Council endorses the comments from Jed Griffiths' statement about not reiterating, and thereby slightly altering, the policies set out in the NPPF.

We suggest TRDC should stick to the clear policies in the NPPF and not change the designation of any land within the Green Belt, except in extreme cases or where slight amendment of the boundaries is locally acceptable and does not damage the integrity of the Green Belt.

In addition, we suggest there should be a presumption in favour of only using temporary buildings to meet any agricultural or forestry needs and a requirement to demolish and remove any such buildings or structures when the original purpose expires.

There should be a prohibition on converting such buildings to residential use with a legally enforceable covenant as well as conditions attached to any planning permission.

Question 18

Do you think the Preferred Policy Option for Ground Conditions, Contamination and Pollution is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 18

YES

No comment

Question 19

Do you think the Preferred Policy Option for Waste Management and Recycling is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 19

NO

Croxley Green Parish Council considers the policy should be extended to reduce waste and encourage recycling.

In particular, there should be a requirement on all commercial development to commit to phasing out single use, non-compostable materials, and to providing recycling facilities for their customers for all of their products and packaging.

Also a significant amount of demolition and construction waste arises from domestic extensions and adaptations. The policy should be extended to require the pre-sorting and recycling of such waste to minimise the amount going to landfill and the contamination of waste streams for reuse and recycling.

Otherwise we support the approach in general.

Question 20

Do you think the Preferred Policy Option for Green and Blue Infrastructure is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 20

NO

Croxley Green Parish Council considers there should be specific reference to the importance of retaining and improving smaller scale local features, such as road verges, street trees, front and back gardens, in creating local green corridors to encourage and support biodiversity.

We endorse the comments from Jed Griffiths' statement about the importance of the local chalk streams; the need to define "key assets"; the importance for preserving and enhancing connectivity between sites; and the need for wide buffer zones.

Otherwise we support the approach in general.

Question 21

Do you think the Preferred Policy Option for Landscape Character is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 21

NO

Croxley Green Parish Council considers there should be reference to the importance of local landscapes and explicit support of local landscape characteristics identified in Neighbourhood Plans.

Otherwise we support the approach in general.

Question 22

Do you think the Preferred Policy Option for Biodiversity, Trees, Woodlands and Landscaping is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 22

NO

Croxley Green Parish Council considers the suggestion that “*the need for the development would outweigh the need to safeguard the site*” is vague and easily open to abuse.

The suggestion of alternative wildlife habitat provision shows a fundamental misunderstanding of ecology. “Minimising adverse effects” is not protection. “Maintaining the level of biodiversity in the area” as some form of aggregate measure is meaningless.

Adequate protection requires that sites designated as important are not disturbed. Years/decades of ecological development cannot simply be moved or replaced.

Focusing on “species identified for retention” again shows a misunderstanding of ecology – a biodiverse location supports multiple species, many of which will not be identified/counted/placed on lists for retention. What is known of any location is at best a small sample of the life it supports.

The plan should state categorically that development will not be permitted in the listed areas under the Local Plan. This is the only way to protect the ecosystems that they support.

Where alternative wildlife habitat provision can be made in order to maintain local biodiversity; (3(b)) we suggest that provision of alternative sites should require a full EIA.

We note that the DEFRA Biodiversity Metric is listed as the means to quantify the value of biodiversity, but suggest it be could be specified as the most recent DEFRA Biodiversity Metric (currently 2.0).

We consider it is not acceptable to suggest that achievement of the biodiversity gain can be made at alternative local sites when it cannot be achieved at the site of the development. Even worse to propose that offset elsewhere nationally would be an acceptable remedy for destruction of biodiversity within Three Rivers.

We would like to see something more definitive than just 'seek' to retain existing trees etc. We would also like to see landscaping directed by those with appropriate and independent expertise to ensure use of suitable diverse species for each location.

The areas considered key for biodiversity should be more clearly specified, including use of maps / coordinates, perhaps by reference to other documents. Statements such as “*Whippendell Woods and surrounds*” are imprecise and too vague.

Question 23

Do you think the Preferred Policy Option for Open Space, Play Space, Sport and Recreation is the right approach? If not please identify how the option could be

changed.

Should we have considered alternative options? If yes, please explain.

Answer 23

NO

Croxley Green Parish Council considers this policy requires more detail.

In particular no recreation sites should be built on unless a locally acceptable alternative has been provided.

Otherwise we support the approach in general.

Question 24

Do you think the Preferred Policy Option for Local Distinctiveness and Place Shaping is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Question 24

NO

Croxley Green Parish Council considers the proposed policy seems to be focussed on new development. Extensions and adaptations, including those currently allowed as permitted development, can individually and cumulatively change the character of an area. The policy should be extended to include extensions and adaptations.

This policy should actively support any local character areas and especially those developed in Neighbourhood Plans.

While the wording appears appropriate, it is clear that this is insufficient. What will be done to prevent places like Croxley Green becoming characterless, bland and undifferentiated like so many other places in the UK? Creation of place should be central to Three Rivers planning. 'Respecting local distinctiveness' (4.2n) is reactive – the Local Plan should set out the ambition for ongoing creation of local character and differentiation between settlements.

We endorse the comments from Jed Griffiths' statement about local design guides and draw the Council's attention to the approach in the Croxley Green Neighbourhood Plan.

We support his suggestion for Local Design Guides produced in collaboration with other authorities.

We endorse his comments on the detailed schedule in Policy 23 at (7), (8), (9) & (10), (11) and (15).

Other comments on Appendix 1 Design Criteria are appended.

In particular we are concerned about the effect of ground floor extensions on neighbouring properties, especially in some of the more historic areas of development and in some of the more recent areas, both of which have higher housing densities and limited space for extending properties without adverse effects on neighbouring properties.

We consider Three Rivers District Council should provide a simple design guide for those planning to extend their properties, whether under permitted development rights or with planning permission, to encourage more sensitive and considerate design.

Question 25

Do you think the Preferred Policy Option for Advertisements is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 25

NO

Croxley Green Parish Council considers there should be a reference to locally relevant design guidance in Neighbourhood Plans.

Otherwise we support the general approach.

Question 26

Do you think the Preferred Policy Option for Heritage and the Historic Environment is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 26

NO

Croxley Green Parish Council suggests that public access to heritage buildings should be encouraged wherever possible.

We suggest that demolition should be specifically included to avoid any misunderstanding (although demolition is development, per se).

We endorse the comments from Jed Griffiths' statement about including the wording from the current Local Plan:

Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that:

- (a) *The structure to be demolished makes no contribution to the special character or appearance of the area, or;*
- (b) *It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or;*
- (c) *It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.*

The Council will not normally grant consent for the demolition of a building in a Conservation Area unless planning permission has been given for the redevelopment of the site.

We also endorse his comments about protecting the setting of a Conservation Area or listed building and commend his wording:

“Permission will not be granted for development outside or near to a Conservation Area if it adversely affects the setting, character, appearance, or public views into or out of that Conservation Area.”

We consider this should also apply to advertisement consents.

Otherwise we support the general approach.

Question 27

Do you think the Preferred Policy Option for Sustainable Transport and Travel is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 27

NO

Travel and transport are currently one of the major sources of carbon emissions. There will need to be a significant shift to sustainable forms of transport with more electric vehicles, including bicycles and scooters.

The policies to support sustainable transport and travel do not seem to address the scale of the changes that will be needed.

We suggest, in particular, further consideration of the following points:

- Provision of charging points for electric vehicles
- Support for hydrogen infrastructure when appropriate.
- Support for shared transport and shared car systems.
- Support for bus transport
- Protection of and promoting the Croxley Link corridor for sustainable modes.
- Working with others to make pedestrian crossing of roads safe and easy.

- Consider introducing 20mph zones in residential areas.

We endorse the comments from Jed Griffiths' statement about the importance of co-ordinating transport planning with the Local Plan.

In particular the need to define "acceptable walking distances" and "safe access routes" for pedestrians and cyclists.

And the need for Transport Assessments to consider the impact on the capacity of the local network to provide for all modes as well as the environment and public amenity.

Otherwise we support the general approach

Question 28

Do you think the Preferred Policy Option for Parking is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 28

NO

It is not clear whether "development" in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms.

Where the number of potentially usable bedrooms is increased the parking standards should apply, wherever possible, including the requirement to provide for electric vehicles and cycles.

Question 28a

Do you think the Preferred Policy Option for Parking Standards (Appendix 3) is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 28a

NO

Croxley Green Parish Council supports the requirements for active and passive provision for electric vehicles.

However, there should be greater consideration of the emerging needs for electric cycles, cycle trailers and cargo cycles and greater provision for all types of cycles in all settings, and particularly residential properties. Both the need for parking provision and for safe storage within the curtilage or nearby.

We suggest that there should be explicit consideration of the parking requirements for car clubs and rented vehicles, particularly for flats in class C3.

We note the comments from Jed Griffiths' statement about the difficulties of balancing the demand for car parking with support for sustainable transport.

In particular we suggest the minimum parking standards for the C3 use class could be increased to:

- 1 Bedroom, 1 space (full size)
- 2 or 3 bedrooms, 2 spaces (full size)
- 4 or more bedrooms, 3 spaces (full size) minimum

Question 29

Do you think the Preferred Policy Option for Deliveries, Servicing and Construction is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 29

YES

No comment

Question 30

Do you think the Preferred Policy Option for Waterways is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 30

NO

Our local rivers and waterways are at risk from climate change and from discharges whether consented or not.

The Local Plan should seek to improve their condition by protecting them from unauthorised and authorised discharges and encouraging "rewilding" developments to enhance diversity of natural habitats.

Otherwise we support the approach in general.

Question 31

Do you think the Preferred Policy Option for Broadband and Electronic Communications is the right approach? If not please identify how the option could be changed.

Should we have considered alternative options? If yes, please explain.

Answer 31

YES

No comment

COMMENTS ON APPENDIX 1 DESIGN CRITERIA

Design Criteria

In addition to the proposed Design Criteria, there should be specific reference to designs being in keeping with the character of the local area and respecting guidance contained within Neighbourhood Plans.

Privacy

No comment

Prospect

No comment

Daylight, Sunlight and Outlook

These considerations should also apply to the impact of any new development or redevelopment on neighbouring properties. Development should not be permitted that significantly reduces the daylight, sunlight or outlook of existing properties.

The 45 degree splay line currently only applies to two storey development. This should be amended to take into account the juxtaposition of neighbouring properties, different land levels, the position and orientation of windows and the potential impact of single storey extensions.

It is important that natural light is allowed to enter on the ground floor as well as the upper storeys. Current policies do not apply to ground floor and experience tells us this is an important consideration for local residents. The lack of policies for ground floor extensions in TRDC causes residents a lot of suffering in the longer term through reduction of natural light and sunlight. Croxley Green Parish Council suggests amendments such as:

“Overshadowing

The Council will consider the extent to which any proposal will affect natural light and sunlight to your neighbour’s property. This will include the size of your extension, how close it is to your neighbours’ windows or garden and the orientation of your house.”

“The 45 degree rule

In assessing extensions, the Council will use what is called the ‘45 degree rule’ as a guide in determining the acceptability of proposals. This rule is used to assess the impact on amenity of neighbours and considers the proposal in both plan and elevation. An extension should not exceed a line taken at 45 degrees from the edge of the nearest ground floor window of a habitable room in an adjoining property if the proposed extension is single storey. For extensions greater than one storey, the 45 degree line is taken from the centre of the nearest window of an adjoining property.”

Croxley Green Parish Council consider it is often inappropriate to infill a ‘L-shaped’ space between buildings as this can create a tunnel effect for the adjoining neighbour’s property. We consider greater consideration should be given to the effect on the neighbouring property.

Aspect

Flatted Developments

The Design Guide should also refer to providing adequate access for those with disabilities including limited mobility.

Residential Amenity Space

The Design Guide should also refer to ensuring that there is adequate access to amenity space for those with disabilities including limited mobility.

There is no definition of “open space”

There is no standard for the amenity space for a one-bed dwelling – we consider this should be the same as for a two bed dwelling, as a minimum.

Where there is land between the dwelling and the street we consider that at least a part should be retained as “green space” and planted and maintained appropriately. We suggest at least 25% or 33% of the area, to maintain the local character and to support some wildlife. This should apply both to new buildings and to the extension or conversion of existing properties.

Built Form

There should be specific reference here to the requirements set out in Neighbourhood Plans

Servicing and Ancillary Facilities

No comment