THREE RIVERS DISTRICT COUNCIL

Three Rivers House
Northway
Rickmansworth
Herts WD3 1RL

# POLICY AND RESOURCES COMMITTEE

## NOTICE AND AGENDA

For a meeting to be held in the Penn Chamber, Three Rivers House, Northway, Rickmansworth on Monday, 26 January 2026 at 7.00 pm

Members of the Policy and Resources Committee:-

Councillors:

Stephen Giles-Medhurst OBE (Chair)
Oliver Cooper
Stephen Cox
Steve Drury
Vicky Edwards
Rue Grewal
Philip Hearn
Sarah Nelmes (Vice-Chair)
Chris Lloyd
Chris Mitchell
Louise Price
Reena Ranger
Jon Tankard

*Joanne Wagstaffe, Chief Executive*
*Friday, 16 January 2026*

The Council welcomes contributions from members of the public on agenda items at the Policy and Resources Committee meetings. Details of the procedure are provided below:

For those wishing to speak:
Members of the public are entitled to register and identify which item(s) they wish to speak on from the published agenda for the meeting. Those who wish to register to speak are asked to register on the night of the meeting from 7pm. Please note that contributions will be limited to one person speaking for and one against each item for not more than three minutes.

In the event of registering your interest to speak on an agenda item but not taking up that right because the item is deferred, you will be given the right to speak on that item at the next meeting of the Committee.

Those wishing to observe the meeting are requested to arrive from 7pm.

In accordance with The Openness of Local Government Bodies Regulations 2014 any matters considered under Part I business only of the meeting may be filmed, recorded, photographed, broadcast or reported via social media by any person.

Recording and reporting the Council's meetings is subject to the law and it is the responsibility of those doing the recording and reporting to ensure compliance. This will include the Human Rights Act, the Data Protection Legislation and the laws of libel and defamation.

**19. REGULATION 19 SITE ALLOCATION** (Pages 3 - 2174)

That Members of the Policy & Resources Committee:

- Approve and recommend to Full Council the Local Plan Regulation 19 Part 2: Site Allocations document as set out in Appendix 1 for public consultation in accordance with the regulations and the Local Development Scheme
- Grant delegated authority to the Head of Planning Policy & Conservation and the Director of Finance in consultation with the Lead Member for the Local Plan to make any subsequent changes that are required before the documents are published for consultation
- Grant delegated authority to the Head of Planning Policy & Conservation and the Director of Finance in consultation with the Lead Member for the Local Plan to propose minor modifications to the Local Plan and submit the plan to the Planning Inspectorate for examination in public.
- Agree significant proposed modifications to the Local Plan be agreed by Urgent Decision under the council's constitution prior to submission to the Planning Inspectorate for examination in public.

**General Enquiries: Please contact the Committee Team at** committeeteam@threerivers.gov.uk

# Updates to the Local Plan due to Evidence Studies

This document lists the evidence studies (including second/third draft versions etc) that were received after the Local Plan was shared with Members for the Policy and Resources Committee and Full Council respectively and the potential required updates to the Plan (including planning policies and site allocations). Given committee lead-in times, it was not possible for officers to fully update the Plan in line with recommendations or findings from the studies before sharing the Plan (and associated appendices) with Members. Some drafts of the evidence studies were received prior to the Local Plan being shared with Members (which were fed into the Plan), so the later draft versions and any possible updates will be discussed within this document.

Officers have worked closely with the consultants preparing these studies and as such were aware that there were no 'show stopper' issues that would significantly change the planning policies or result in a change to the list of sites agreed at Local Plan Sub-Committee on 25 November 2025 and recommended to Policy & Resources Committee and Full Council for inclusion in the Regulation 19 Publication version of the Local Plan.

The Local Plan evidence base studies are technical documents commissioned to inform decision making during preparation of the Local Plan. They provide an objective assessment of key issues and help ensure that the policies and proposals within the local plan are justified, proportionate, and consistent with national planning policy. A robust evidence base is essential to demonstrate that the plan is sound.

These studies are typically prepared by independent consultants with specialist expertise, rather than by the local planning authority itself. This independence helps to ensure that the policy choices in the Local Plan are informed by impartial analysis.

Final versions of the evidence studies will be published on the council's website alongside Publication of the Local Plan during the Regulation 19 Consultation.

## Habitats Regulations Assessment – Appendix 10a

Purpose:

The purpose of a Habitats Regulations Assessment (HRA) is to determine whether the plan is compliant with the Habitats Regulations which affords protection to European sites (Special Protection Areas (SPAs) Special Areas of Conservation (SACs) and Ramsar Sites, and their interest or qualifying features. Simply, the HRA evaluates whether Local Plan policies and site allocations would have detrimental impacts on these protected sites.

Summary of Findings:

The initial "screening stage" found that recreational pressure (i.e damage and disturbance to habitats) arising from the site allocations within the Plan could lead to adverse effects on the Chilterns Beechwoods SAC. However, the second "appropriate assessment" stage found that mitigation is provided by the Local Plan policy *Chilterns Beechwoods SAC*. With this mitigation in place, it was determined that adverse effects on the integrity of the Chilterns Beechwoods SAC can be excluded, alone or in combination. Therefore, there was no need for the HRA to proceed to the following stage (Assessment of Alternatives).

Updates to the Local Plan:

None required.

**Health & Equalities Impact Report – Appendix 10b**

Purpose

The Health & Equalities Impact Report is a study combining a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA). An EqIA is a way of measuring the potential impact (positive, negative or neutral) that the Plan (i.e planning policies or site allocations) may have on different groups protected by equalities legislation, notably the Equalities Act 2010. A HIA is a means of measuring the potential health impacts of the Local Plan (i.e from planning policies and site allocations).

Summary of Findings:

The study assesses and discusses the health and equality impacts (beneficial; adverse; mixed; uncertain or neutral) of the different policy themes within the Plan. The report also recommends potential mitigation and enhancement to policy wording and site allocation wording.

Updates to the Local Plan:

Numerous policies or reasoned justifications will have minor amendments, however, it is not considered that any of the amendments to wording would be materially significant. Many of the recommendations are non-planning related and as such will not be included in the Local Plan.

**Landscape Sensitivity Assessment Addendum III (Appendix 10c) and Associated Scoresheet (Appendix 10d)**

Purpose

The purpose of a Landscape Sensitivity Assessment (LSA) is to assess the sensitivity of a site to built development by assessing its susceptibility to numerous landscape and visual variables. The 37 sites assessed were a combination of “NCFS” sites (submitted to the council in January 2025) and other sites which had not previously been subject to a Landscape Sensitivity Assessment. Sites located in urban locations were scoped out of the assessment.

Summary of Findings:

The LSA and associated scoresheet sets out the overall sensitivity to built development of the sites assessed. The scores ranged from low to medium-high. None of the sites allocated within the Local Plan scored higher than medium-high (one site).

Updates to the Local Plan:

The SHELAAs for all of the sites assessed will be updated to reflect the LSA sensitivity scores.

The site allocation policy (within the Local Plan) will be updated if an allocated site received an overall score of medium or higher, to require the submission of a Landscape and Visual Impact Assessment (LVIA) at planning application stage.

**Three Rivers Local Plan Viability Assessment – Appendix 10e**

Purpose

The Local Plan Viability Assessment assesses the financial viability of planning policies within the Plan individually and cumulatively, to ensure that future development can accommodate policies in the Plan.

Summary of Findings:

Some of the key policy themes assessed were affordable housing; BNG; accessibility; net zero; self/custom build and gypsy/traveller pitches.

In terms of affordable housing the report concludes "*we therefore recommend that the emerging target of 40% be adopted and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account. This reflects the council's current practice and the adopted Local Plan approach*". The testing of 50% provision for Green Belt sites indicated that the 50% figure would be viable on most sites coming forward.

In terms of the provision of affordable housing on small sites (primarily through financial contributions), the report finds that this requirement should be viable in almost all cases. In terms of implementation, the report sets out that the policy could be applied through a "*comparison of two residual valuations (one assuming all units are private and the other in which on-site affordable housing is included) with the financial contribution equating to the difference between the two residuals. Alternatively, a formulae-based approach could be used, the latter being simpler to implement*".

In terms of BNG, the report sets out that the 10% BNG provision has a "*relatively modest impact on residual land values and can therefore be viably absorbed alongside other policies*".

In terms of accessibility, the report sets out that the councils wheelchair and accessibility requirements "*has a relatively small impact on viability"*.

In terms of the net zero policies the report states that the consultants "*tested the impact that a net zero carbon standard is likely to have on developments in the district and the residual land values will typically fall by around 10% on average. The impact is therefore relatively significant in some cases, but the costs of technology required to achieve net zero carbon are expected to fall over time as research and development drives improvements*". Ultimately, no viability recommendations were made to dilute or amend the net zero policies.

In terms of self/custom build, the policy requirements have a "*broadly cost-neutral impact".*

In terms of the provision of gypsy and traveller pitches, the report concludes that strategic sites accommodating pitches for gypsies and travellers and travelling show people is "*unlikely to have a material effect on the viability of development*". The report goes on to say "*however, on sites which are being developed at high net to gross ratios, there will be less scope for provision of gypsy and traveller pitches*"

Updates to the Local Plan:

No updates required.

**Transport Assessment Technical Note 1 – Appendix 10f**

Purpose

The COMET transport model has been used to assess the impacts of the allocated development sites on the transport network (including public transport and highways). The Technical Note summarises the scenarios, assumptions and results of the initial transport modelling process and the impacts on the transport network.

Summary of Findings:

There is an overall increase in traffic flows on the highway network in Scenario 2 (commitments + allocated sites) compared to Scenario 1 (commitments only), due to the additional traffic generated by the allocations. These are generated across the whole district, with higher flows closest to the development sites.

On the M25, between Junction 18 and Junction 19, in the AM peak there is an increase in flow of 273 vehicles (3.6%) clockwise, and around 115 vehicles (2%) counterclockwise in the PM peak.

The difference in delays on the highway network between Scenario 2 and Scenario 1 are shown. The increases vary across the district from approximately 16 seconds to 1 minute 20 seconds.

There are some links and junctions that are forecast to have increased delay due to the Local Plan allocations. The increased delay is forecast to occur at the Denham Way / Chalfont Road / Maple Lodge Close junction, on the A41 Watford Road, Gallows Hill and Chequers Lane in Abbotts Langley, on Rickmansworth Road in Northwood, and on the M25 anticlockwise off-slip at Junction 18.

Overall, the modelling has indicated that the highway network within the district can accommodate the level of growth proposed in the Plan.

Updates to the Local Plan:

None required.

**Transport Assessment (Chapters 1, 2 & 3) – Appendix 10g**

Purpose

A Transport Assessment assesses the transport impacts of future development, identifies possible mitigation measures and assists in developing sustainable approaches to transport at a plan-making level. A Transport Assessment will:

- Summarise the relevant national, regional, and local transport policy;
- Describe the existing transport conditions by all modes of transport across the study area;
- Provide details of the Plan's development sites including their location, type and quantum of development and access;
- Describe the traffic modelling assessment that was undertaken and sets of the predicted impacts of the development sites;
- Provide details of the proposed mitigation measures to support the delivery of the development sites

Summary of Findings:

Only chapters 1, 2 and 3 are available to share currently. Chapter 1 provides an introduction to the Transport Assessment, chapter 2 provides a review of planning policy and chapter 3 describes the existing transport conditions by all modes of transport at a local and strategic level across the study area of the district.

The Transport Assessment (minus the mitigation measures) will be published alongside the Local Plan during the Regulation 19 consultation. The mitigation measures identified for specific sites will be dealt with at the examination stage (as was the case with the St Albans Local Plan).

Updates to the Local Plan:

None required (at this stage).

**Infrastructure Delivery Plan – Appendix 10h**

Purpose

The Infrastructure Delivery Plan (IDP) ensures that the Local Plan reflects an understanding of baseline infrastructure capacity and needs within Three Rivers and helps to ensure that the implications of future planned growth upon infrastructure are understood. It provides a general summary of the different types of future infrastructure investment that may be required, infrastructure implications of the allocated development sites and details on likely infrastructure costings, delivery mechanisms and prioritisation.

Summary of Findings:

The findings of earlier drafts of the IDP were incorporated into the Local Plan prior to being shared with Members. However, since the sharing of the Local Plan, a later draft was submitted to officers.

The main findings and recommendations from the later version (if new or amended compared to previous drafts) are set out in the “updates to the Local Plan section” below.

Updates to the Local Plan:

The following site allocation policies will be updated with the following amendments/ requirements:

**H38 – Land to the West and South of Maple Cross (formerly EOS12.2):**

- The number of childcare places required has been confirmed, which is 50.
- Nursery provision to be included in potential new primary school at Maple Cross (and potential expansion of Maple Cross JMI)
- The potential additional primary school will either take the form of a new primary school (3FE) or a new primary school (3FE) in addition to the expansion of Maple Cross JMI. This would need to include SEND places
- Clarification that 2 “settings” of extra care is required

**H41 – EOS7 - Land to the South of Shepherds Lane and east of M25**

- Clarification that 1 “setting” of extra care is required

**ED2 – Land Including and Adjoining The Reach Free School**

- Clarified that the expansion of the existing school could accommodate 4FE extension

**ED3 – Woodside Road**

- The number of childcare places required has been confirmed, which is 50.

**Green Belt Review – Appendix 10i**

Purpose:

The Stage 4 Green Belt Review was commissioned as a result of updated national policy and guidance. The first component of the review is the assessment of the council's previous Green Belt Reviews against the new policy and guidance to assess whether they are aligned and can continue to be relied upon going forward, or whether parcels require re-assessment.

One of the main purposes of the Stage 4 Green Belt Review is mapping out provisional grey belt. The word provisional has been used to emphasise that there still other factors to be considered prior to deciding whether land fully constitutes grey belt. The report includes a map that identifies provisional grey belt across the parcels that have been assessed at the settlement edge. Another important purpose of the Stage 4 Green Belt Review is to consider whether the alteration of Green Belt boundaries would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. The review identifies areas of the district where the Green Belt was performing a role of 'fundamental importance'.

In addition, the study reviews the previous washed over villages assessment to consider whether any changes to the recommendations are necessary in light of new policy and guidance.

Summary of Findings:

The updated draft Stage 4 Green Belt Review (2026) identifies provisional grey belt across the parcels that have been assessed at the settlement edge. Sites that fall outside the assessed areas would need to be considered on a case-by-case basis. The majority of these sites would be provisional grey belt as they would play a limited role in relation to towns and large built up areas. However, many of these sites would fall in unsustainable locations, and as such would not be brought forward even if considered provisionally grey belt.

The parcel level identification of grey belt is helpful at a strategic level for plan-making. However, when considering the identification of grey belt in decision making or for specific sites for allocation, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site. This means that development management and planning policy officers may need to make their own judgements where applications or potential sites only partially overlap with assessed parcels or only make up a smaller proportion of parcels. It should be noted that at a further level of granularity, assessments of sites' contribution to the Green Belt may yield differing results to those achieved by the relevant parcels in the Green Belt Review.

At Members' request, additional work has been undertaken assessing the impacts of physical features on the assessed parcels whether this would alter the findings in the previous draft version of the review. It is noted that many of the previous parcel assessments considered the impact of physical features though there have been some adjustments to the Green Belt Review where land previously assessed as Green Belt is now assessed as provisional grey belt. Most notably, the site between Abbots Langley (north of Abbots Road) and the M25 has

now been assessed as grey belt rather than Green Belt. This does not alter the council's position on the site (it is not included as a site allocation in the Regulation 19 plan) as it was not originally removed on purely Green Belt grounds.

When considering whether the releasing Green Belt would fundamentally undermine the purposes of the remaining Green Belt across the plan area, the review identifies areas of the district where the Green Belt is performing a role of 'fundamental importance'. These are areas that perform a strategically important role against the Green Belt purposes across the plan area. Green Belt does not necessarily need to perform strongly against all purposes to be considered fundamentally important to the Green Belt.

Seven broad areas of fundamental importance have been identified where future growth should be considered carefully, to ensure that it does not fundamentally undermine the purposes of the Green Belt across the plan area. Identification of an area of fundamental importance may not, however, mean that these areas cannot accommodate some development, and it is for the council to make a balanced planning judgement based on the scale and location of the proposed land for release. If the strategic role of an area of fundamental importance would still continue even if that development were to go ahead, then it is difficult to argue that that development would fundamentally undermine the purposes of the Green Belt.

Updates to the Local Plan:

None required.

**Sustainability Appraisal (SA) – Appendix 10j**

Purpose:

A Sustainability Appraisal (SA) is an iterative, evidence based and qualitative process that appraises the environmental, social and economic performance of the Local Plan against a set of sustainability objectives in order to identify, describe and evaluate the likely significant social, economic and environmental effects. Where appropriate, the SA highlights areas where measures to avoid, minimise or mitigate any potential negative effects could be required. Similarly, and where appropriate, opportunities to enhance the contribution that the Local Plan could make to sustainability are identified. The SA also reviews reasonable alternative approaches (for example to the growth strategy). The Local Plan has been subject to a Sustainability Appraisal (including working notes and addendums) at each stage of production (including during every public consultation). The SA also incorporates a Strategic Environmental Assessment (SEA).

Summary of Findings:

*Assessment of Reasonable Alternatives:*

The assessment of reasonable alternatives explains how different growth and spatial strategy options have been identified and tested through the Sustainability Appraisal (SA) to inform the Regulation 19 Local Plan. It sets out the legal and policy context for considering alternatives, reflects on how options have been explored at earlier plan-making stages, and summarises previous assessments. Overall, the SA process has been iterative, with evidence from earlier assessments helping to shape and refine the emerging plan and narrow down realistic alternatives.

The Local Plan is based on a housing target of 12,480 dwellings over the period 2026–2041, derived from the Government's Standard Method. After accounting for existing commitments and windfall development, a residual requirement of 10,226 dwellings remains. Extensive evidence gathering has been undertaken to address this need, including calls for sites, an Urban Capacity Study, Green Belt Reviews, and a Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA assessed 284 sites, all of which were subject to SA, distinguishing between sites outside the Green Belt and those within or partially within it. While some capacity exists outside the Green Belt, this is limited and leaves a substantial shortfall, meaning that Green Belt release has been considered unavoidable if housing needs are to be met.

At the Regulation 19 stage, three reasonable alternatives have been identified for assessment. These range from a preferred approach focusing development in the most sustainable locations with limited Green Belt release, through to options involving additional site allocations and progressively greater Green Belt release to meet more of the residual housing requirement. The SA findings indicate that higher levels of housing delivery are associated with increased effects overall: greater positive impacts in social and economic terms, but also increased negative effects on environmental objectives. The preferred spatial strategy has therefore been selected by weighing these trade-offs and seeking to balance meeting housing needs with minimising environmental harm, informed by the evidence base and SA conclusions.

*Assessment of Regulation 19 Local Plan Policies:*

The Sustainability Appraisal concludes that the Local Plan Vision is broadly compatible with the SA objectives, particularly in social and economic terms, as it seeks to meet the needs of the district's population while protecting local character. The Vision also aligns well with many environmental objectives through its emphasis on high-quality built and natural environments, climate-sensitive development, carbon reduction, and the transition to a zero-carbon future. However, some uncertainties are identified, reflecting the fact that delivering the required scale of development may have environmental impacts depending on its location, scale, and design. The SA notes that these potential tensions are addressed by other Strategic Objectives and policies within the Plan, which are intended to mitigate or minimise adverse effects arising from new development.

The Sustainability Appraisal finds that the Regulation 19 Local Plan policies perform very strongly overall, with significant positive effects identified against almost all of the fifteen SA objectives and minor positive effects recorded across the full framework. The only objectives where significant positive effects were not identified are soils and sustainable locations, reflecting more limited policy influence in these areas. While the overall picture is highly positive, the assessment also notes the potential for some minor negative effects, particularly in relation to flood risk, climate change, soils, and landscape and townscape, which are largely associated with the impacts of new development.

Significant positive environmental effects are identified across a wide range of objectives. The policies strongly support biodiversity through mandatory biodiversity net gain, protection and enhancement of designated and non-designated sites, and requirements for long-term stewardship of green and blue infrastructure. Positive effects are also identified for water resources, flood risk, air quality, and climate change, driven by policies that promote water efficiency, sustainable drainage, avoidance of high flood risk areas, low-carbon

development, and a shift towards sustainable transport and reduced car dependency. The conservation and enhancement of the historic environment, landscape, and townscape are also assessed as likely to benefit significantly from policy requirements that protect local character, heritage assets, valued landscapes, and high-quality design.

In social and economic terms, the policies are assessed as delivering significant positive effects for health and wellbeing, community cohesion, housing, sustainable prosperity, and employment and skills. This reflects strong policy support for open space, recreation and active travel, the protection and provision of community facilities, a diverse housing mix, and the safeguarding and growth of employment land in sustainable locations. Together, the SA concludes that the Regulation 19 policy framework provides a robust basis for delivering growth in a way that maximises social and economic benefits while seeking to avoid, minimise, and mitigate environmental harm.

*Assessment of Regulation 19 Local Plan Site Allocations:*

The Sustainability Appraisal site assessments across the district indicate that, for most settlements, the proposed site allocations are unlikely to give rise to significant positive or negative effects. Instead, the effects are generally minor and mixed, reflecting the relatively modest scale of development in many locations and the combination of brownfield and greenfield sites. Across settlements, minor positive effects are most commonly identified in relation to housing delivery, sustainable locations, health and wellbeing, community cohesion, and climate change, demonstrating the contribution of site allocations to meeting housing needs and supporting accessible, connected communities.

A small number of significant effects are identified where site scale or sensitivity is greater. In Maple Cross and Mill End, individual strategic sites are assessed as having significant positive effects on the housing objective due to their substantial contribution to overall housing supply. Conversely, a limited number of significant negative effects are identified where environmental constraints are pronounced, most notably in Chorleywood, where one site within the Chilterns National Landscape is assessed as having significant adverse landscape impacts, and in Rickmansworth, where a site located entirely within Flood Zones 2 and 3 is assessed as having a significant negative effect on flood risk.

More broadly, minor negative effects are identified across several settlements in relation to biodiversity, soils, landscape and townscape, flood risk, and the historic environment. These effects are typically associated with the loss of greenfield land, development in environmentally sensitive locations, or localised constraints such as floodplains and heritage assets. However, the absence of widespread significant negative effects suggests that, overall, the site selection process has sought to avoid the most constrained locations where possible. The SA concludes that, taken together, the proposed sites would support delivery of the Local Plan's objectives while keeping adverse environmental and sustainability effects largely at a manageable and localised level, subject to mitigation through policy and design.

<u>Updates to the Local Plan:</u>

None required

**Strategic Flood Risk Assessment (SFRA) Levels 1 and 2 – Appendix 10k**

Purpose:

This Strategic Flood Risk Assessment provides an update to the South West Hertfordshire Level 1 SFRA (2018), which was prepared for the LPAs of Dacorum Borough, St Albans City and District, Three Rivers District and Watford Borough.

This update was required due to numerous changes in policy and guidance in the intervening period. The updated Level 1 SFRA reflects the latest changes to the NPPF, PPG, flood risk guidance and new national flood risk mapping. The Level 2 SFRA applies the new guidance and policy to previously submitted and new sites at risk of flooding, in a detailed assessment.

The study provides useful information for partners, developers and planners on a range of flood risk related matters. These include various flood risk maps from a range of sources, guidance on matters including the application of the sequential test, surface water management/SuDS and flood warning and emergency planning and furthermore, site specific assessments of sites accompanied by mapping and individual reports for sites at risk of flooding.

Summary of Findings:

To avoid duplication, the main findings can be seen in the below section.

Updates to the Local Plan:

The supporting text to the flooding policy will be updated to refer to the 2026 version of the SFRA.

Additionally, the following changes will be made to Policy ENV1 (Flood Risk & Water Resources):

Addition of the following sentence to policy criterion 8 "…*particularly in the River Colne and Gade catchments, where the cumulative impact of development will have the highest overall impact on flood risk*"

New policy paragraph under criterion 8 with the following wording: "*Natural Flood Management is encouraged where locationally relevant or as an off-site measure for larger developments looking to reduce flood risk upstream, or as part of BNG. These can include offline storage areas, reconnection and restoration of functional floodplains and targeted woodland planting. An example of areas where this may work are areas that could facilitate works to allow the existing lake and pond system in the Colne Valley to store flood water*".

Expansion of paragraph 10.15 of the reasoned justification with the following wording: "*SuDS on smaller developments will help with mitigating the cumulative impact of flood risk, defined as a series of many smaller developments in a river catchment adding to overall run off if no measures are in place to reduce runoff*".

Creation of a new paragraph under paragraph 10.15 with the following wording:

"*Development can provide opportunities to work with natural processes to help reduce flood and erosion risk, benefit the natural environment and reduce costs of schemes. This is known as Natural Flood Management (NFM), a process whereby action is taken to mitigate*

*flood risk by protecting, restoring and emulating natural processes. This approach aims to reduce flow volumes and delay the arrival of peak flood flow downstream. Techniques include:*

• *Creation of offline storage areas.*

• *Re-meandering streams (creation of new meandering courses or reconnecting cut-off meanders to slow the flow of the river).*

• *Targeted woodland planting.*

• *Reconnection and restoration of functional floodplains*

• *De-culverting and naturalising watercourses*

• *Installation or retainment of large woody material in river channels.*

• *Improvements in management of soil and land use.*

• *Creation of rural and urban SuDS.*

*Some measures will be location specific and should be tailored to an areas needs, with reconnection and restoration of functional floodplains and the creation of offline storage areas more relevant to the lowland Colne areas in and around the lake system of Rickmansworth and further downstream and woodland planting and re-meandering of streams in the more rural upstream areas*".

The following site allocation policies (and SHELAAs) require updating with the following wording:

**H3 - Garages, Jacketts Field (formerly AB31)**

The council's SFRA (2026) has concluded that due to a quarter of the site being within the 'design' flood event for surface water (1% Annual Exceedance Probability (AEP) plus climate change) a Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. The FRA should demonstrate avoidance of the highest risk areas or flood resilience and resistance measures that need to demonstrate no increase in flood risk off site. If this cannot be achieved, given the size of the site, a small reduction in dwelling capacity may be required.

**H18 - Heath House, Rickmansworth Road (formerly ACFS1)**

The council's SFRA (2026) has concluded that arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard. Design and access arrangements will need to incorporate measures, so development and occupants are safe. This information will need to be submitted at the planning application (and preferably pre-application) stage.

**H48 - Andrew Leys Farm, Harefield Road (formerly ACFS10)**

The council's SFRA (2026) has concluded that development should be steered outside of the area of surface water flood risk in the eastern part of the site. Flood depths of between

1.2m and 2m metres are predicted within the eastern site boundary between the 3.33% and 0.1% flood events. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. Detailed surface water modelling will be required, building on the national broader scale mapping. This may reduce the extent and depth of surface water flood risk, however, it is still possible that a reduction in site capacity may be required following detailed modelling (as avoidance may be a more appropriate response to higher flood risk).

**H27 - Land at Croxley Station (formerly CFS20)**

The council's SFRA (2026) has concluded that development should be steered outside the areas of surface water flood risk on the site. Where this is not possible, flood resilience and resistance measures should be implemented. Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

**H47 - Affinity Water Depot, Church Street (formerly CFS60)**

The council's SFRA (2026) has concluded that the site is significantly impacted by fluvial flood risk, with the majority of the site in Flood Zone 3b. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. For the FRA, detailed site-specific hydraulic modelling will be required, building on the recent River Colne model and incorporating culvert and sluice blockage modelling, as well as groundwater monitoring, due to the shallow groundwater in the area, for example.

To ensure safe access and egress during the 1% AEP fluvial and surface water flood events, works outside of the boundary of the site may be required. Subsequently, early discussions will be required with relevant bodies.

The SFRA advises that the site will only be appropriate for the reuse/conversion of existing buildings, or the redevelopment of buildings on the same footprint and that any development should only have commercial uses on the ground floor, given the high flood risk across most of the site.

**H28 - Cinnamond House (formerly CFS61)**

The council's SFRA (2026) has concluded that the site is at significant surface water flood risk. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. Future proposals will need to carefully consider this risk and demonstrate users of the site can be kept safe during the lifetime of the development through a detailed site-specific FRA including detailed surface water modelling. Development should be steered away from the areas identified to be at highest risk of surface water flooding within the site.

Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard.

**H29 - Garages off Grove Crescent, Croxley Green (formerly CG47)**

The council's SFRA (2026) has concluded that almost a quarter of the site at risk of flooding in the 100 year plus climate change flood event. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. Flooding potential is mainly on the access road, so safe access will need to be demonstrated in the FRA, without increasing flood risk elsewhere.

**H51 - Stockers Farm Road Depot (formerly H22a)**

The council's SFRA (2026) has concluded that there is significant risk of surface and fluvial flooding, with the majority of the site at risk in both surface water and fluvial design flood events, so development will need to avoid the higher risk areas and provide resilience and mitigation in the lower flood risk areas. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

Safe access and egress is not possible in the design flood event, so a flood warning and evacuation plan must be prepared to assess how residents can be safely evacuated or shelter safely on site. It is possible that given the size of the site and extent of flood risk , that site capacity may need to be reduced following a detailed FRA, that should include more detailed surface water and fluvial modelling.

**H24 - Chorleywood Library (formerly NCFS15)**

The council's SFRA (2026) has concluded that development should be steered away from areas of significant surface water flooding and groundwater monitoring is suggested to determine emergence risk. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

Safe access may not be possible during the 1% AEP plus climate change event, which must be considered during the site-specific FRA.

**H56 - Pinewood Lodge (formerly NCS34)**

The council's SFRA (2026) has concluded that development should be steered outside the areas of surface water flood risk on the site. Where this is not possible, flood resilience and resistance measures can be implemented. However, this will not be appropriate in the area of deep ponding in the south of the site, unless works can be undertaken that do not increase flood risk elsewhere.

Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

**H33 - Land at Mill Place (formerly NSS10)**

The council's SFRA (2026) has concluded that development should be steered away from the areas of highest surface water flood risk in the 100 year plus climate change flooding event. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

This page is intentionally left blank

# Three Rivers Local Plan

## Habitats Regulations Assessment

### Three Rivers District Council

Three Rivers House, Northway, Rickmansworth, Herts WD3 1RL

Prepared by:

**SLR Consulting Limited**

4 Park Square, Thorncliffe Park, Chapeltown,
Sheffield, S35 2PH

SLR Project No.: 430.000113.00001

16 January 2026

Revision: 1

## Revision Record

| Revision | Date | Prepared By | Checked By | Authorised By |
|---|---|---|---|---|
| 1 | 16 January 2026 | CB/KW | LM | VP |

# Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Three Rivers District Council (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

# Executive Summary

This report presents the Habitats Regulations Assessment (HRA) of the Three Rivers Local Plan in relation to listed and proposed European sites (e.g. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), Ramsar sites, and any sites required to compensate for adverse effects on such sites.

The HRA was undertaken between October 2025 and January 2026 to determine whether Likely Significant Effects (LSEs) on relevant European and Ramsar sites and their qualifying features can be excluded.

This HRA screening considers the following sites:

- Aston Rowant SAC;
- Burnham Beeches SAC;
- Chilterns Beechwoods SAC;
- Lee Valley SPA;
- Lee Valley Ramsar;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA;
- Windsor forest and Great Park SAC; and
- Wormley-Hoddesdonpark Woods SAC.

The HRA identified potential impact pathways from sixteen housing sites which could lead to LSEs in relation to physical damage or degradation of habitats and increased disturbance on one European site, Chilterns Beechwoods SAC.

Therefore, the next stage of the HRA, Stage 2: Appropriate Assessment, has been undertaken. The Appropriate Assessment found that adverse effects on the integrity of any European and Ramsar site alone or in combination arising from physical damage, degradation of habitats and increased disturbance could be excluded as a result of mitigation provided by Local Plan policy *Chiltern Beechwoods SAC*. This policy is considered sufficient to mitigate against the deterioration the Chilterns Beechwoods SAC.

# Table of Contents

**1.0 Introduction ..... 1**
1.1 Background ..... 1
1.2 Three Rivers District Local Plan ..... 1
1.3 Habitats Regulations Assessment ..... 1
**2.0 Methodology ..... 3**
2.1 Relevant Legislation, Policy, Case Law and Guidance ..... 3
2.2 The HRA Process ..... 3
2.2.1 Stage 1: Screening ..... 4
**3.0 Stage 1: Screening ..... 7**
3.1 Step 1 ..... 7
3.2 Step 2 ..... 7
3.3 Step 3 ..... 8
3.4 Step 4 ..... 10
3.4.1 Screening of Policies ..... 10
3.4.2 Assessment of Housing Site Options ..... 16
3.4.3 Assessment of Employment Site Options ..... 19
3.5 Screening Findings ..... 20
3.6 Screening Conclusions ..... 20
**4.0 Appropriate Assessment ..... 21**
4.1 Introduction ..... 21
4.1.1 Physical damage or degradation of habitats and increased disturbance ..... 21
4.1.2 Potential Effect Alone ..... 21
4.2 Conclusion ..... 23

# Tables in Text

Table 2-1: Screening Criteria ..... 5
Table 3-1: Potential Impacts ..... 7
Table 3-2: HRA Pre-Screening of TRDLP Policies ..... 11
Table 4-1: Housing site options and proposed number of dwellings ..... 22

# Appendices

**Appendix A Relevant Legislation, Policy, Case Law and Guidance**

A.1 Legislaion

A.1.1 The Habitats Regulations

A.1.2 The Environment Act (2021)

A.2 Policy

A.2.1 National Planning Policy Framework (2024)

A.3 Case Law

A.3.1 C-323/17 People Over Wind

A.3.2 C-164/17 Grace and Sweetman

A.3.3 C-293/17 and C-294/17 Dutch Nitrogen cases

A.3.4 C-461/17 Holohan v An Bord Pleanála

A.3.5 EWHC 351 Wealden District Council v Secretary of State for Communities And Local Government & Ors 2017 (Admin)

A.4 Guidance

A.4.1 Managing Natura 2000 Sites – the Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (2018)

A.4.2 Government guidance – Appropriate assessment: Guidance on the use of Habitats Regulations Assessment (2019)

A.4.3 European Commission guidance – Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021)

A.4.4 Assessment of plans and projects in relation to Natura 2000 sites (2022)

A.4.5 Government guidance – Habitats regulations assessments: Protecting a European site (2023)

A.4.6 Government guidance – Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (2024)

A.4.7 The Habitats Regulations Assessments Handbook (2024)

**Appendix B Information on European and Ramsar Sites**

B.1 European and Ramsar Sites within 20 km of the TRDLP Boundary

B.2 European and Ramsar Sites more than 20 km from the TRDLP Boundary

# Acronyms and Abbreviations

| | |
|---|---|
| AA | Appropriate Assessment |
| BNG | Biodiversity Net Gain |
| DLHHV | Designed Landscapes of High Historic Value |
| EEC | European Economic Community |
| HRA | Habitats Regulations Assessment |
| INNS | Invasive Non-Native Species |
| IROPI | Imperative Reasons of Overriding Public Interest |
| LNRS | Local Nature Recovery Strategy |
| LSE | Likely Significant Effect |
| SA | Sustainability Appraisal |
| SAC | Special Area of Conservation |
| SEA | Strategic Environmental Assessment |
| SPA | Special Protection Area |
| SLR | SLR Consulting Limited |
| ZoI | Zone of Influence |

# 1.0 Introduction

## 1.1 Background

SLR Consulting Limited (SLR) has been commissioned by Three Rivers District Council (TRDC) to prepare a Habitats Regulations Assessment (HRA) report in support of the Three Rivers District Local Plan (TRDLP). This report presents the findings from the TRDLP HRA Stage 1 Screening and the Stage 2 Appropriate Assessment.

## 1.2 Three Rivers District Local Plan

TRDC is preparing a Local Plan for the district, to manage the future development and growth of the district between 2024 and 2041. This is intended to replace the previous Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013), and the Site Allocations Local Development Document (adopted on 2014). It will also reflect relevant legislative requirements, as well as those of the National Planning Policy Framework (NPPF) [1] and National Planning Practice Guidance (NPPG).

The draft TRDLP is the Regulation 19 draft version and was subject to HRA Screening between October 2025 and January 2026. The draft TRDLP contains proposed policies and site allocation, and the findings are presented within this report.

## 1.3 Habitats Regulations Assessment

The purpose of the HRA is to determine whether the plan, in this case the TRDLP, is compliant with the Habitats Regulations. HRA findings feed into the parallel Sustainability Appraisal (SA) which incorporates Strategic Environmental Assessment (SEA), an integral part of the plan preparation process.

The Habitats Regulations afford protection to European sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)) and their interest or qualifying features, with Part 6 setting out the requirements for screening assessments, the circumstances under which an AA is required and the further implementation of Article 6(3) and 6(4) of the Habitats Directive.

The requirement for an Appropriate Assessment (AA) is set out within Article 6 of the Habitats Directive 92/43/ European Economic Community (EEC) of 21 May 1992 (as amended) on the conservation of natural habitats and of wild fauna and flora, which was most recently transposed into British law by the Conservation of Habitats & Species Regulations 2017 (as amended), also known as the 'Habitats Regulations'.

The UK left the European Union on the 31st January 2020, followed by Completion Day on 31st December 2020. The EU Exit Regulations (2019) establish any EU Exit-related changes to the Habitats Regulations (2017), with these considered to have no material implications on the requirement or process for a HRA of a plan. After Brexit, UK sites designated under the Habitats Regulations became part of the National Site Network (as defined in the interpretation sections of the Habitat Regulations (2017)), with a focus on maintaining ecological coherence throughout the UK.

In addition to the Habitats Regulations, UK Government policy (Office of the Deputy Prime Minister Circular 06/2005) states that internationally important wetlands designated under

[1] Department for Levelling Up, Housing & Communities (2024) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Accessed: 20/12/25].

the Convention on Wetlands 1971, called the Ramsar Convention (Ramsar sites) are afforded the same protection as SPAs and SACs for the purpose of considering development proposals that may affect them.

The Government also affords the same level of policy protection to potential SPAs, possible SACs and proposed Ramsar sites and to sites identified, or required, as compensatory measures for adverse effects on any of the above sites, through planning policy such as the NPPF.

# 2.0 Methodology

## 2.1 Relevant Legislation, Policy, Case Law and Guidance

Legislation, policies, case law and guidance relevant to the plan-level HRA of the new TRDLP are provided in further detail in Appendix A, including references. A summary is outlined below:

Legislation

- The Habitats Regulations; and
- The Environment Act (2021).

Policy

- National Planning Policy Framework (2024).

Case Law

- C-323/17 People Over Wind;
- C-164/17 Grace and Sweetman;
- C-293/17 and C-294/17 Dutch Nitrogen cases;
- C-461/17 Holohan v An Bord Pleanála; and
- EWHC 351 Wealden District Council v Secretary of State for Communities and Local Government & Ors 2017 (Admin).

Guidance

- Managing Natura 2000 Sites – the Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (2018);
- Government guidance – Appropriate assessment: Guidance on the use of Habitats Regulations Assessment (2019);
- European Commission guidance – Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021);
- Assessment of plans and projects in relation to Natura 2000 sites (2022);
- Government guidance – Habitats regulations assessments: Protecting a European site (2023);
- Government guidance – Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (2024); and
- The Habitats Regulations Assessments Handbook (2024).

## 2.2 The HRA Process

The methodology used in this report is based on and in accordance with the UK Government[2] guidance (Appendix A.4.3). The new TRDLP is a plan, rather than a project, and the HRA shall follow the four stages outlined below. The stages may not all need completing, depending on decisions at each stage.

[2] Organisations involved in producing this UK government guidance include the Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, and Natural Resources Wales.

- **Stage 1: Screening** – the process that determines whether the Plan is directly connected with or necessary for the conservation management of a European or Ramsar site and, if not, whether all Likely Significant Effects (LSEs) upon European and Ramsar sites of the Plan, either alone or in-combination with other projects or plans, can be objectively excluded (without considering mitigation) and therefore whether Stage 2 is required;
- **Stage 2: AA** – the consideration of effects on the integrity of the European or Ramsar sites of the Plan, either alone or in-combination with other projects or plans, in respect of the listed or proposed European or Ramsar sites' structure and function and its conservation objectives. Additionally, where adverse effects on site integrity are identified, an assessment of the potential mitigation of those effects is undertaken. The assessment of the effect on integrity of the site is undertaken including the effect of such mitigation;
- **Stage 3: Assessment of Alternative Solutions** – the process which examines alternative ways of achieving the objectives of the project or plan that might avoid or reduce the adverse effects on the integrity of the European or Ramsar sites; and
- **Stage 4: Imperative Reasons of Overriding Public Interest (IROPI) and Compensatory Measures** – the assessment where no alternative solutions exist and where adverse effects on the integrity of the European or Ramsar sites remain, IROPI has been identified. If it is deemed that the project or plan should be allowed to proceed, compensatory measures are identified, secured and their effectiveness ascertained.

### 2.2.1 Stage 1: Screening

Stage 1: Screening will follow the European Commission guidance (A.4.3), and the four steps outlined below.

**Step 1**: Ascertain whether the Plan is directly connected with, or necessary to, the management of a listed or proposed European or Ramsar site – to determine if it contributes to achieving the site's conservation objectives.

**Step 2**: Description of the Plan and its impact factors – appropriate details about the activities carried out within the Plan will be considered and key parameters of the Plan will be identified, such as:

- size (e.g. in relation to direct land-take);
- overall affected area including the area affected by indirect impacts (e.g. noise, turbidity, vibrations);
- physical changes in the environment (e.g. modification of riverbeds or morphology of other water bodies, changes in the density of forest cover);
- changes in the intensity of an existing pressure (e.g. increase in noise, pollution or traffic);
- resource requirements (e.g. water abstraction, mineral extraction);
- emissions (e.g. nitrogen deposition) and waste (and whether they are disposed of on land, water or in the air);
- transportation requirements (e.g. access roads);
- duration of construction, operation, decommissioning, etc.;
- temporal aspects (timing of the different stages of a plan or project);

- distance from listed or proposed European and Ramsar sites and in particular from their designating features; and
- cumulative impacts with other projects and plans.

**Step 3**: Identify which listed or proposed European and Ramsar sites may be affected by the Plan – all aspects of the Plan that could have potential effects on the sites through potential impact pathways will be considered. This will take account of the sites, their qualifying features and their Conservation Objectives (COs).

**Step 4**: Assess whether LSEs can be ruled out in view of the site's COs – the potential impacts identified will be assessed in terms of their likelihood and significance. Policies and sites will be screened out where there is no pathway for impact, or a pathway is so weak that there is no possibility for significant effects, either alone or in-combination.

Screening of the TRDLP policies will use the following criteria from the Habitats Regulations Assessments Handbook outlined in Appendix A (A.4.7)

**Table 2-1: Screening Criteria**

| Screening Category | Description | Screening Outcome |
|---|---|---|
| A | General statement of policy/general aspiration | Screen out |
| B | Policy listing general criteria for testing the acceptability/sustainability of proposals | Screen out |
| C | Proposal referred to but not proposed by the plan | Screen out |
| D | General plan-wide environmental protection/ site safeguarding/ threshold polices | Screen out |
| E | Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects | Screen out |
| F | Policy that cannot lead to development or other change | Screen out |
| G | Policy or proposal that could not have any conceivable effect on a listed or proposed European or Ramsar site | Screen out |
| H | Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects) | Screen out |
| I | Policy or proposal which may have a likely significant effect on a listed or proposed European or Ramsar site alone | Screen in |
| J | Policy or proposal with an effect on a listed or proposed European or Ramsar site but unlikely to be significant alone, so need to check for likely significant effects in-combination | Dependent on in-combination test |
| K | Policy or proposal unlikely to have a significant effect either alone or in-combination | Screen out after the in-combination test |
| L | Policy or proposal which might be likely to have significant effect in-combination | Screen in after the in-combination test |
| M | Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on an international nature conservation site | Screen in |

There are no COs for Ramsar sites, instead those for overlapping SACs and SPAs will be considered (in particular, where the qualifying features are the same). In the absence of any proxy COs, it will be assumed that the objective is to ensure the habitat types, or habitats of species significantly present on the site do not deteriorate below the current level (at the time of the assessment) and that the species are not significantly disturbed.

The in-combination assessment will consider the cumulative impacts of all the policies within the TRDLP as well as with other plans and projects. The plans considered for in-combination effects initially include the neighbouring authorities' local plans, as listed below, which also cover the extent of potential impacts that may arise from the TRDLP policies:

- Dacorum Borough Council Local Plan[3];
- St Albans City & District Local Plan[4];
- Hertsmere Borough Council Local Plan[5];
- Watford Borough Council Local Plan[6];
- Buckinghamshire Local Plan[7];
- London Borough of Hillingdon Local Plan[8];
- London Borough of Harrow Local Plan[9];
- Greater London Plan (London Plan)[10];
- Hertfordshire Minerals Local Plan[11];
- Hertfordshire Waste Local Plan[12]; and
- Buckinghamshire Minerals and Waste Local Plan[13].

[3] Dacorum Borough Council (2025) Dacorum Local Plan. Available at: https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan [Accessed 15/01/2026]

[4] St Albans City and District Council (2024) New Local Plan. Available at: https://www.stalbans.gov.uk/new-local-plan [Accessed 15/01/2026]

[5] Hertsmere Borough Council (2025) Hertsmere Local Plan. Available at: https://www.hertsmere.gov.uk/planning-building-control/planning-policy/hertsmere-local-plan [Accessed 15/01/2026]

[6] Watford Borough Council (2021) Watford Local Plan. Available at: https://www.watford.gov.uk/planning-policy-local-plan-1/watford-local-plan [Accessed 15/01/2026]

[7] Buckinghamshire Council (2025) The Local Plan for Buckinghamshire. Available at: https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-planning/buckinghamshire-local-plan/ [Accessed 15/01/2026]

[8] Hillingdon Council (2020) Local Plan. Available at: https://www.hillingdon.gov.uk/local-plan-and-review [Accessed 15/01/2026]

[9] London Borough of Harrow (2025) New Local Plan. Available at: https://www.harrow.gov.uk/planning-developments/new-local-plan-consultation [Accessed 15/01/2026]

[10] Greater London Authority (2021) The London Plan 2021. Available at: https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021 [Accessed 15/01/2026]

[11] Hertfordshire County Council (2007) Adopted Minerals Local Plan. Available at: https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/minerals-planning/minerals-planning.aspx [Accessed 15/01/2026]

[12] Hertfordshire County Council (2014) Adopted Waste Local Plan. Available at: https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/waste-planning/waste-planning.aspx [Accessed 15/01/2026]

[13] Buckinghamshire Council (2019) Minerals and Waste Plan Available at: https://www.buckinghamshire.gov.uk/planning-and-building-control/building-or-improving-your-property/minerals-and-waste/ [Accessed 15/01/2026]

# 3.0 Stage 1: Screening

## 3.1 Step 1

The TRDLP is not directly connected with or necessary to the management of any listed or proposed European and Ramsar sites; therefore, Stage 1: Screening must be undertaken following Steps 2 to 4.

## 3.2 Step 2

The TRDLP sets out the spatial strategy for development across Three Rivers, indicating where different types of development should be located within the district. The Plan will form the blueprint for how the council will deliver sustainable development in the district up to 2041, including managing needs for housing, jobs and supporting infrastructure – for example, shops, community facilities, transport, open spaces, schools and healthcare. The plan will be used to determine planning applications within the district and also show developers where land is available. The TRDLP consists of written policies (listed in Table 3-2) and supporting information, together with a map.

There is potential for the TRDLP to lead to expansion of the urban area for housing and employment, which could result in impacts within the TRDLP boundary as well as outside of this district. Potential impacts that are to be considered as part of the screening are listed in Table 3-1 as these may lead to adverse effects on the integrity of listed or proposed European and Ramsar sites and their qualifying features. There are no listed or proposed European and Ramsar sites located within the TRDLP boundary. The nearest European sites are located 8 km to the west of the TRDLP boundary and the next nearest Ramsar site is located 14 km to the south west of the TRDLP boundary (Appendix B).

**Table 3-1: Potential Impacts**

| Potential Impacts | Description |
|---|---|
| Habitat loss | A direct loss of habitat within the boundaries of a listed or proposed European or Ramsar site itself. This would also include the loss of Functionally Linked Land (FLL), which affects the abilities of the listed or proposed European or Ramsar sites' qualifying species to utilise the habitat and move between it. |
| Habitat isolation | Development or activities resulting in a separation of existing habitats. |
| Physical damage or degradation of habitats | Direct damage to sites such as through fire, vandalism, littering, trampling, grazing and erosion by people using the listed or proposed European and Ramsar sites recreationally. |
| Increased disturbance | Impacts on sight or sound that result in a change in behaviour of species from usual routines. Can occur from sources such as traffic, construction, or recreation. |
| Reduced mobility or migration of species | Habitat loss and increased disturbance could reduce the ability for mobile and migratory species to travel. |
| Spread of Invasive Non-Native Species (INNS) or undesirable species | Introduction or spread of species which can result in negative impacts to native species / habitats through direct competition or spread of disease. This can lead to simplification of and / or loss of qualifying species within listed or proposed European and Ramsar sites. |
| Hydrological changes | Impacts to water levels or flows through direct or indirect impacts can negatively affect habitats and species through a reduction or increase in availability of water. Can occur from drainage changes or abstraction. |

| Potential Impacts | Description |
|---|---|
| Turbidity and siltation | Introduction of particulate matter into watercourses can reduce the ability of plants or animals to access light or create a reduction in water levels. Can occur from surface run-off from impermeable surfaces or exposed land during construction. |
| Pollution (aerial or waterborne) | Activities which introduce harmful compounds into natural environments, such as ammonia from fertiliser or sulphurous oxides from vehicle emissions. This also includes nitrate or phosphate pollution to watercourses, which may result from diffuse pollution or discharges from wastewater treatment works. These can negatively impact qualifying habitats and species of listed or proposed European and Ramsar sites. |

## 3.3 Step 3

The following sites were identified with potential impact pathways due to the impacts listed in Table 3-1. These were derived from an initial 20 km buffer, which was then extended to 27 km to include additional sites as a result of potential recreational pathways. Other impacts are not anticipated for these sites as they are located within separate hydrological catchments and no further impact pathways exist at these distances as a result of the TRDLP. The following European and Ramsar sites were included:

- Aston Rowant SAC;
- Burnham Beeches SAC;
- Chilterns Beechwoods SAC;
- Lee Valley SPA;
- Lee Valley Ramsar;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA;
- Windsor forest and Great Park SAC; and
- Wormley-Hoddesdonpark Woods SAC.

The locations of these European and Ramsar sites are shown in **Figure 3-1**.

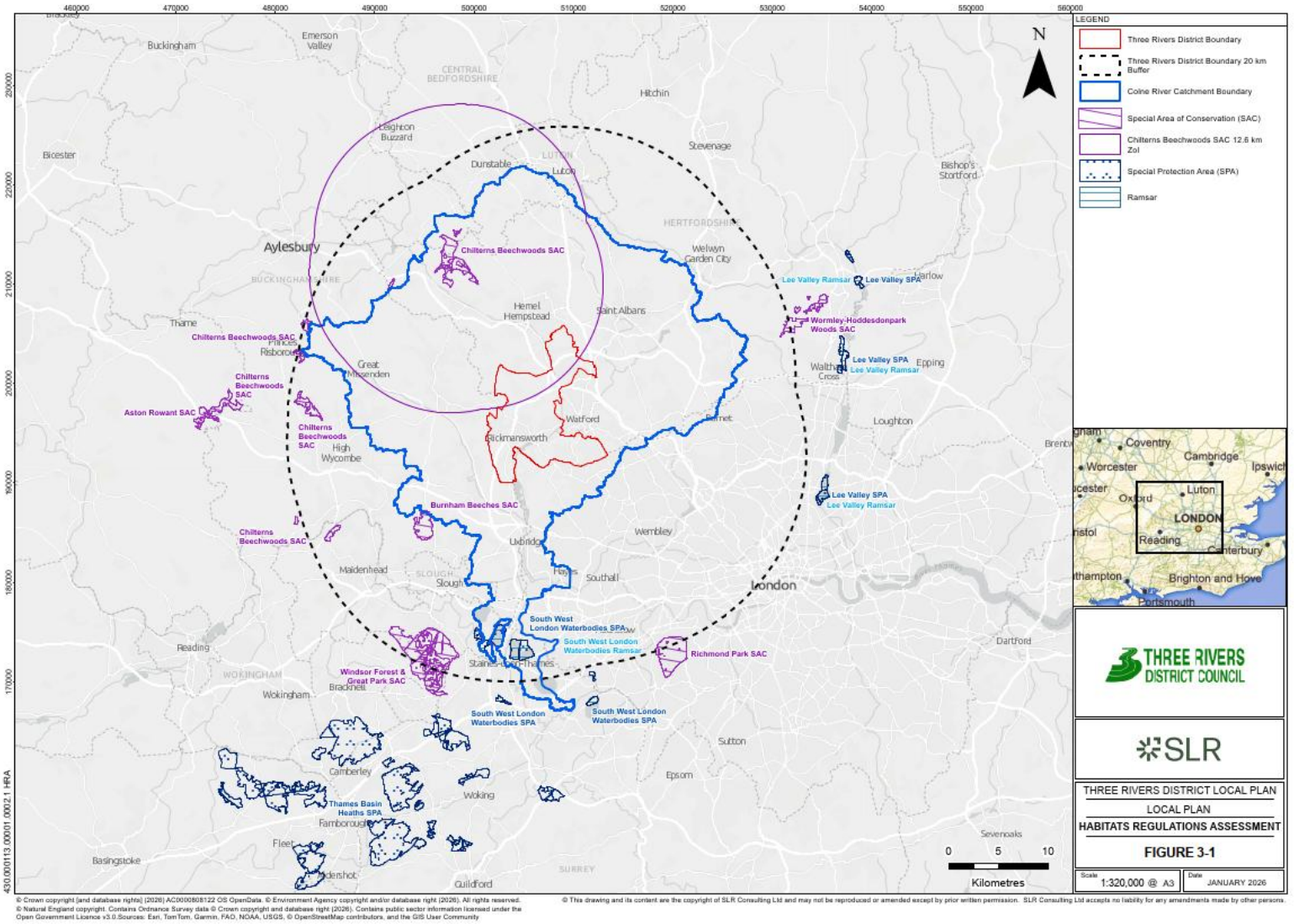



**Figure 3-1: European and Ramsar sites within 20 km from Three Rivers District Local Plan Boundary**

## 3.4 Step 4

### 3.4.1 Screening of Policies

Chapter 1 of the TRDLP is screened out as this contains administrative text to introduce the Plan. Chapter 2 is also screened out as this refers to the overall vision and strategic priorities of the Plan, setting out the general aspiration, with subsequent policies providing specific details for assessment.

The potential effects on these European and Ramsar sites as a result of the TRDLP policies are outlined in Table 3-2. The screening categories used within this table follow the descriptions and criteria outlined in Table 2-1. Green indicates that the policy can be screened out, with red indicating that the policy must be screened in and taken forward for further assessment of the effects on site integrity.

**Table 3-2: HRA Pre-Screening of TRDLP Policies**

| Policy | Policy Summary | Assessment of LSE alone | In-combination assessment | Pre-screening category and outcome |
|---|---|---|---|---|
| **Chapter 3 – Spatial Strategy** | | | | |
| Advertisements | This policy seeks to ensure advertisements are appropriately sited and designed to protect amenity, public safety, and local character, avoiding clutter, light pollution, and impacts on heritage, wildlife, and highways. | The policy outlines general criteria for the design and siting of advertisements and shop fronts, therefore there are no foreseeable pathways to LSE on European and Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Affordable Housing | Requires all new housing developments to provide affordable housing (40% overall, higher in Green Belt), sets tenure mix, and supports rural exception sites for 100% affordable housing. | This policy outlines sets out a requirement for affordable housing provision. The policy will not lead to an increase in the number of dwellings, rather it sets out the type and tenure mix within developments. As a result, the policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | G - Policy or proposal that could not have any conceivable effect on a listed or proposed European or Ramsar site<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Biodiversity | Requires all qualifying development to deliver at least 10% Biodiversity Net Gain (BNG), follow the mitigation hierarchy, protect designated sites (including SACs, SPAs, Ramsar), and enhance connectivity via Local Nature Recovery Strategy. | The policy aims to protect and enhance biodiversity across the District. The policy seeks to protect European and Ramsar sites. There are no foreseeable pathways to LSE on European and Ramsar sites. | N/A – no pathways identified | E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Broadband and Electronic Communications | Supports reliable, high-quality broadband and electronic communications, sets design/siting criteria for equipment, and requires new development to be capable of super-fast full-fibre connection prior to occupation. | The policy outlines general criteria for the design, siting, and delivery of telecommunications and broadband infrastructure, therefore there are no foreseeable pathways to LSE on European and Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Chilterns Beechwoods SAC | Requires HRA for residential development within the Chilterns Beechwoods SAC Zone of Influence (ZoI) where proposals result in a net increase of 100+ units. Mandates mitigation/avoidance measures for recreational disturbance, including provision or funding of Suitable Alternative Natural Greenspace (SANG) in line with the latest Mitigation Strategy. | This policy seeks to reduce recreational pressure on the Chilterns Beechwoods SAC. Residential development is permitted within the ZOI for the SAC, however it is limited to 100 dwellings per proposal before the developer is required to include mitigation measures. It is considered that the policy will sufficiently mitigate any potential increase in recreation arising from development within the ZOI, therefore no LSEs on the Chilterns Beechwoods SAC have been identified. | N/A – no pathways identified | D - General plan-wide environmental protection/ site safeguarding/ threshold polices<br>E - Policies or proposals which steer change in such a way as to protect international nature conservation sites from adverse effects<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Deliveries Servicing and Construction | Requires Construction Management Plans and Delivery/Servicing Plans to manage traffic, amenity, and operational impacts during construction and occupation. | The policy outlines general criteria for managing construction and servicing. There are no foreseeable pathways to LSE on European and Ramsar sites due to the distance from the TRLP boundary to these sites, and the lack of hydrological connectivity between the TRLP area to European and Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |

| Policy | Policy Summary | Assessment of LSE alone | In-combination assessment | Pre-screening category and outcome |
|---|---|---|---|---|
| Design Criteria | Provides detailed guidance for residential and non-residential development on privacy, amenity space, built form, outlook, daylight, and extensions. Seeks to ensure high-quality design and protection of local character. | The policy outlines general standards for new residential development to ensure high-quality design which is in keeping with the local character. There are no foreseeable pathways to LSE on European and Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Development in the Green Belt | Sets criteria for agricultural/forestry dwellings, extensions, replacement buildings, conversions, ancillary buildings, and changes of use in the Green Belt. Emphasises preserving openness and preventing inappropriate development. | This is a general policy which outlines criteria for development within the Green Belt. Residential development may be permitted where it is required to enable agricultural or forestry workers to live in the immediate vicinity of their place of work.<br>Residential development is permitted within the Chilterns Beechwoods SAC without mitigation if the proposal is for less than 100 dwellings. Should residential development be permitted in the Green Belt, it would be for less than 100 dwellings. As a result, there are no feasible recreational pathways to the Chilterns Beechwoods SAC resulting from this policy.<br>The TRDLP boundary is not within the catchment which could lead to LSEs on any European/ Ramsar sites, therefore there are no feasible hydrological pathways resulting from this policy. | N/A – no pathways identified | K – Policy or proposal unlikely to have a significant effect either alone or in-combination.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Employment and Economic Development | Seeks to facilitate economic growth by promoting office, industrial, warehousing, creative industries (including Leavesden Studios), and mixed-use development. Supports intensification within designated employment areas and allows redevelopment outside these areas subject to criteria. | The policy outlines the allocation of land for new employment developments. Development of employment areas may lead to impacts arising from construction, however, European and Ramsar sites are sufficiently distanced from the TRDLP boundary, and not hydrologically connected to any European or Ramsar sites. As a result, The policy could not lead to any LSEs on European/ Ramsar sites. | N/A – no pathways identified. | A – General statement of policy/general aspiration<br>B – Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination |
| Flood Risk and Water Resources | Requires development to avoid flood risk, apply sequential and exception tests, integrate SuDS, maintain riparian buffers, and protect/enhance water quality and resources. Sets water efficiency standards and wastewater infrastructure requirements. | The policy outlines criteria to manage flood risk and water quality, including the use of nature-based solutions which should reduce the impact of flooding. Any development of infrastructure as a result of this policy would not result in LSEs on European/Ramsar sites because there are no waterways within the TRDC boundary which are hydrologically connected to European/Ramsar sites. | N/A – no pathways identified | E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| SP3 - Infrastructure Delivery | Requires all development to provide the infrastructure necessary to support its impacts. New growth must mitigate environmental, and community impacts. Infrastructure may be delivered on-site, off-site, or through proportional financial contributions, with cross-developer cooperation expected where strategic infrastructure is required. This policy ensures alignment with the Infrastructure Delivery Plan which requires a phased delivery of infrastructure. | The policy required development to provide the necessary infrastructure to support residents. The development of new infrastructure will occur alongside new residential development and will not lead to an increase in the number of residents in the District. This policy will not lead to increased recreation at European and Ramsar Sites, and there are no hydrological pathways identified. Therefore, this policy could not lead to any LSEs on European/ Ramsar sites. | N/A – no pathways identified. | A – General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination |
| Local Distinctiveness and Place Shaping | Requires all new development to achieve high-quality design that respects local character, enhances distinctiveness, and integrates landscaping and public realm improvements. Encourages efficient land use and higher density in sustainable locations while safeguarding amenity and biodiversity. | A general policy which supports high-quality design. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |

| Policy | Policy Summary | Assessment of LSE alone | In-combination assessment | Pre-screening category and outcome |
|---|---|---|---|---|
| Northwood Headquarters | Supports new development at Northwood HQ to enhance/sustain operational capability; supports redevelopment/ conversion/ change of use of redundant MOD sites/buildings; resists non-military or non-defence development within/around the HQ where it would adversely affect military operations unless impacts can be mitigated or the site is no longer needed for defence. | The policy supports the redevelopment within the existing MOD estate, which will not include residential development. Any construction would be contained on a previously developed site. The site is located within the TRDLP boundary, to the southeast. The site is not located within close proximity to any European or Ramsar sites. The site is not within any catchments which includes European/Ramsar sites? As a result, the policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | K – Policy or proposal unlikely to have a significant effect either alone or in-combination.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Open Space, Play Space, Sport and Recreation | Safeguards existing open spaces and recreation facilities, sets criteria for loss or replacement, and requires new provision in major residential developments. Encourages high-quality, multifunctional design and biodiversity enhancement. | The policy outlines general criteria for protecting and providing open space and supports the enhancement of biodiversity and multifunctional design. New or enhanced open space for recreation may contribute to reducing recreational impacts to nearby European and Ramsar sites, in particular the Chilterns Beechwoods SAC. | N/A – no pathways identified | E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Overarching policy on sustainable development | Sets out the presumption in favour of sustainable development and requires all proposals to address climate change, efficient land use, biodiversity net gain, flood risk, infrastructure, and design quality. It is a high-level strategic policy guiding all development. | A general policy which supports sustainable development within the district. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| SP1 - Overall Levels of Growth | Sets a housing requirement of 413 dwellings per year (6,200 over 15 years). Directs delivery to the most sustainable locations in line with the spatial strategy, and safeguards existing employment sites. It requires the council to monitor housing delivery and infrastructure capacity, with the potential for review where additional sustainable growth could be accommodated without unacceptable harm to the Green Belt. | A policy which sets out the annual and future housing growth targets. This policy could be a driver for potential effects on the Chilterns Beechwoods SAC; however, the implications are more clearly assessed under the housing site options. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Parking Standards | Sets detailed standards for parking across all vehicle types and use classes. | The policy provides technical standards for parking provision. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out**: LSEs can be objectively excluded for this policy alone and in-combination. |
| Parking | Requires development to provide parking in line with standards, manage on-site spaces, integrate parking into design, include landscaping, and provide EV charging points. Encourages car clubs and sustainable transport measures. | The policy sets design and management standards for parking provision. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Policy XA | Requires all new dwellings (C3 and C4) to achieve high energy efficiency standards, prohibit fossil fuels, provide on-site renewable energy generation to match predicted energy use, and offset any shortfall via financial contributions. Includes requirements for smart energy systems, post-occupancy monitoring, and performance gap reduction. | The policy is focused on energy performance and carbon reduction. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Policy XB | Requires all new non-residential buildings to achieve net zero operational carbon through energy efficiency improvements, prohibition of fossil fuels, on-site renewable energy generation, and offsetting where necessary. Includes smart energy systems and post-occupancy monitoring. | The policy focuses on energy performance and carbon reduction for non-residential development. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |

| Policy | Policy Summary | Assessment of LSE alone | In-combination assessment | Pre-screening category and outcome |
|---|---|---|---|---|
| Policy XC | Requires all development to mitigate and adapt to climate change through sustainable design and construction principles, BREEAM standards for large non-residential schemes, cooling hierarchy, overheating assessments, water conservation, and resilience measures (e.g., SuDS, green/blue infrastructure). | The policy focuses on design quality, energy efficiency, and climate resilience. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Policy XD | Requires major developments to complete whole-life carbon assessments, limit embodied carbon, design for material reuse and disassembly, and conduct demolition audits. Smaller developments must provide a narrative on measures to minimise embodied carbon. | The policy focuses on reducing carbon emissions and waste through sustainable construction practices. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Policy XE | Supports retrofit-first approach to improve energy efficiency and reduce carbon emissions in existing buildings. Encourages fabric upgrades, low/zero-carbon heating, renewable energy, and sensitive retrofitting of heritage assets. Requires feasibility assessments for demolition and whole-life carbon assessments for major schemes. | The policy promotes sustainability and retrofitting of buildings. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Provision for Gypsies, Travellers and Travelling Showpeople | A policy which outlines how the Council will meet the identified need for 37 pitches for Gypsies and Travellers and 6 plots for Travelling Showpeople through a criteria-based approach. Criteria include avoiding flood risk areas, avoiding adverse impacts on wildlife, heritage, and landscape, and ensuring access to services and highways. Existing sites will be safeguarded. | There is a need of 37 pitches, as well as an additional 4 pitches arising from households with undetermined need. Sites allocated as a result of this policy will be small-scale, therefore any potential recreational impacts are likely to be insignificant. | N/A – no pathways identified | K – Policy or proposal unlikely to have a significant effect either alone or in-combination.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Renewable and Low Carbon Energy Developments | Supports proposals for renewable energy developments (including micro-renewables and decentralised energy) subject to assessment of impacts on amenity, landscape, biodiversity, air/water quality, and Green Belt. No specific sites are allocated. | The policy outlines general criteria for renewable & low carbon energy developments, rather than proposing activities with potential for LSEs on European or Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out**: LSEs can be objectively excluded for this policy alone and in-combination. |
| Residential Design and Layout | Requires all residential development (including new dwellings, conversions, and extensions) to meet high design standards, protect character and amenity, and comply with national guidance. Includes criteria for tall buildings, subdivision of dwellings, internal space standards, and amenity space provision. | A general policy which sets out design criteria for residential development. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out**: LSEs can be objectively excluded for this policy alone and in-combination. |
| Retail | Defines the retail hierarchy, supports vitality and viability of town centres, allows intensification and redevelopment within existing centres, and sets criteria for shop fronts and active frontages. | The policy primarily relates to the location and mix of retail and town centre uses within existing urban areas. While it supports intensification and redevelopment, these changes occur within established town centres and no new pathways to European or Ramsar sites will be created which could lead to LSEs. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Social and Community Uses | Protects existing social and community facilities, sets criteria for redevelopment or change of use, and supports new or enhanced facilities as part of significant development proposals. | The policy outlines criteria for retaining, enhancing, or providing social and community facilities, rather than proposing activities with potential for LSEs on European or Ramsar sites. | N/A – no pathways identified | A – General statement of policy/general aspiration<br>B – Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |

| Policy | Policy Summary | Assessment of LSE alone | In-combination assessment | Pre-screening category and outcome |
|---|---|---|---|---|
| Sustainable Transport and Travel | Seeks to locate development where sustainable travel is realistic, require integrated transport systems, promote walking, cycling, public transport, and reduce reliance on private vehicles. Supports infrastructure improvements and requires Travel Plans for major developments. | The policy aims to reduce car dependency and emissions. This policy should support a reduction in traffic volumes in the District. In addition, development as a result of this policy will not occur within any catchments which connect hydrologically to European/ Ramsar sites. Therefore, there are no feasible pathways to connect development as a result of this policy to European/Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Trees, Woodlands, hedgerows and Landscaping | Requires development proposals to retain and protect existing trees, woodlands, and hedgerows, and provide landscaping that enhances biodiversity and local character. Refuses development that would result in loss or deterioration of protected woodland or veteran trees. | The policy outlines general criteria for safeguarding and enhancing trees and habitats. There are no specific measures within the policy that could impact upon European and Ramsar sites. | N/A – no pathways identified | E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Vision and Strategic Objectives | Sets out the overarching vision for the Three Rivers and strategic objectives to deliver sustainable development, including housing, economic growth, infrastructure, climate action, heritage conservation, and green infrastructure. | A high-level policy which provides context for other policies but is not likely to result in LSE on European or Ramsar sites alone. | N/A – no pathways identified | A - General statement of policy/general aspiration<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Warner Bros. | Allocates land for expansion of Warner Bros. Studios and associated uses, safeguarding sites for studio operations and visitor facilities. | The policy proposes significant development on greenfield land within the Green Belt. Development is expected to result in increases in traffic volumes, however the site is located a sufficient distance away from any European and Ramsar sites, that no LSEs are feasible. In addition, there are no feasible hydrological pathways to European and Ramsar sites as impacts would be anticipated within the catchment which does not include European/Ramsar sites. | N/A – no pathways identified | K – Policy or proposal unlikely to have a significant effect either alone or in-combination.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Waste Management and Recycling | Requires new development to provide waste and recycling facilities, integrate storage into design, and submit Site Waste Management Plans for major schemes. Encourages reuse of materials and circular economy principles. | The policy outlines general criteria for waste and recycling provision and construction waste management. Its purpose is to reduce waste and environmental impacts. There are no specific measures within the policy that could impact upon European and Ramsar sites. | N/A – no pathways identified | B - Policy listing general criteria for testing the acceptability/sustainability of proposals<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |
| Waterways | Protects and enhances waterways, supports water-dependent uses, and sets criteria for moorings, marinas, and facilities for water-based leisure as part of major development schemes. | The policy could enable development such as permanent moorings, marinas, and water-based leisure facilities adjacent to waterways. There are no feasible hydrological pathways to European and Ramsar sites as impacts would be anticipated within the catchment which does not include European/Ramsar sites. | N/A – no pathways identified | K – Policy or proposal unlikely to have a significant effect either alone or in-combination.<br>**Screen out:** LSEs can be objectively excluded for this policy alone and in-combination. |

### 3.4.2 Assessment of Housing Site Options

There are 54 housing sites included within the TRDLP. The sites are listed below:

- AB18: Garage Courts Parsonage Close;
- AB26: Garage Tibbs Hill Road;
- AB31: Garages Jacketts Field;
- AB39: Garages Rosehill Gardens;
- ACFS9b: Little How Croft, Abbots Langley;
- CFS26c: West of the Kings Langley Estate;
- CFS3: Land adjacent to Fraser Crescent and Woodside Road;
- CFS4: Land at Warren Court, Woodside Road;
- CFS6: Land at Mansion House Equestrian Centre;
- CFS7: Land South of the M25;
- H6: Hill Farm Industrial Estate, Leavesden;
- PCS21: Land at Love Lane;
- CFS56: Church Hill Road, Bedmond;
- NSS2: 56 High Street;
- NSS6a: North Cott East Lane;
- CFS13: Land at Oxhey Lane, Watford Heath;
- CFS14: Land north of Oxhey Lane, Carpenders Park;
- NCFS11: Grange Wood;
- ACFS1: Heath House Rickmansworth Road;
- CFS15: Alabama and Waverley, Chenies Road;
- CFS16: Land at Chorleywood Station;
- CFS18: Hill Farm, Stag Lane;
- CFS72: Land off Solesbridge Lane, Chorleywood;
- CW9: Garages at Copmans Wick;
- NCFS15: Chorleywood Library;
- NCFS17 : North Hill Farm;
- NSS23: Chorleywood Telephone Exchange Shire Lane;
- CFS20: Land at Croxley Station Watford Road;
- CFS61: Cinnamond House Cassiobridge;
- CG47: Garages off Grove Crescent;
- CG65: British Red Cross Community Way (Land at Barton Way);
- NCFS21: Land south of Scots Hill;
- CFS65: Land north of Bucknalls Lane;

- ACFS8b: Flower House 2-3 Station Road;
- NCFS20: Lonsdale, Hyde Lane;
- NSS10: Land at Mill Place, Hunton Bridge;
- NSS20: Land adj. RES site, Egg Farm Lane;
- EOS12.2: Land to the west and south of Maple Cross (combined sites);
- EOS12.3: Land to the north of Chalfont Road, Maple Cross;
- MC11: Garages rear of Longcroft Road;
- EOS7.0: Land to the south of Shepherds Lane and east of the M25;
- H15: Garages rear of Drillyard, West Way;
- P4a: Quickwood Close Garages;
- RW31: Garden land off Uxbridge Road;
- PCS16: Vivian Gardens;
- ACFS13b: Land at Hampermill Lane (Larger Site);
- CFS60: Affinity Water Depot, Church Street, Rickmansworth;
- ACFS10: Andrews Ley Farm, Harefield Road, Rickmansworth;
- CFS59: Land on London Road (care home);
- H17: Former Police Station Rectory Road;
- H22a: Depot Stockers Farm Road;
- NCFS26: Meresworth;
- CFS47c: Adams Nurseries, Church Lane, Sarratt;
- BR20: Northwick Day Centre Northwick Road;
- CFS52a: Former Sir James Altham School (northern parcel only);
- NCFS34: Pinewood Lodge; and
- PCS18: Land south of St Josephs, South Oxhey.

Sixteen of the proposed housing site options are located within the ZoI of the Chilterns Beechwoods SAC, defined as 12.6 km from the SAC boundary, based on robust visitor survey evidence[14]. This ZoI reflects the distance within which residential development has the potential to contribute to increased recreational pressure on the SAC. Given the strong evidence linking residential growth within this distance to increased recreational use, and the existing high baseline of recreational impacts at the SAC, Likely Significant Effects (LSEs) cannot be excluded for the following sites alone:

- AB18: Garage Courts Parsonage Close;
- AB26: Garage Tibbs Hill Road;
- AB31: Garages Jacketts Field;

[14] Footprint Ecology (2022) A review of sustainable visitor numbers at Burnham Beeches. Available at: Liley et al. - 2022 - A review of sustainable visitor numbers at Burnham.pdf [Accessed: 15/01/2026].

- AB39: Garages Rosehill Gardens;
- ACFS9b: Little How Croft, Abbots Langley;
- CFS26c: West of the Kings Langley Estate;
- CFS6: Land at Mansion House Equestrian Centre;
- CFS7: Land South of the M25;
- PCS21: Land at Love Lane;
- CFS56: Church Hill Road, Bedmond;
- NSS2: 56 High Street;
- NSS6a: North Cott East Lane;
- NCFS11: Grange Wood;
- ACFS8b: Flower House 2-3 Station Road;
- NSS20: Land adj. RES site, Egg Farm Lane; and
- CFS47c: Adams Nurseries, Church Lane, Sarratt.

Housing site options located beyond 12.6 km from the SAC boundary are not considered likely to contribute materially to recreational pressure on the Chilterns Beechwoods SAC. Visitor survey evidence demonstrates a sharp decline in visitor origin distances beyond this threshold, and sites further afield lack strong functional recreational linkages to the SAC.

In addition, there are no hydrological pathways linking these sites to the SAC; air quality effects are not considered significant at these distances for the qualifying features of the SAC. Therefore, LSEs can be excluded for housing site options located outside the ZoI, both alone and in-combination, and these sites are screened out of further assessment.

The closest European site is Burnham Beeches SAC, located approximately 7.8 km from the TRDLP boundary. The evidence base supporting the HRA for Burnham Beeches SAC identifies a recreational buffer of 5.6km where there is a presumption against development. As there is no spatial overlap between this buffer and the TRDLP boundary, the housing site options are not anticipated to result in increased recreational pressure, physical damage, disturbance or associated secondary effects on the SAC. Burnham Beeches SAC can therefore be screened out, both alone and in-combination.

The South West London Waterbodies SPA and Ramsar site is designated for its internationally important assemblages of wintering waterbirds, including Gadwall and Shoveler, which are supported by a complex of large reservoirs and former gravel pits connected primarily to the River Thames system. Although the River Colne flows through the Three Rivers District and ultimately joins the River Thames upstream of the designated site, the proposed housing site options would not result in changes to hydrology or water quality at a scale capable of affecting the SPA/Ramsar site. The designated waterbodies are located approximately 14.3 km downstream of the district boundary, and any potential effects arising from development would be subject to substantial dilution, attenuation and regulatory control within the wider river system.

Listed or proposed European and Ramsar sites located further afield lack credible pathways for effect, either through recreational access, hydrological changes, turbidity, siltation and waterborne pollution, and are located outside relevant ZoIs. Therefore, LSEs on these European or Ramsar sites can be excluded, both alone and in-combination, as a result of the proposed housing site options within the TRDLP boundary.

### 3.4.3 Assessment of Employment Site Options

There are 19 employment sites included within the TRDLP. These are:

- CFS11 – Carpenders Park Farm, Oxhey Lane;
- PCS2 – East Carpenders Park;
- CFS28 – Land at Gypsy Lane, Hunton Bridge;
- CFS70 – Croxley Business Park;
- CFS55 – Land at Station Road, Kings Langley;
- OSPF6 – Land West of Leavesden Aerodome, Hunton Bridge;
- CFS32 – Land at Lynsters Farm, Maple Cross;
- CFS36 – Land at Junction 17 of M25;
- NSS1 – 1 Denham Way, Maple Cross;
- CFS39B – Land to the east of Merchant Taylors School;
- NCFS5 – Land off Bedmond Road;
- NCFS35 – Land south of Chalfont Lane;
- CFS24 – South West Junction 20 of the M25;
- E(a) – Croxley Business Park;
- E(b) – Tolpits Lane;
- E(d) – Maple Cross/Maple Lodge, warehousing;
- E(e) – Kings Langley Employment Area;
- E(f) – Leavesden Park, offices; and
- WB – Warner Bros Studios.

No proposed employment sites are located within, or adjacent to, any European or Ramsar sites. No direct habitat loss, fragmentation or loss of functionally linked land would occur. Employment sites are not anticipated to give rise to increased recreational access, impacts associated with physical damage, increased disturbance and the spread of invasive non-native species can be excluded.

Burnham Beeches SAC, Chilterns Beechwoods SAC, Wormley–Hoddesdonpark Woods SAC, Richmond Park SAC, and Windsor Forest and Great Park SAC are located in separate river catchments and lack hydrological connectivity with the employment site options. Accordingly, hydrological changes, turbidity, siltation and waterborne pollution can be excluded, and LSEs on these sites can be ruled out, both alone and in combination.

The South West London Waterbodies SPA and Ramsar site is located approximately 14.3 km downstream of the TRDLP boundary, within the wider Colne catchment. Employment sites would not result in changes to water levels, flows or water quality at a magnitude capable of affecting the qualifying features of the designated site. There are no proposals for direct abstraction or discharge, surface water runoff will be managed through sustainable drainage systems, and wastewater will be treated at existing wastewater treatment works operating within permitted limits. Given the distance downstream, the managed nature of the designated waterbodies, the scale and distribution of employment development, there is no credible pathway for adverse effects on the South West London Waterbodies SPA/Ramsar site. LSEs can therefore be excluded, either alone or in combination, and the site is not considered further in the assessment.

## 3.5 Screening Findings

The HRA Stage 1: Screening has not identified any potential impact pathways arising from the development of employment sites or the Local Plan policies. Potential impact pathways have been identified in relation to the development of sixteen housing sites as a result of their location within the ZoI for the Chilterns Beechwoods SAC. LSEs can therefore not be ruled out for the following sites:

- AB18: Garage Courts Parsonage Close
- AB26: Garage Tibbs Hill Road
- AB31: Garages Jacketts Field
- AB39: Garages Rosehill Gardens
- ACFS9b: Little How Croft, Abbots Langley
- CFS26c: West of the Kings Langley Estate
- CFS6: Land at Mansion House Equestrian Centre
- CFS7: Land South of the M25
- PCS21: Land at Love Lane
- CFS56: Church Hill Road, Bedmond
- NSS2: 56 High Street
- NSS6a: North Cott East Lane
- NCFS11: Grange Wood
- ACFS8b: Flower House 2-3 Station Road
- NSS20: Land adj. RES site, Egg Farm Lane
- CFS47c: Adams Nurseries, Church Lane, Sarratt

## 3.6 Screening Conclusions

Following a review of the TRDLP, potential impact pathways have been ruled out for all European and Ramsar sites included within this report except for the Chilterns Beechwoods SAC. It was identified that the development of some sites within the Chilterns Beechwoods ZoI could undermine the Site's COs identified in Section 3.5 and therefore LSEs cannot be excluded. The next step in the HRA process, AA, must be undertaken.

# 4.0 Appropriate Assessment

## 4.1 Introduction

This section presents the AA, which involves further evaluation of the potential pathways for the Local Plan alone and in combination with other plans and projects. This stage follows on from the screening stage and aims to examine those identified LSEs on European or Ramsar sites in more detail, the adverse effects on the integrity of the site and its COs. If there is no potential for the COs to be undermined, an adverse effect can be ruled out. Each potential impact pathway identified in screening as requiring further investigation is considered in turn within this section.

### 4.1.1 Physical damage or degradation of habitats and increased disturbance

The screening stage identified that the TRDLP has the potential to lead to LSEs on the Chilterns Beechwoods SAC due to increased levels of recreation as a result of residential development within Three Rivers. These effects include direct damage to sites through fire, vandalism, littering, trampling, grazing and erosion. In addition, recreation can cause increased disturbance to the SAC and its qualifying species, which may result in a change in behaviour of species from usual routines. Changes in traffic behaviour can also lead to disturbance.

#### 4.1.2 Potential Effect Alone

Some European and Ramsar sites have an established ZoI informed by targeted visitor surveys, within which increases in population would be expected to result in adverse effects on site integrity. ZOIs are specific to each European or Ramsar site (and often to specific component sites of a European and Ramsar sites) and as such it is not always appropriate to apply a generic or non-specific ZOI to a European and Ramsar sites . ZOIs are a guide of average distance travelled to a European and Ramsar sites ; it is acknowledged that individuals may travel further than this distance. Typically, within the ZOI, existing pressures are already having an adverse effect on the integrity of the relevant site, and any new residential development would therefore contribute to this ‘in combination’ effect even if it would not have such an effect on its own. However, new residential developments outside the ZOI would not usually contribute to this in combination effect as the Site is beyond the distance typically travelled locally for recreation.

The *Chiltern Beechwoods SAC* policy within the TRDLP outlines that there is a 12.6km ZoI surrounding the SAC. This is based on information outlined within the visitor survey, recreation impact assessment and mitigation requirements for the *Chiltern Beechwoods SAC* and the Dacorum Local Plan, produced by Footprint Ecology[15]. A small area to the north of the TRDLP boundary falls within the ZOI, and there is a requirement for development within the ZOI to produce a HRA. TRDC have set a threshold of 100 dwellings or more based on advice from Natural England, outlined below:

“*The evidence suggested that Three Rivers District Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings). However, it is noted that some of the proposed allocated sites are within the Zone of Influence (Chilterns Beechwoods Special Area of Conservation). For larger developments that fall*

[15] Footprint Ecology (2022) Dacorum Recreation Evidence Base. Available at: https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-recreation-evidence-base-200322.pdf [Accessed 15/01/2026]

*within the ZOI and result in a net increase of more than 100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures*".

In total, 937 dwellings have been allocated within the ZOI. The site options and the number of dwellings allocated to these sites have been outlined in **Table 4-1**. Three of the site options (indicated in bold text in the table below) would deliver 100 or more dwellings. According to the *Chiltern Beechwoods SAC* policy, these sites will be required to deliver suitable mitigation and / or avoidance measures in order to address potential adverse effects arising from increased recreational disturbance. The remaining thirteen sites have allocated less than 100 dwellings; therefore, no actions are required.

**Table 4-1: Housing site options and proposed number of dwellings**

| Housing site options | Number of Dwellings |
|---|---|
| AB18: Garage Courts Parsonage Close | 5 |
| AB26: Garage Tibbs Hill Road | 5 |
| AB31: Garages Jacketts Field | 9 |
| AB39: Garages Rosehill Gardens | 6 |
| ACFS9b: Little How Croft, Abbots Langley | 35 |
| **CFS26c: West of the Kings Langley Estate** | **400** |
| CFS6: Land at Mansion House Equestrian Centre | 98 |
| CFS7: Land South of the M25 | 20 |
| PCS21: Land at Love Lane | 46 |
| **CFS56: Church Hill Road, Bedmond** | **102** |
| NSS2: 56 High Street | 20 |
| NSS6a: North Cott East Lane | 16 |
| NCFS11: Grange Wood | 50 |
| ACFS8b: Flower House 2-3 Station Road | 10 |
| **NSS20: Land adj. RES site, Egg Farm Lane** | **100** |
| CFS47c: Adams Nurseries, Church Lane, Sarratt | 15 |
| **Total Dwellings** | **937** |

The TRDCLP Policy *Chiltern Beechwoods SAC* provides mitigation for the impacts of increased levels of recreation resulting from development within the Chilterns Beechwoods ZoI.

It can be determined that thirteen sites within the ZoI where fewer than 100 dwellings have been allocated will not result in LSEs on the Chiltern Beechwoods SAC, as a result of the wording of the TRDCLP Policy *Chiltern Beechwoods SAC.* The policy states that development proposals which will result in a net increase in less than 100 units, or more are not likely to have a significant effect on the Chilterns Beechwoods SAC. This statement is supported by Natural England who have not included the TRDC within the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings). Action is therefore only required for sites where more than 100 dwellings have been allocated; therefore, it can be concluded that no LSEs will result from those sites where fewer than 100 dwellings have been allocated.

For the three sites included within the TRDLP which include development over 100 dwellings within the ZoI, this policy requires, where development proposals are subject to a HRA, they include the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG) or a suitable financial contribution. This mitigation is deemed sufficient to mitigate against the potential increase in recreation at the Chilterns Beechwoods SAC. This mitigation has been suggested, and therefore deemed sufficient by Natural England. It can therefore be concluded that mitigation is sufficient to determine that there will be no LSEs arising from the development of the following sites:

- CFS26c: West of the Kings Langley Estate
- CFS56: Church Hill Road, Bedmond
- NSS20: Land adj. RES site, Egg Farm Lane

No impact pathways have been identified alone, therefore in combination effects have not been considered.

## 4.2 Conclusion

Recreational pressure, leading to physical damage, degradation of habitats and increased disturbance, arising from the TRDLP could lead to adverse effects on the Chilterns Beechwoods SAC. Mitigation is provided by the Local Plan policy *Chilterns Beechwoods SAC*. With this mitigation in place, it can be determined that adverse effects on the integrity of the Chilterns Beechwoods SAC can be excluded from the TRDLP, alone or in combination. Therefore, there is no need for the HRA of the TRDLP to proceed to the following stage.

# Appendix A Relevant Legislation, Policy, Case Law and Guidance

## Three Rivers Local Plan

### Habitats Regulations Assessment

**Three Rivers District Council**

SLR Project No.: 430.000113.00001

16 January 2026

# A.1 LegisItaion

## A.1.1 The Habitats Regulations

The requirement for the HRA is set out within Article 6 if the Habitats Directive 92/43/European Economic Community (EEC) of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. This has been transposed into British law by the Conservation of Habitats & Species Regulations 2017 (as amended), also known as the 'Habitats Regulations'.

The Habitats Regulations afford protection to European sites and their interest features. Part 6 of the Conservation of Habitats and Species Regulations 2017 (as amended) sets out the requirements for screening assessments, the circumstances under which an Appropriate Assessment (AA) is required and the further implementation of Article 6(3) and 6(4) of the Habitats Directive.

The UK left the European Union (Brexit) on Exit Day, 31st January 2020, followed by Completion Day on 31st December 2020. The EU Exit Regulations (2019) establish any EU Exit-related changes to the Habitats Regulations (2017), with these considered to have no material implications on the requirement or process for a HRA of a Plan. After Brexit, UK sites designated under the Habitats Regulations became part of the National Site Network (as defined in the interpretation sections of the Habitat Regulations (2017)), with a focus on maintaining ecological coherence throughout the UK.

## A.1.2 The Environment Act (2021)

The Environment Act passed into UK law in 2021 to protect and enhance the environment for future generations. The Act sets legally binding targets to halt the decline in species by 2030, require new developments to improve or create habitats and deliver interim Environmental Improvement Plans, including interim targets. In 2018, the 25 Year Environment Plan[16] set out government actions to help the natural world regain and retain good health through ten goals. This plan was reviewed and refreshed in 2023, in line with the Environment Act 2021, to produce the Environmental Improvement Plan[17] and reinforces the vision and sets out the plan to deliver against the ten goals. The apex goal, **Goal 1**: Thriving plants and wildlife, is supported by the other nine goals:

- **Goal 2**: Clean air;
- **Goal 3**: Clean and plentiful water;
- **Goal 4**: Managing exposure to chemicals and pesticides;
- **Goal 5**: Maximise our resources, minimise our waste;
- **Goal 6**: Using resources from nature sustainably;
- **Goal 7**: Mitigating and adapting to climate change;
- **Goal 8**: Reduced risk of harm from environmental hazards;
- **Goal 9**: Enhancing biosecurity; and

[16] HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf [Accessed: 20/12/2025].

[17] HM Government (2023) Environmental Improvement Plan 2023 First revision of the 25 Year Environment Plan. Available at: https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64fffa/environmental-improvement-plan-2023.pdf [Accessed: 20/12/2025].

- **Goal 10**: Enhanced beauty, heritage, and engagement with the natural environment.

## A.2 Policy

### A.2.1 National Planning Policy Framework (2024)

In addition to the Habitats Regulations, UK Government policy (Office of the Deputy Prime Minister Circular 06/2005) states that internationally important wetlands designated under the Convention on Wetlands 1971, called the Ramsar Convention (Ramsar sites) are afforded the same protection as SPAs and SACs for the purpose of considering development proposals that may affect them. The Government also affords the same level of protection to potential SPAs (pSPAs), possible SACs (pSACs) and proposed Ramsar sites and to sites identified, or required, as compensatory measures for adverse effects on any of the above sites, through planning policy such as the National Planning Policy Framework[18].

Paragraphs 194 and 195 relate to European and Ramsar sites and state:

"*The following should be given the same protection as habitats sites:*

*a) potential Special Protection Areas and possible Special Areas of Conservation;*

*b) listed or proposed Ramsar sites; and*

*c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in-combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*."

## A.3 Case Law

### A.3.1 C-323/17 People Over Wind

In April 2018, the judgement for this case clarified that mitigation measures to avoid or reduce harmful effects on a listed or proposed European and Ramsar site(s) cannot be taken into account during the screening stage for the purposes of decision making and must instead progress through to the AA stage. This is relevant for HRAs undertaken at both the plan and project level.

### A.3.2 C-164/17 Grace and Sweetman

In July 2018, the judgement for this case clarified the distinction between mitigation and compensation in relation to HRA. "*It is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area, that such a measure may be taken into consideration when the appropriate assessment is carried out. …As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future*."

[18] Department for Levelling Up, Housing & Communities (2024) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Accessed: 20/12/2025].

Therefore, they can only be taken into account following the AA stage and passing of the three tests at the Derogations stage.

### A.3.3 C-293/17 and C-294/17 Dutch Nitrogen cases

In November 2018, the judgement for these joined cases clarified that "*it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the 'appropriate assessment'*" and "*The appropriate assessment of the implications of a plan or project for the sites concerned is not to take into account the future benefits of such 'measures' if those benefits are uncertain, inter alia because the procedures needed to accomplish them have not yet been carried out or because the level of scientific knowledge does not allow them to be identified or quantified with certainty*."

### A.3.4 C-461/17 Holohan v An Bord Pleanála

In November 2018, the judgement for this case clarified that an AA must consider the listed or proposed European and Ramsar site and its qualifying features as well as the implications of the proposed project "*for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site*." It also clarified that "*where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned*."

### A.3.5 EWHC 351 Wealden District Council v Secretary of State for Communities And Local Government & Ors 2017 (Admin)

In March 2017, the judgement for this case clarified that it requires an in-combination assessment considering the effects of other projects, which in this case resulted in an exceedance of the 1,000 Annual Average Daily Traffic threshold.

## A.4 Guidance

### A.4.1 Managing Natura 2000 Sites – the Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (2018)[19]

The European Commission has produced a document which aims at providing guidelines to the Member States on the interpretation of certain key concepts used in Article 6 of the Habitats Directive.

### A.4.2 Government guidance – Appropriate assessment: Guidance on the use of Habitats Regulations Assessment (2019)[20]

UK government guidance has been published on the use of HRA and AA. It provides further agreement in light of the People Over Wind Case (Section A.3.1) and clarification on

[19] European Commission (2018) Managing Natura 2000 sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC. Available at: https://op.europa.eu/en/publication-detail/-/publication/caf47cb6-207a-11e9-8d04-01aa75ed71a1/language-en [Accessed: 20/12/2025].

[20] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2019) Guidance

features that are integral to the design or physical characteristics of the project that is being assessed. These may include the layout, timing and location of a scheme, which may be considered at the screening stage.

### A.4.3 European Commission guidance – Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021)[21]

The European Commission has provided a methodological guidance document on the application of Article 6(3) and (4) of the Habitats Directive to assist authorities and national agencies in the Member States and in candidate countries, as well as developers, consultants, site managers, practitioners and other stakeholders in the application of obligations stemming from these provisions.

### A.4.4 Assessment of plans and projects in relation to Natura 2000 sites (2022)[22]

The European Commission supports a broad interpretation of the terms ‘plan’ and ‘project’ in the implementation of Article 6(3). The term ’plan’ includes land-use or spatial plans and sectoral plans (e. g. for transport, energy, water management) and includes National Policy Statements. Implicit in the Habitats Directive is the application of the precautionary principle, i.e. that absence of scientific evidence on the significant negative effect of an action cannot be used as justification for approval of this action. The emphasis of the assessment should thus be on objectively demonstrating, with supporting evidence, following the three stages.

### A.4.5 Government guidance – Habitats regulations assessments: Protecting a European site (2023)[23]

This guidance outlines how a competent authority must decide if a plan or a project that affects a European site can go ahead. The HRA principles and process is outlined in full detail.

Appropriate assessment Guidance on the use of Habitats Regulations Assessment. Available at: https://www.gov.uk/guidance/appropriate-assessment [Accessed: 20/12/2025].

[21] European Commission: Directorate-General for Environment (2021) Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Available at: https://op.europa.eu/en/publication-detail/-/publication/99a99e59-3789-11ec-8daf-01aa75ed71a1/language-en [Accessed 20/12/2025].

[22] European Commission: Directorate-General for Environment (2022) Guidance document on assessment of plans and projects in relation to Natura 2000 sites – A summary. Available at: https://data.europa.eu/doi/10.2779/086397 [Accessed: 20/12/2025].

[23] Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, and Natural Resources Wales (2023) Guidance Habitats regulations assessments: protecting a European site. Available at: https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site [Accessed: 20/12/2025].

### A.4.6 Government guidance – Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (2024)[24]

Guidance has been published online to summarise the applicant and decision maker obligations under the Habitats Regulations in the context of NSIPs. This refers to the guidance and the stages outlined in Appendix A.4.3.

### A.4.7 The Habitats Regulations Assessments Handbook (2024)[25]

The Handbook has two principal objectives to:

- Improve the understanding and interpretation of the Habitats Regulations; and
- Aid consistency in applying their requirements in respect of plans and projects.

Part F in particular has been referred to in the preparation of this HRA as it provides practical guidance for the assessment of plans under the Regulations.

[24] Planning Inspectorate (2025) Guidance Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments [Accessed: 20/12/2025].

[25] Tyldesley, D. and Chapman, C. (2013) The Habitats Regulations Handbook, November 2024 edition UK: DTA Publications Limited.

# Appendix B Information on European and Ramsar Sites

## Three Rivers District Local Plan

### Habitats Regulations Assessment

**Three Rivers District Council**

SLR Project No.: 430.000113.00001

16 January 2026

## B.1 European and Ramsar Sites within 20 km of the TRDLP Boundary

| Chilterns Beechwoods SAC (UK0012724) | |
|---|---|
| Location in relation to plan area | 8 km to the west of the Local Plan Area. |
| Reason(s) for designation[26]: | |
| Habitats:<br>• H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*), (note that this includes the priority feature 'important orchid rich sites').<br>• H9130 *Asperulo-Fagetum* beech forests.<br>• Species:<br>• S1083 Stag beetle, *Lucanus cervus* | |
| SSSI component sites | Ashridge Commons and Woods SSSI; Aston Rowant Woods SSSI; Bisham Woods SSSI; Bradenham Woods, Park Wood & The Coppice SSSI; Ellesborough and Kimble Warrens SSSI; Hollowhill and Pullingshill Woods SSSI; Naphill Common SSSI; Tring Woodlands SSSI; Windsor Hill SSSI. |
| Key current and predicted issues[27] | • Invasive non-native species;<br>• Problematic native species;<br>• Interspecific floral relations; and<br>• Forest and Plantation management and use. |
| Conservation Objectives[28] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;<br>• The structure and function (including typical species) of qualifying natural habitats;<br>• The structure and function of the habitats of qualifying species;<br>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;<br>• The populations of qualifying species; and<br>• The distribution of qualifying species within the site. |

[26] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Chilterns Beechwoods Special Area of Conservation (UK0012724). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012724.pdf [Accessed 15/01/2026]

[27] JNCC (2015) NATURA 2000 - Standard Data Form Chilterns Beechwoods Special Area of Conservation (UK0012724). Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012724.pdf [Accessed 15/01/2026]

[28] Natural England (2014) Chilterns Beechwoods Special Area of Conservation Conservation Objectives (UK0012724). Available at: https://publications.naturalengland.org.uk/publication/4808896162037760 [Accessed 15/01/2026]

| Burnham Beeches SAC (UK0030034) | |
|---|---|
| Location in relation to plan area | 8 km to the west of the Local Plan Area. |
| Reason(s) for designation[29]: | |
| Habitats:<br>• H9120 Atlantic acidophilous beech forests with *Ilex* and sometimes *Taxus* in the shrub layer (*Quercion robori-petraeae* or *Ilici-Fagenion*) | |
| SSSI component sites | Burnham Beeches SSSI |
| Key current and predicted issues[30] | • Outdoor sports and leisure activities, recreational activities;<br>• Air pollution, air-borne pollutants;<br>• Problematic native species;<br>• Other ecosystem modifications; and<br>• Changes in biotic conditions. |
| Conservation Objectives[31] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of qualifying natural habitats;<br>• The structure and function (including typical species) of qualifying natural habitats; and<br>• The supporting processes on which qualifying natural habitats rely. |

| South West London Waterbodies Ramsar (UK11065) | |
|---|---|
| Location in relation to plan area | 14 km to the south west of the Local Plan Area. |
| Reason(s) for designation[32]: | |
| Ramsar Criterion 6:<br>• Regularly supports 1% of the individuals in a population of one species or subspecies of waterbird. Over winter the site regularly supports internationally important populations of Gadwall (*Anas strepera*) and Shoveler (*Anas clypeata*). | |
| SSSI component sites | Kempton Park Reservoirs SSSI; Knight & Bessborough Reservoirs SSSI; Staines Moor SSSI; Thorpe Park No. 1 Gravel Pit SSSI; Wraysbury & Hythe End Gravel Pits SSSI; Wraysbury No. 1 Gravel Pit SSSI; Wraysbury Reservoir SSSI. |

[29] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Burnham Beeches Special Area of Conservation (UK0030034). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030034.pdf [Accessed 15/01/2026]

[30] JNCC (2015) NATURA 2000 - Standard Data Form Burnham Beeches Special Area of Conservation (UK0030034). Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030034.pdf [Accessed 15/01/2026]

[31] Natural England (2018) Burnham Beeches Special Area of Conservation Conservation Objectives (UK0030034). Available at: https://publications.naturalengland.org.uk/publication/6014456282742784 [Accessed 15/01/2026]

[32] JNCC (1994) Information Sheet on Ramsar Wetlands South West London Waterbodies. Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11068.pdf [Accessed 15/01/2026]

| | |
|---|---|
| Key current and predicted issues | Vegetation succession;<br>Water diversion for irrigation/domestic/industrial use;<br>Recreational/tourism disturbance; and<br>Mining exploitation/exploration. |
| Conservation Objectives | N/A for Ramsar sites, refer to South West London Waterbodies SPA. |

| **South West London Waterbodies SPA (UK9012171)** | |
|---|---|
| Location in relation to plan area | 14 km to the south west of the Local Plan Area. |
| Reason(s) for designation[33]: | |
| Species:<br>• A051 Gadwall, *Mareca strepera*<br>• A056 Shoveler, *Spatula clypeata*<br>Qualifies as internationally important because it regularly supports more than 1% of the Northwestern/Central European population of Shoveler and Gadwall during the non-breeding season. | |
| SSSI component sites | Kempton Park Reservoirs SSSI; Knight & Bessborough Reservoirs SSSI; Staines Moor SSSI; Thorpe Park No. 1 Gravel Pit SSSI; Wraysbury & Hythe End Gravel Pits SSSI; Wraysbury No. 1 Gravel Pit SSSI; Wraysbury Reservoir SSSI. |
| Key current and predicted issues[34] | • Marine and Freshwater aquaculture;<br>• Outdoor sports and leisure activities, recreational activities;<br>• Invasive non-native species;<br>• Abiotic (slow) natural processes; and<br>• Changes in biotic conditions. |
| Conservation Objectives[35] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of the habitats of the qualifying features;<br>• The structure and function of the habitats of the qualifying features;<br>• The supporting processes on which the habitats of the qualifying features rely;<br>• The population of each of the qualifying features; and<br>• The distribution of the qualifying features within the site. |

[33] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features South West London Waterbodies Special Protection Area (UK9012171). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9012171.pdf [Accessed 15/01/2026]

[34] JNCC (2015) NATURA 2000 - Standard Data Form South West London Waterbodies Special Protection Area. Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012171.pdf [Accessed 15/01/2026]

[35] Natural England (2019) South West London Waterbodies Special Protection Area Conservation Objectives (UK9012171). Available at: UK9012171-South-West-London-Waterbodies-SPA-V2019.pdf [Accessed 15/01/2026]

| Windsor Forest and Great Park SAC (UK0012586) | |
|---|---|
| Location in relation to plan area | 16 km to the south west of the Local Plan Area. |
| Reason(s) for designation[36]: | |
| Habitats:<br>• H9120 Atlantic acidophilous beech forests with *Ilex*<br>• H9190 Old acidophilous oak woods with *Q. robur* on sandy plains<br>Species:<br>• S1079 Violet click beetle, *Limoniscus violaceus* | |
| SSSI component sites | Windsor Forest and Great Park SSSI |
| Key current and predicted issues[37] | • Forest and Plantation management and use;<br>• Air pollution, air-borne pollutants;<br>• Invasive non-native species; and<br>• Interspecific floral relations. |
| Conservation Objectives[38] | • The extent and distribution of qualifying natural habitats and habitats of qualifying species;<br>• The structure and function (including typical species) of qualifying natural habitats;<br>• The structure and function of the habitats of qualifying species;<br>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;<br>• The populations of qualifying species; and<br>• The distribution of qualifying species within the site. |

| Richmond Park SAC (UK0030246) | |
|---|---|
| Location in relation to plan area | 19 km to the south of the Local Plan Area. |
| Reason(s) for designation[39]: | |
| Species:<br>• S1083 Stag beetle, *Lucanus cervus* | |
| SSSI component sites | Richmond Park SSSI |

[36] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Windsor Forest and Great Park Special Area of Conservation (UK0012586). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012586.pdf [Accessed 15/01/2026]

[37] JNCC (2015) NATURA 2000 - Standard Data Form Windsor Forest and Great Park Special Area of Conservation (UK0012586). Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012586.pdf [Accessed 15/01/2026]

[38] Natural England (2014) Windsor Forest and Great Park Special Area of Conservation Conservation Objectives (UK0012586). Available at: https://publications.naturalengland.org.uk/publication/5175000009015296 [Accessed 15/01/2026]

[39] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Richmond Park Special Area of Conservation (UK0030246). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030246.pdf [Accessed 15/01/2026]

| | |
|---|---|
| Key current and predicted issues[40] | None identified. |
| Conservation Objectives[41] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of the habitats of qualifying species;<br>• The structure and function of the habitats of qualifying species;<br>• The supporting processes on which the habitats of qualifying species rely;<br>• The populations of qualifying species; and<br>• The distribution of qualifying species within the site. |

| **Wormley-Hoddesdonpark Woods SAC (UK0013696)** | |
|---|---|
| Location in relation to plan area | 19 km to the north east of the Local Plan Area. |
| Reason(s) for designation[42]: | |
| Habitats:<br>• H9160 Sub-Atlantic and medio-European oak or oak-hornbeam forests. | |
| SSSI component sites | Wormley-Hoddesdonpark Wood South SSSI; Wormley-Hoddesdonpark Woods North SSSI. |
| Key current and predicted issues[43] | • Air pollution, air-borne pollutants;<br>• Invasive non-native species;<br>• Problematic native species;<br>• Interspecific floral relations; and<br>• Other human intrusions and disturbances. |
| Conservation Objectives[44] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of qualifying natural habitats;<br>• The structure and function (including typical species) of qualifying natural habitats; and<br>• The supporting processes on which qualifying natural habitats rely. |

[40] JNCC (2015) NATURA 2000 - Standard Data Form Richmond Park Special Area of Conservation (UK0030246). Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030246.pdf [Accessed 15/01/2026]

[41] Natural England (2018) Richmond Park Special Area of Conservation Conservation Objectives (UK0030246). Available at: https://publications.naturalengland.org.uk/publication/5279688851193856 [Accessed 15/01/2026]

[42] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Wormley-Hoddesdonpark Woods Special Area of Conservation (UK0013696). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013696.pdf [Accessed 15/01/2026]

[43] JNCC (2015) NATURA 2000 - Standard Data Form Wormley-Hoddesdonpark Woods Special Area of Conservation (UK0013696). Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013696.pdf [Accessed 15/01/2026]

[44] Natural England (2014) Wormley-Hoddesdonpark Woods Special Area of Conservation Conservation Objectives (UK0013696). Available at: https://publications.naturalengland.org.uk/publication/4919819195383808 [Accessed 15/01/2026]

## B.2 European and Ramsar Sites more than 20 km from the TRDLP Boundary

| Lee Valley SPA (UK9012111) | |
|---|---|
| Location in relation to plan area | 21 km to the south east of the Local Plan Area. |
| Reason(s) for designation[45]: | |
| Species:<br>• A021 Bittern, *Botaurus stellaris*<br>• A051 Gadwall, *Mareca strepera*<br>• A056 Shoveler, *Spatula clypeata*<br>Qualifies as internationally important because it regularly supports more than 1% of the Northwestern/Central European population of Shoveler and Gadwall during the non-breeding season. | |
| SSSI component sites | Amwell Quarry SSSI; Rye Meads SSSI; Turnford & Cheshunt Pits SSSI; Walthamstow Reservoirs SSSI. |
| Key current and predicted issues[46] | • Marine and Freshwater aquaculture;<br>• Outdoor sports and leisure activities, recreational activities;<br>• Pollution to groundwater (point sources and diffuse sources);<br>• Human induced changes in hydraulic conditions; and<br>• Biocenotic evolution, succession. |
| Conservation Objectives[47] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of the habitats of the qualifying features;<br>• The structure and function of the habitats of the qualifying features;<br>• The supporting processes on which the habitats of the qualifying features rely;<br>• The population of each of the qualifying features; and<br>• The distribution of the qualifying features within the site. |

| Lee Valley Ramsar (UK11065) | |
|---|---|
| Location in relation to plan area | 21 km to the south east of the Local Plan Area. |
| Reason(s) for designation[48]: | |

[45] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Lee Valley Special Protection Area (UK9012171). Available at: https://publications.naturalengland.org.uk/publication/5670650798669824 [Accessed 15/01/2026]

[46] JNCC (2015) NATURA 2000 - Standard Data Form Lee Valley Special Protection Area (UK9012111). Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012111.pdf [Accessed 15/01/2026]

[47] Natural England (2019) Lee Valley Special Protection Area Conservation Objectives (UK9012111). Available at: https://publications.naturalengland.org.uk/publication/5670650798669824 [Accessed 15/01/2026]

[48] JNCC (1994) Information Sheet on Ramsar Wetlands Lee Valley. Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11034.pdf [Accessed 15/01/2026]

| | |
|---|---|
| Ramsar Criterion 2:<br>• Supports vulnerable, endangered, or critically endangered species or threatened ecological communities, or species or communities that are rare or scarce at the national or international level. The site supports the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).<br>Ramsar Criterion 6:<br>• Regularly supports 1% of the individuals in a population of one species or subspecies of waterbird. Over winter the site regularly supports internationally important populations of Gadwall (*Anas strepera*) and Shoveler (*Anas clypeata*). | |
| SSSI component sites | Amwell Quarry SSSI; Rye Meads SSSI; Turnford & Cheshunt Pits SSSI; Walthamstow Reservoirs SSSI. |
| Key current and predicted issues | No factors reported. |
| Conservation Objectives | N/A for Ramsar sites, refer to South West London Waterbodies SPA. |

| **Thames Basin Heaths SPA (UK9012141)** | |
|---|---|
| Location in relation to plan area | 24 km to the south west of the Local Plan Area. |
| Reason(s) for designation[49]: | |
| Species:<br>• A302 Dartford warbler, *Sylvia undata*<br>• A224 Nightjar, *Caprimulgus europaeus*<br>• A246 Woodlark, *Lullula arborea* | |
| SSSI component sites | Ash to Brookwood Heaths SSSI; Bourley and Long Valley SSSI; Bramshill SSSI; Broadmoor to Bagshot Woods and Heaths SSSI; Castle Bottom to Yateley and Hawley Commons SSSI; Chobham Common SSSI; Colony Bog and Bagshot Heath SSSI; Eelmoor Marsh SSSI; Hazeley Heath SSSI; Horsell Common SSSI; Ockham and Wisley Commons SSSI; Sandhurst to Owlsmoor Bogs and Heaths SSSI; Whitmoor Common SSSI. |
| Key current and predicted issues[50] | • Outdoor sports and leisure activities, recreational activities;<br>• Forest and Plantation management and use;<br>• Air pollution, air-borne pollutants;<br>• Other human intrusions and disturbances; and<br>• Biocenotic evolution, succession. |
| Conservation Objectives[51] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of the habitats of the qualifying features; |

[49] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Thames Basin Heaths Special Protection Area (UK9012141). Available at: https://publications.naturalengland.org.uk/publication/4952859267301376 [Accessed 15/01/2026]

[50] JNCC (2015) NATURA 2000 - Standard Data Form Thames Basin Heaths Special Protection Area (UK9012141). Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012141.pdf [Accessed 15/01/2026]

[51] Natural England (2019) Thames Basin Heaths Special Protection Area Conservation Objectives (UK9012141). Available at: https://publications.naturalengland.org.uk/publication/4952859267301376 [Accessed 15/01/2026]

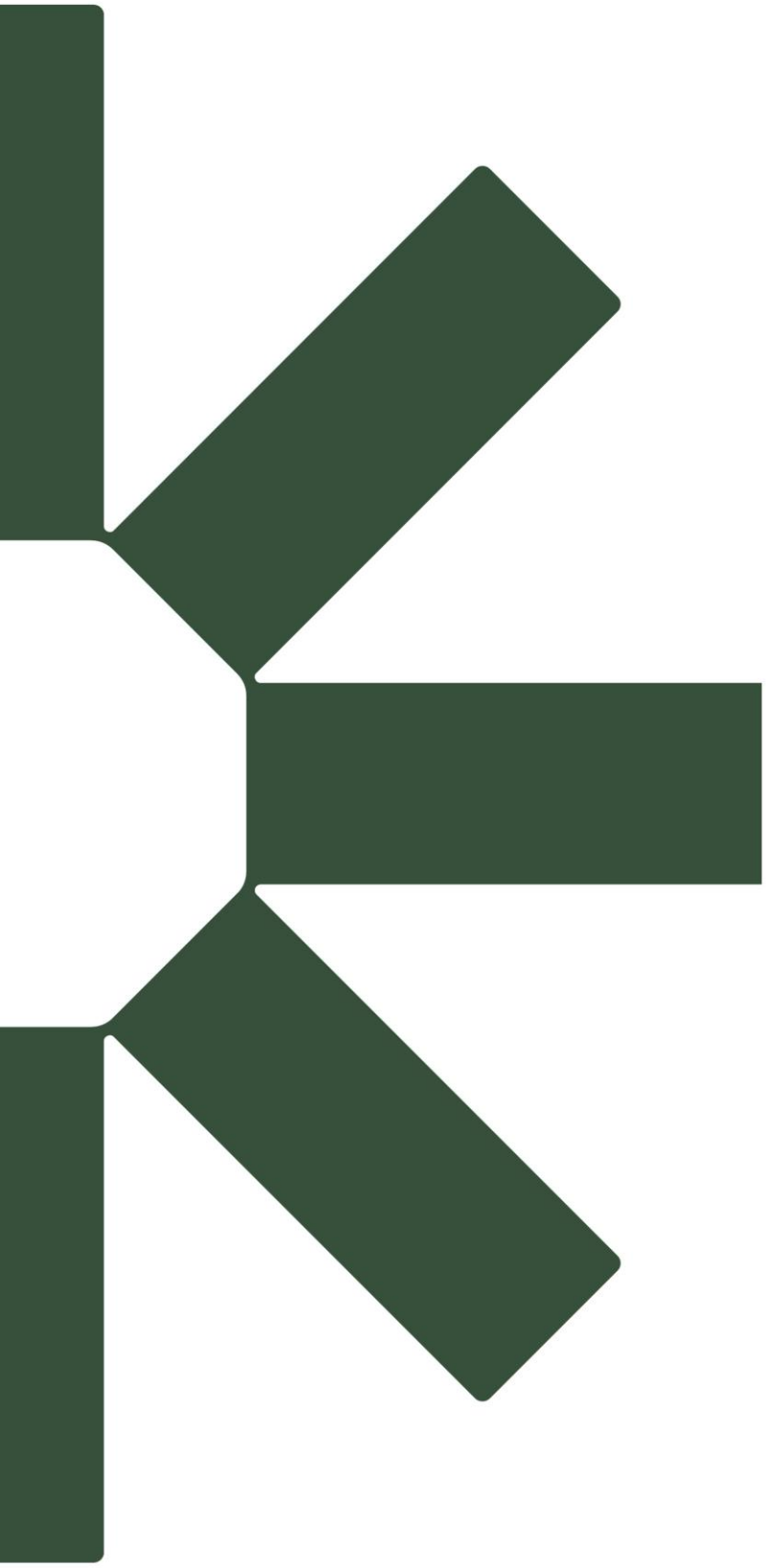
| | |
|---|---|
| | • The structure and function of the habitats of the qualifying features;<br>• The supporting processes on which the habitats of the qualifying features rely;<br>• The population of each of the qualifying features; and<br>• The distribution of the qualifying features within the site. |

| **Aston Rowant SAC (UK0030082)** | |
|---|---|
| Location in relation to plan area | 27 km to the west of the Local Plan Area. |
| Reason(s) for designation[52]: | |
| Habitats:<br>• H5130 *Juniperus communis* formations on heaths or calc grasslands<br>• H9130 *Asperulo-Fagetum* beech forests | |
| SSSI component sites | Aston Rowant SSSI |
| Key current and predicted issues[53] | • Interspecific floral relations;<br>• Unknown threat or pressure;<br>• Problematic native species; and<br>• Changes in biotic conditions. |
| Conservation Objectives[54] | Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by *maintaining or restoring*;<br>• The extent and distribution of qualifying natural habitats;<br>• The structure and function (including typical species) of qualifying natural habitats; and<br>• The supporting processes on which qualifying natural habitats rely. |

[52] Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Aston Rowant Special Area of Conservation (UK0030082). Available at: https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030082.pdf [Accessed 15/01/2026]

[53] JNCC (2015) NATURA 2000 - Standard Data Form Aston Rowant Special Area of Conservation (UK0030082). Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030082.pdf [Accessed 15/01/2026]

[54] Natural England (2014) Aston Rowant Special Area of Conservation Conservation Objectives (UK0030082). Available at: https://publications.naturalengland.org.uk/publication/5707034853933056 [Accessed 15/01/2026]



This page is intentionally left blank

# Three Rivers District Council Local Plan

## Integrated Health and Equality Impact Assessment

### Three Rivers District Council

Three Rivers House, Northway, Rickmansworth WD3 1RL

Prepared by:

**SLR Consulting Limited**

Broadwalk House, Southernhay West, Exeter, EX1 1GE

SLR Project No.: 430.000113

Client Reference No: C0427

16 January 2026

Revision: 1

## Revision Record

| Revision | Date | Prepared By | Checked By | Authorised By |
|---|---|---|---|---|
| 1 | 16 January 2026 | CT/AG | KH | VP |

# Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Three Rivers District Council (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

# Table of Contents

**Basis of Report** ..... i
**1.0 Introduction** ..... 1
1.1 Overview ..... 1
1.2 Purpose of this Document ..... 1
1.3 Equality Impact Assessment ..... 1
1.4 Health Impact Assessment ..... 2
1.5 Sustainability Appraisal ..... 2
1.6 Habitats Regulation Assessment ..... 3
**2.0 Three Rivers Local Plan** ..... 4
2.1 Plan Area ..... 4
2.2 Development of the Local Plan ..... 5
**3.0 Methodology** ..... 6
3.1 Policy Context ..... 6
3.2 Work Undertaken to Date ..... 8
3.3 Scope of Assessments ..... 9
3.3.1 Equalities Impact Assessment ..... 9
3.3.2 Health Impact Assessment ..... 10
3.4 Spatial and Temporal Scope ..... 14
3.5 EqIA Methodology ..... 15
3.6 HIA Methodology ..... 16
3.7 Stakeholder Engagement ..... 17
3.8 Assumptions and Limitations ..... 17
**4.0 Baseline and Key Issues** ..... 18
4.1 Introduction ..... 18
4.2 Key Equality Baseline Trends ..... 18
4.3 Key Equality Issues ..... 18
4.4 Key Health Baseline Trends ..... 19
4.5 Key Health Issues ..... 19
**5.0 Assessment** ..... 21
5.1 Introduction ..... 21
5.2 Assessment Overview ..... 21
5.3 Spatial Strategy ..... 28
5.4 Sustainable Development ..... 29
5.5 Employment ..... 30

5.6 Social and Community Facilities/ Health and Wellbeing ..... 31
5.7 Climate Change ..... 32
5.8 Green Belt ..... 33
5.9 Environment ..... 34
5.10 Green Blue Infrastructure ..... 35
5.11 Design and Heritage ..... 36
5.12 Transport and Connections ..... 37
5.13 Other Policies (Northwood Headquarters (MOD)) ..... 39
**6.0 Mitigation, Enhancements and Recommendations ..... 40**
**7.0 Next Steps ..... 45**

## Tables in Text

Table 3 -1:-- Relevant Planning Policy Context ..... 6
Table 3 -2: Protected Characteristics ..... 9
Table 3-3 – Key Determinants of Health ..... 10
Table 3-4 – HIA Vulnerable Groups ..... 13
Table 3-5 – Key to Equality Effects ..... 15
Table 3-6 - Key to Health Effects ..... 16
Table 5-1: Summary of HIA Findings ..... 21
Table 5-2: Summary of EqIA Findings ..... 23
Table 6-1: Mitigation and Enhancement Measures ..... 40

## Figures in Text

Figure 2-1 – The Three Rivers District ..... 4

## Appendices

**Appendix A Baseline Information**
**Appendix B HIA Assessment Matrices**
**Appendix C EqIA Assessment Matrices**

# 1.0 Introduction

## 1.1 Overview

Three Rivers District Council (TRDC) is preparing a Local Plan to manage the future development and growth of the area between 2024 and 2041. This is intended to replace the previous Core Strategy (adopted October 2011)[1], the Development Management Policies Local Development Document (adopted July 2013)[2] and the Site Allocations Local Development Document (adopted on 2014)[3]. It will also reflect relevant legislative requirements, as well as those of the National Planning Policy Framework (NPPF) 2024 and National Planning Practice Guidance (NPPG).

The Three Rivers Local Plan will be subject to a Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA), an Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

The EqIA and HIA are being undertaken together and reported on as an Integrated Health and Equalities Impact Assessment (IHEIA) - this document.

## 1.2 Purpose of this Document

This IHEIA pulls together both the HIA and EqIA assessment processes into one streamlined assessment process. It identifies the potential impacts on protected and vulnerable groups and identifies opportunities within the power of the Local Plan for more positive health and equality outcomes.

## 1.3 Equality Impact Assessment

An EqIA is a way of measuring the potential impact (positive, negative or neutral) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010[4]. This Act places a Public Sector Equality Duty on the Council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. The Equality Duty came into force in April 2011 and covers the following Protected Characteristics:

- **Age** (a person belonging to a particular age or range of ages);
- **Disability** (a person has a disability if they a physical or mental impairment that has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities);
- **Gender reassignment** (people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) for the purpose of reassigning their sex);
- **Marriage and civil partnership** (marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership);

[1] Core Strategy Adopted 17 Oct 2011.doc (threerivers.gov.uk)

[2] Final Development Management Policies LDD Adopted July 2013.doc (threerivers.gov.uk)

[3] d70a5a90-9ff4-11ed-8d80-6dc425ce7e94-site-allocations-ldd-adopted-25-november-2014 (1).pdf (threerivers.gov.uk)

[4] Equality Act, 2010

- **Pregnancy and maternity** (pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth);
- **Race** (a group of people defined by their colour, nationality (including citizenship) ethnic or national origins);
- **Religion or belief** (religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical beliefs including lack of belief);
- **Sex** (a man or a woman, or to a group of people of the same sex); and
- **Sexual orientation** (whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes).

## 1.4 Health Impact Assessment

A HIA is a means of assessing the potential health impacts of policies, plans and projects. The HIA process is designed to help decision-makers ensure that health and wellbeing is being properly considered in planning policies and proposals. HIA is not a statutory requirement of the plan preparation process. However, planning practice guidance states that 'Local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making'[5]. It also states that 'a health impact assessment may be a useful tool to use where there are expected to be significant impacts'.

In addition, Hertfordshire County Council's Public Health Department and Spatial Planning Unit have produced a Health Impact Assessment Position Statement[6], which outlines the countywide stance on HIAs in relation to planning. This sets clear thresholds for HIAs, for which plans and projects that support the development of 100 or more residential dwellings, should have a supporting HIA.

## 1.5 Sustainability Appraisal

A SA of Development Plan Documents (DPDs) is required under Section 19 of the Planning and Compulsory Purchase Act 2004[7]. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)[8]. The SEA Regulations transpose the SEA Directive (2001/42/EC)[9] into English law and applies to a range of plans and programmes, including DPDs. The purpose of the SEA Directive is to ensure a high level of environmental protection, and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development.

The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the DPD policies and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's

[5] [Withdrawn] New national planning policy and guidance aims to promote health and reduce inequalities - GOV.UK (www.gov.uk)

[6] Hertfordshire County Council, Position Statement: Health Impact Assessments, Version 1.2, 2019

[7] Planning and Compulsory Purchase Act 2004

[8] The Environmental Assessment of Plans and Programmes Regulations 2004

[9] European Commission, SEA Directive (2001/42/EC)

development. The Local Plan objectives, policies and development sites will be appraised against a set of objectives to identify whether there is the potential for significant effects (either positive or negative) and recommendations will be put forward to mitigate any significant adverse effects. Guidance for Sustainability Appraisal (SA) sets out an objectives-led, staged process.

A separate SA is being carried out by WSP. SLR are working closely with WSP to ensure the baseline data used in both assessments are aligned. Results of the SA and IHEIA will also feed into each assessment.

## 1.6 Habitats Regulation Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any protected Habitat Sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

Natural England was consulted on the scope of the HRA in July 2024 and responded in August 2024 to confirm that it does not consider that the Three Rivers Local Plan poses any likely risk or opportunity in relation to its statutory purpose, and did not wish to comment on the consultation.

A HRA screening exercise has been undertaken to determine if the preferred options (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Habitat Site, in terms of its conservation objectives and qualifying interests. Natural England will be given an opportunity to comment on the findings of the HRA screening exercise.

The HRA identified potential impact pathways from sixteen housing sites which could lead to LSEs in relation to physical damage or degradation of habitats and increased disturbance on one European site, Chilterns Beechwoods SAC. Therefore, the next stage of the HRA, Stage 2: Appropriate Assessment, has been undertaken.

The HRA has been prepared separately and will be consulted on alongside the Local Plan, SA and this IHEIA.

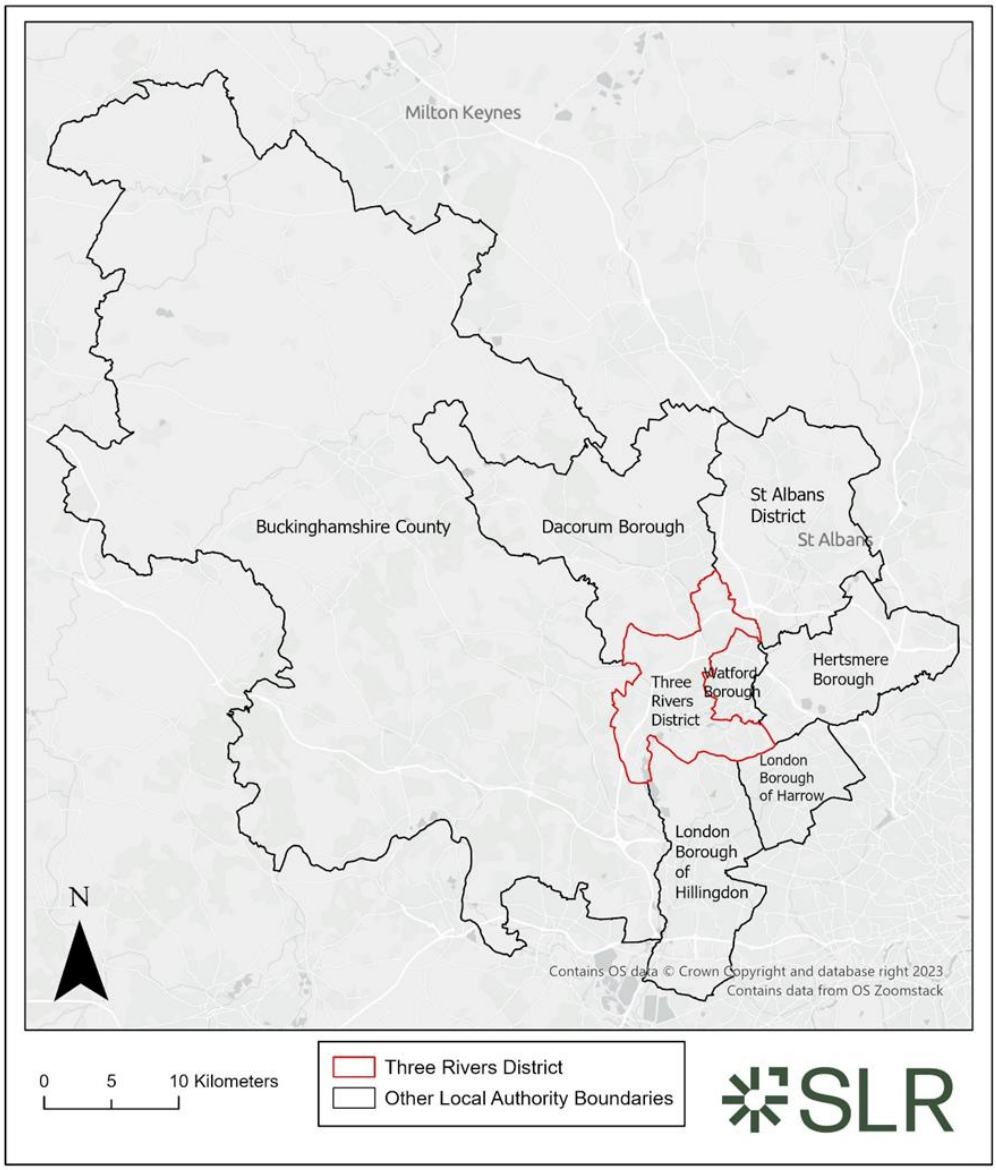
# 2.0 Three Rivers Local Plan

## 2.1 Plan Area

Three Rivers is a local government district in south-west Hertfordshire. Figure 2-1 below shows that the district is bordered by Buckinghamshire County to the west, Dacorum Borough to the north, St Albans District in the north east, Watford and Hertsmere to the east and the London boroughs of Harrow and Hillingdon in the south.

The district is approximately 88.8 km$^2$ in size and, it has a population of roughly 95,800 and includes towns like Rickmansworth, Chorleywood, Croxley Green, and Abbots Langley. The district combines suburban and rural landscapes, with extensive Green Belt land and good transport links via the M1, M25, and rail services into London (both overground and underground services). It is home to major employers such as Warner Bros Studios Leavesden and British Telecom.

**Figure 2-1 – The Three Rivers District**



## 2.2 Development of the Local Plan

The Three Rivers Local Plan will replace the previous Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013) and the Site Allocations Local Development Document (adopted on 2014). The new Local Plan will replace these documents by providing replacement strategic and development management policies and site allocations in a single document along with an overall vision and key objectives. The Local Plan will cover the period 2024-2041.

One of the key requirements for producing a new Local Plan will be to identify sufficient land for housing, economic development and other uses to meet the identified needs of the district, whilst at the same time ensuring that such land can be readily brought forward for development, including to enable TRDC to demonstrate a five-year supply of deliverable housing sites.

A number of consultations have been carried out in order to determine the scale of housing growth to be taken forward in the Local Plan. Following changes to the NPPF[10] in 2022, a low growth housing approach was consulted on between October and December 2023. This approach removed any sites that held a moderate or high harm level to the Green Belt from the Local Plan. A low growth housing option was taken forward by Council members, however, following the General Election in 2024, consultation on a new NPPF was launched on 30th July 2024 which has caused a review of the Local Development Scheme for the Local Plan in order to undertake additional and updated evidence base studies and in order to ascertain where further scale and distribution options require consideration.

The Local Plan is now at the Regulation 19 stage – this is the final public consultation stage before the plan goes for independent examination.

[10] Ministry of Housing, Communities and Local Government, National Planning Policy Framework, 2024

# 3.0 Methodology

## 3.1 Policy Context

The relevant national and local policy context relevant for both equalities and health is set out in Table 3-1 below. This isn't an exhaustive list but includes those most relevant to the IHEIA. At the previous scoping stage, a more extensive policy review was undertaken. This can be found in Appendix A.

**Table 3 -1: Relevant Planning Policy Context**

| Policy/ Guidance Document | Key Messages |
|---|---|
| ***National*** | |
| National Planning Policy Framework (NPPF) (December 2024)[11] | Section 8 relates to the promotion of healthy and safe communities. Paragraph 96 refers to planning decisions, stating as follows:<br>''Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which: promote social interaction…; are safe and accessible…; and enable and support healthy lifestyles…".<br>Paragraph 98 states that: "To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: …take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community…". |
| Planning Practice Guidance (PPG): Healthy and Safe Communities (August 2022)[12] | Planning Practice Guidance: Healthy and Safe Communities is a web-based resource which is updated as necessary. It advises that HIA may be a useful tool to use where there are expected to be significant impacts. The range of issues to be considered in decision-making in respect of health and health infrastructure include:<br>• Opportunities for healthy lifestyles have been considered (e.g., planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);<br>• Potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and<br>• Access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted. |
| Public Health England, Health Impact Assessment | Public Health England (PHE) published the Guide 'Health Impact Assessment in Spatial Planning' (2020) for use of HIA in the land use planning system. The Guide sets out how, in the case of planning applications, applicants should determine the approach to HIA depending on the scale and nature of the |

[11] Ministry of Housing, Communities and Local Government, National Planning Policy Framework: December 2024 National Planning Policy Framework (Accessed 9/1/25)

[12] Ministry of Housing, Communities and Local Government, Healthy and Safe Communities Healthy and safe communities - GOV.UK (Accessed 9/1/25)

| Policy/ Guidance Document | Key Messages |
|---|---|
| in Spatial Planning (October 2020)[13] | Proposed Development, and how HIA should contribute to informing planning decisions. |
| The Housing Act 2004[14] | The Act covers housing conditions, and licensing of houses in multiple occupation and residential accommodation. It requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area and produce a strategy on how these needs can be met. |
| Future of an Ageing Population, 2016[15] | The report brings together evidence about today's older population, with future trends and projections, to identify the most critical implications for government policy and the socioeconomic resilience of the UK. |
| Health Impact Assessment (HIA) and Local Development Plans (LDPs): A Toolkit for Practice, 2021, Wales Health Impact Assessment Support Unit[16] | This Toolkit aims to support the collaboration between the planning and public health sectors in order to maximize positive health and well-being outcomes through land use planning policies that create healthy, equitable and cohesive communities. |
| ***Local*** | |
| Hertfordshire Health and Wellbeing Strategy 2022-2026[17] | The Health and Wellbeing Strategy sets out our vision and strategic priorities for improving health and wellbeing and reducing health inequalities in the County. The vision of the strategic is 'Working in partnership and with our communities to improve their health, wellbeing, and their quality of life to reduce health inequalities and help people live longer and healthier lives'. The ambitions of the strategy are:<br>1. Strong communities<br>2. Healthy and fulfilling lives<br>3. Effective, joined up health and care services |
| Three Rivers District Council Equality, Diversity and Inclusion Policy, 2023[18] | This policy highlights the District's vision for equality, diversity and inclusion ("A district where everyone feels welcome, that they belong and that they are safe"), as well as the objectives in place in order to achieve this vision:<br>1. To promote equality of opportunity in employment and training<br>2. To improve equality and access to services for all residents<br>3. To strengthen knowledge and understanding of all Three Rivers communities<br>4. To celebrate diversity, promote inclusion and enhance community life in partnership with communities |

[13] Public Health England, Health Impact Assessment in Spatial Planning Health Impact Assessment in spatial planning - GOV.UK

[14] The Housing Act, 2004

[15] Government Office for Science, Future of an Ageing Population, 2016

[16] Wales Health Impact Assessment Support Unit, Health Impact Assessment (HIA) and Local Development Plans (LDPs): A Toolkit for Practice, 2021

[17] Hertfordshire Health and Wellbeing Strategy 2022-2026

[18] Three Rivers District Council Equality, Diversity and Inclusion Policy, 2023

| Policy/ Guidance Document | Key Messages |
|---|---|
| Three Rivers Safeguarding and Managing Crime Plan 2021/24[19] | The plan indicates through specified actions and objectives how the CSP will address the six priority areas of work. All Priorities listed are areas that need focus and attention in 2021-2024. The priorities are:<br>1. Serious Violence and Exploitation.<br>2. Domestic Abuse<br>3. Exploitation Prevention<br>4. Motor Vehicle Crime<br>5. Burglary and Fraud<br>6. Hate Crime and Prevent |
| Three Rivers Community Strategy 2023-2028[20] | The vision of the Three Rivers Community Strategy is for Three Rivers to be a district:<br>1. that is inclusive and where people feel they are welcome and belong<br>2. where local infrastructure supports healthy lifestyles and addresses health inequalities<br>3. where our residents are supported and feel safe<br>4. that takes action to mitigate and adapt to the climate emergency<br>5.where our local businesses are beneficial to and benefit from local people |

## 3.2 Work Undertaken to Date

In early 2025, work started on producing a Scope and Methodology Report (SMR) which sets out the methodology and criteria to be used for assessing and determining likely equality and health effects arising as a result of the Regulation 19 Local Plan. It provided an outline description of the development of the draft plan, as well as outlining the proposed scope of the EqIA and HIA, identifying the issues to be addressed, the geographical coverage and the periods in time for which impacts will be assessed.

This report set out the key policy context and baseline information – from this key health and equality issues were identified. Following the review of the baseline information, key issues and relevant plans, policies and guidance, the scope of the EqIA and HIA was determined including the identification of protected characteristics, vulnerable groups and key determinants of health to be considered.

The SMR was shared with relevant stakeholders at TRDC and the Public Health Healthy Places team at Hertfordshire County Council, in order to agree the scope and methodology. Both TRDC and the Public Health Healthy Places team agreed with the proposed scope and methodology.

[19] Three Rivers Safeguarding and Managing Crime Plan 2021/24

[20] Three Rivers Community Strategy 2023-2028

## 3.3 Scope of Assessments

Due to the differences in assessment processes, the two assessments have been undertaken separately. However, this report combines findings and where appropriate combines mitigation and enhancement measures. The scope of the two assessment processes has been outlined below.

### 3.3.1 Equalities Impact Assessment

The EqIA has considered the effects of the Local Plan objectives and policies on the protected characteristics, as listed under the Equality Act. Table 3-2 below outlines those protected characteristics scoped in or out of the EqIA element of the IHEIA. A precautionary approach has been taken to ensure that all effects can be captured.

Whilst not a protected characteristic as listed under the Equality Act, consideration of socio-economic status is widely included within EqIAs, as people who face socio-economic disadvantage can experience inequality of outcomes such as poorer health, poorer housing and fewer opportunities for education and jobs.

**Table 3 -2: Protected Characteristics**

| Personal Protected Characteristics | Scope In/ Out? | Justification |
|---|---|---|
| Age | ✓ | Different age groups are likely to experience the effects of the Local Plan differently, some of which may be disproportionate. The Local Plan will likely help address the needs of an ageing population. |
| Disability | ✓ | Some disability groups may benefit from policies that encourage wider accessibility, better wayfinding and accessible housing, whilst some types of developments and policies may disproportionately exclude some disability groups. |
| Gender Reassignment | ✓ | Those undergoing or planning on undergoing gender reassignment may benefit from greater protection from policies that address commuting safety and inclusivity. |
| Marriage and civil partnership | × | The Local Plan is unlikely to generate any positive or negative effects on marriage or civil partnerships. |
| Pregnancy and maternity | ✓ | This group may benefit from policies that encourage wider accessibility, social interaction and the increase in community infrastructure. |
| Race | ✓ | Different racial groups may benefit from greater protection from policies that address commuting safety and support inclusivity and diversity. Additionally, the plan may make provision for accommodation to meet the needs of Gypsy and Traveller groups. |
| Religion or belief | ✓ | Different religious groups may benefit from greater protection from policies that address commuting safety and support inclusivity and diversity. Additionally, policies may support the development of community facilities which may benefit some religious groups |

| Personal Protected Characteristics | Scope In/ Out? | Justification |
|---|---|---|
| Sex | ✓ | Males and females are likely to experience the effects of the Local Plan differently, some of which, may be disproportionate. Females are likely to benefit from policies which support community safety and inclusive design. |
| Sexual Orientation | ✓ | The LGBTQI+ community are likely to experience the effects of the Local Plan differently, some of which, may be disproportionate. This groups may benefit from policies that support increased community safety and support diversity. |
| Socio-economic Status | ✓ | Those lower socio-economic groups will likely benefit from policies and housing allocations that support affordable housing as well as supporting improvements to the existing housing stock. This group are also likely to benefit from policies that support greater employment opportunities. |

### 3.3.2 Health Impact Assessment

For the purposes of the HIA, both vulnerable groups and determinants of health have been identified. The assessment has provided evidence of how key determinants of health will be affected by the general principles and policies are likely effects on the study area population, and any specific vulnerable groups.

The key determinants of health that have been considered and the rationale for their inclusion are set out in Table 3-3 below.

**Table 3-3 – Key Determinants of Health**

| Determinant of Health | Rationale |
|---|---|
| Air Quality | Poor air quality is the largest environmental risk to public health. Exposure to air pollution can lead to chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, ultimately leading to reduced life expectancy. As identified in the baseline, there are existing air quality issues in the district.<br>The Local Plan may include policies that increase accessibility, reducing the need to travel and improving air quality. However, there may be some short-term effects associated with construction that could temporarily reduce air quality (in particular dust) which may exacerbate some chromic conditions. |
| Noise | Exposure to high levels of noise can lead to both short term health effects such as annoyance and sleep disturbance which can go on to cause longer term health issues such as hearing impairment, reduce performance and learning attainment and even cardiovascular disease. As identified in the baseline, there are some areas in the district experiencing high levels of noise.<br>Policies in the Local Plan may include policies that increase accessibility and reduce the need to travel which may help to reduce noise from the transport network. However, some policies may support new town centre developments as |

| Determinant of Health | Rationale |
|---|---|
| | well as the nighttime economy which could increase levels of noise in some locations. |
| Housing and Homelessness | The lack of housing or poor-quality housing can negatively affect both physical and mental health and wellbeing, particularly through physical attributes such as mould, damp, lack of insulation, noise exposure and overcrowding. Conditions can lead to respiratory conditions, cardiovascular disease and communicable disease transmission, and subsequently increased mortality. Poor housing conditions or lack of housing can also lead to increased stress and a reduction in a sense of empowerment and control over life which can lead to depression and anxiety[21].<br><br>The Local Plan is likely to include policies that will address the housing demand (including affordable, accessible and adaptable homes) as well as poor quality housing. |
| Economy and Employment | Stable and secure work can improve health and wellbeing through regular income, social interaction, and sense of purpose. In comparison, those in poor-quality jobs or unemployment are known to suffer worse health than those in good quality work[22].<br><br>The Local Plan is likely to include policies that make provision for increasing employment provision and improving access to employment centres. |
| Skills and Education | Education is important for health as it provides the skills and specialist knowledge needed to secure good jobs and participate in society[23]. Access to further training can help to support who are in poor quality to retrain and upskill and gain more secure employment.<br><br>The Local Plan is likely to support greater access to skills and education through employment opportunities as well as provision of social infrastructure which may include educational facilities. Conversely, increasing the population in the district could put greater strain on existing facilities. |
| Social Cohesion and Community Safety | Strong social connections are linked to lower rates of depression and anxiety and greater resilience to stress. Poor social relationships have also been found to increase the likelihood of a stroke by almost a third (32%)[24].<br><br>Areas with high levels of crime often have lower levels of social interaction. Additionally, people with a strong fear of crime are almost twice as likely to show symptoms of depression[25].<br><br>Local Plan policies are likely to lead to improve safety, provision of social infrastructure and support community engagement and empowerment. |

[21] The role of homes and buildings in levelling up health and wellbeing, 2022 | House of Commons Library

[22] Employment, Productivity and Work | Manchester University

[23] Lifelong Learning and Levelling Up: Building Blocks for Good Health, 2021 | The Health Foundation

[24] Older people living alone are 50% more likely to visit A&E than those who live with others | The Health Foundation

[25] Individuals with high fear of crime twice as likely to suffer from depression | UCL

| Determinant of Health | Rationale |
|---|---|
| Access to Services | Research has suggested that 'access to local shops, post offices, places of entertainment and community activity all contribute to well-being'[26], and access to good health services was a key contributor to how good somewhere is to live[27].<br><br>The Local Plan is likely to increase and enhance existing community facilities providing greater access to services. Conversely, increasing the population in the district could put greater strain on existing facilities. |
| Physical Activity | Being physically active plays an essential role in ensuring health and wellbeing. Exercise and physical activity can reduce some of the risk factors for non-communicable diseases such as diabetes, heart disease and come cancers, including reducing blood pressure, improving cholesterol levels, and lowering body mass index (BMI)[28].<br><br>The Local Plan is likely to include policies that make provision for active travel and community facilities which help increase levels of physical activity of the district's population. |
| Landscape quality and green/ blue infrastructure | The quality of the landscape in which people lead their lives makes a difference to the quality of their lived experience[29]. Landscape quality can encompass many elements of which can benefit the population including mitigation against environmental pollution, respite and tranquillity, provision of green and blue infrastructure, and providing a perception of personal security and a sense of place.<br><br>The Local Plan is likely to include policies and site allocations which likely improved the district's landscape setting and increase and enhance green and blue infrastructure. Conversely, some site allocations could result in the release of greenbelt which may detract from the overall landscape quality. |
| Healthy food environments | Access to healthy food is crucial for overall health, and inequalities in access contribute to health disparities, particularly affecting those in lower-income areas, the disabled, and certain ethnic groups.<br><br>In line with the NPPF, local planning authorities should refuse applications for hot food takeaways and fast-food outlets. This should be a consideration with regards to site allocations as well as planning policy. |

As outlined above, the HIA has considered the effects on each determinant of health and consider the impact they may have on vulnerable groups of the population. Whilst some of these vulnerable groups may overlap with the protected characteristics identified for the EqIA, these are more specific and represent smaller sub-populations that may experience differential health effects. Table 3-4 below sets out these vulnerable groups and the rationale for their inclusion, in line with those potential effects on determinants of health, identified in Table 3-3 above.

[26] Harding, T., 1997, A Life Worth Living: The Independence and Inclusion of Older People, London: Help the Aged, cited in Randall, C., 2012.

[27] Department for Communities and Local Government, 2008, Place survey | UK Government

[28] The Economic Benefits of Walking and Cycling | The Department for Transport

[29] Landscape and Quality of Life | C, Thompson et al

**Table 3-4 – HIA Vulnerable Groups**

| Vulnerable Group | Rationale |
|---|---|
| Children and young people | Children and young people can be more affected by the effects of noise and air pollution. There is a strong link between air pollution and the worsening of asthma symptoms in children and can play a part in causing asthma in some[30]. Children are vulnerable partly because they breathe more rapidly and are closer to the ground, where pollutants are more highly concentrated[30]. |
| Older people | Older people are especially vulnerable to loneliness and social isolation, which can have a serious effect on their health. With more people living longer, a quarter of all people nationally aged 50 and over now live alone and it is predicted that this number will rise significantly by 2043[31]. The number aged 65 and over in the district is also set to continue to rise.<br><br>Additionally, as older people will most likely suffer from chronic diseases (such as chronic lung, heart or circulatory conditions) which may worsen following exposure to environmental pollutants[32]. |
| People with disabilities and mobility impairment | People with disabilities can face additional barriers when trying to access services, which can include online services that are not accessible, infrastructure that can be physically inaccessible and attitudinal barriers[33]. Sustrans identified that disabled people felt less safe walking alone in all settings than non-disabled people[34]. People with disabilities are likely to have a limited capacity to adapt to change. |
| People with existing physical and mental health conditions | Those with existing health conditions are likely to be susceptible to the effects of air and noise pollution. Noise pollution can exacerbate mental health conditions such as stress, anxiety, Attention-Deficit/Hyperactivity Disorder (ADHD) and autism. As stated above, chronic diseases (such as chronic lung, heart or circulatory conditions) which may worsen following exposure to air pollution. People with existing physical and mental health conditions are likely to have a limited capacity to adapt to change. |
| Women and girls | Every three days, a woman in the UK is killed by a man and one in four women experience domestic abuse in their lifetimes[35]. Women and girls are also disproportionately affected by feeling unsafe and as a result, are often changing the way that they live and move. Half of all women felt unsafe walking alone after dark both in a quiet street near their homes and within a busy public space[34]. This increased to 80% when walking alone in a park or other open space[34]. |
| Care leavers | Adults who were in residential care as a child are between three and four times more likely to report their health as 'not good' compared with 'good'. They are |

[30] Air Pollution in Children | Impact on Urban Health

[31] The State of Ageing 2023-2024 | Centre for Aging Better

[32] Adverse Effects of Outdoor Pollution in the Elderly | Journal of Thoracic Disease

[33] Challenges faced by people with disabilities | House of Lords Library

[34] Personal safety: Women's experiences of being alone after dark | Sustrans

[35] A Whole-Society Approach to Ending Violence Against Women and Girls: VAWG Sector Manifesto | End Violence Against Women

| Vulnerable Group | Rationale |
|---|---|
| | also more likely to experience barriers to employment and housing, experience social isolation, live in poverty and be at a higher chance of committing a crime[36]. |
| Unemployed and low-income groups | Unemployment is associated with lower life expectancy and poorer physical and mental health, both for unemployed individuals and their households[37]. Unemployment can be linked to depression, anxiety and low self-esteem.<br><br>Money and resources can affect health in a number of ways as people need a certain level of income to be able to afford the basics for a healthy life, such as food, utilities and quality housing. Beyond a basic level of income, stresses still exist and can eventually harm physical health[38].<br><br>Whilst the district is amongst the least deprived nationally, there are pockets of deprivation in South Oxhey. |
| Socially excluded or isolated groups | There are clear racial inequalities when it comes to healthcare. Several socially excluded groups have been shown to experience higher rates of mental ill-health than the general population[37].<br><br>Romany and Traveller people face life expectancies between ten and 25 years shorter than the general population. Some of this comes down to Lack of trust in services as a result of fear of and experiences of discrimination[39].<br><br>Beyond just access to healthcare, socially excluded groups may not be able or be willing to access facilities and services or interact with their communities, which can lead to isolation and loneliness. |

## 3.4 Spatial and Temporal Scope

Effects have been considered at varying spatial levels according to the nature of the effect and the aspect of the plan that gives rise to the effect. For example, some effects have occurred within the land temporarily or permanently required for the allocations within the plan, with potential effects for communities both inside and outside the land requirements. Other effects, including noise and air quality effects, will take place at varying distances from the allocation, and may affect neighbouring settlements and communities.

The IHEIA has assessed the direct and indirect health effects on local communities anticipated to result from the implementation of the Local Plan. The geographic study area of the assessment is therefore contained to the Three Rivers District.

Equality and health effects will be considered for the duration of the plan period (2024-2041) and beyond.

[36] Children's Commissioner, New findings on how children in care interact with the criminal justice system, 2022

[37] What are Health Inequalities | The King's Fund

[38] Relationship between income and health | The Health Foundation

[39] Briefing: Health inequalities experienced by Gypsy, Roma and Traveller communities | Friends, Families and Travellers

## 3.5 EqIA Methodology

There is a limited range of guidance available that is specifically driven by practical application of EqIA, and none of which is statutory guidance. Relevant guidance on fulfilling the Public Sector Equality Duty (PSED) is listed in Section 3.1 of this report.

Meeting the Equality Duty in Policy and Decision-Making Guidance[40] states that *'there is no prescribed methodology for assessing the impact on equality'* but recognises that established methods of equality assessment can be useful in enabling public sector bodies to appraise and report on their consideration of equality.

The EqIA has not assessed the significance of effects. Instead, qualitative descriptive judgments will be made regarding the nature of potential equality effects. Equality effects are defined as where an impact is identified as likely to have disproportionate or differential effect on groups of people on the grounds of their protected characteristics.

A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. For the purposes of this EqIA, disproportionality has arisen in two main ways, either:

- Where an impact is predicted on a residential area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in the wider local authority district and/or county/region; or
- Where an impact is predicted on a community resource predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very elderly people).

A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic, irrespective of the number of people affected.

In some cases, protected characteristic groups have been subject to both disproportionate and differential equality effects.

The EqIA has considered impacts on groups of people rather than on individuals. Individuals may experience equality effects, but these are not reported, due to data protection considerations.

An assessment matrix has been used which will assess each policy individually and will identify the effects against each of the protected characteristics scoped into the assessment. Effects are set out in Table 3-5 below.

**Table 3-5 – Key to Equality Effects**

| Symbol | Effect |
|---|---|
| + | Beneficial equality outcomes |
| - | Adverse equality outcomes |
| +/- | Mixed equality outcomes, which may come from differential effects on a protected characteristic |

[40] Equality and Human Rights Commission, Meeting the Equality Duty in Policy and Decision-Making, 2014

| Symbol | Effect |
|---|---|
| ? | Uncertain equality outcomes, which may be dependent upon implementation or further detail may be required |
| 0 | Neutral |

There is no legally prescribed form or structure for the content of an EqIA or HIA Report. The IHEIA Report is structured in a logical and comprehensible manner, taking account of the need for the information to be accessible, understandable and readable to a broad audience and drawing on information contained within the separate SA.

## 3.6 HIA Methodology

Whilst there is no formally adopted guidance for undertaking HIA, there are a number widely accepted best practice guides. Most notable and relevant to this HIA is the Wales Health Impact Assessment Support Unit's (WHIASU) guidance[41]. In addition, the Hertfordshire's HIA Assessment Matrix[42] has also been utilised.

As per the WHIASU guidance, this is a prospective Rapid HIA exercise, which means it's a being undertaken alongside the plan development and *'involves a brief investigation of health impacts, including a short literature review of quantitative and qualitative evidence and the gathering of knowledge and further evidence from a number of local stakeholders'*. This is less resource intensive than a comprehensive HIA which often includes extensive literature searches, development of a steering group and the collection of primary data.

For the HIA, the proposed policies and policy themes within the Local Plan have been considered and assessed against each of the identified determinants of health outlined above. It has provided evidence of how each determinant impacts human health and the effect that the general principles and policies are likely to have on the health of the study area population, and any specific vulnerable groups.

In line with Hertfordshire's Health Impact Assessment Matrix[43] the HIA assessment has not applied significance, but instead assigned types of effects as detailed in Table 3-6 below.

**Table 3-6 - Key to Health Effects**

| Symbol | Effect |
|---|---|
| + | Beneficial health outcomes |
| - | Adverse health outcomes |
| +/- | Mixed health outcomes, which may come from differential effects on different vulnerable groups |

[41] WHIASU, Health Impact Assessment, A Practical Guide

[42] Hertfordshire County Council, HIA Assessment Matrix for developers

[43] Hertfordshire County Council, HIA Assessment Matrix for developers

| Symbol | Effect |
|---|---|
| ? | Uncertain health outcomes, which may be dependent upon implementation or further detail may be required |
| 0 | Neutral |

## 3.7 Stakeholder Engagement

The process of consultation and engagement – and the feedback which this generates – can also be instrumental in influencing the development of plan policies. As both the EqIA and HIA are progressed, wider stakeholder engagement may be undertaken. Early engagement with the TRDC's Community Partnership Team and Hertfordshire County Council's Public Health department has helped to identify key groups. As work progresses, we will continue to consult further as part of the Regulation 19 consultation processes. Those groups identified for further engagement include:

- Hertfordshire and West Essex Integrated Care System;
- Hertfordshire's Citizens Panel;
- Three River's Local Strategic Partnership Board Members (such as Watford and Three Rivers Trust, Herts Mind Network);
- NHS Hertfordshire Community;
- Charity groups such as Age UK and the Royal National Institute of Blind People;
- Herts Interfaith Forum;
- Trans Unite;
- Three Rivers Youth Council (including the Youth Council for young people special educational needs and disabilities); and
- Community groups.

## 3.8 Assumptions and Limitations

Changes in public policy, economic and other wider factors will shape, in both intended and unintended ways, the social, economic and environmental conditions that influence inequality and the way it is experienced amongst affected communities.

The assessment has been focussed on the Local Plan policies and has not considered the site allocations. This is to avoid duplication with the SA.

For assessment purposes it has been necessary to assume that the baseline characteristics established during the EqIA and HIA processes will remain largely unchanged. Where information on forecast changes to population characteristics or planned community facilities are available, these have been incorporated into the assessment where relevant.

The assessment of the Local Plan has been undertaken as a desk-based exercise using the baseline information collated within this report. No site visits have been undertaken specifically for the purposes of the IHEIA.

The assessment qualitative and the potential effects having been identified through professional judgment.

# 4.0 Baseline and Key Issues

## 4.1 Introduction

This section sets out the key baseline trends and issues that were identified within the SMR. For the purposes of the assessment, health and equality issues have been presented separately. The baseline data included within the SMR has been set out in Appendix A.

## 4.2 Key Equality Baseline Trends

The population of the district will continue to increase, and the average age of the population will continue to get older. The proportion of residents aged 65 and over will continue to increase, as residents live longer and birth rates fall. This increase could lead to changes to the types of accommodation required, and how healthcare and leisure facilities are used within the district.

General improvement in deprivation levels could be possible which would be consistent with recent trends, but large variations between different parts of the district are likely to persist. Indices of Multiple Deprivation is derived from seven topic areas including income; employment; health and disability; education, skills and training; barriers to housing services; crime; and living environment deprivation. Multiple agencies are responsible for tackling different forms of deprivation, including healthy lifestyles. This makes prediction difficult.

The number of children in care is increasing nationally, which will lead to an increase in the number of care leavers requiring additional support, such as access to healthcare, employment, further education and housing.

## 4.3 Key Equality Issues

The following key baseline issues have been identified:

- The population of the district is expected to increase;
- The district has an ageing population, with 24.2% of residents predicted to be aged 65 or older by 2041. This is likely to lead to a higher number of residents with increased care and housing needs;
- The number of frail and disabled residents, and those requiring Adult Social Care, is likely to increase with the ageing population;
- The district is ethnically diverse and is likely to become more diverse. Whilst diversity should be celebrated, work is needed to address inequalities particularly with regards to health, crime and income;
- The district is generally not deprived, however pockets of deprivation exist in wards such as South Oxhey;
- Hertfordshire has the second highest number of care leavers in the region. Care leavers can often experience discrimination, stigma, and prejudice in their day to day lives; and
- The number of children care is increasing nationally, leading to an increase in the number of care leavers requiring additional support.

## 4.4 Key Health Baseline Trends

As the population grows and ages, health prospects may worsen, creating more pressure on the NHS and poor health in residents e.g. childhood obesity, cancer, frailty and health issues associated with poor air quality. Development pressure will continue to place pressure on open space and allotments.

Mental health issues associated with financial pressures are likely to continue as are inequalities in health such as life expectancy, child obesity and physical activity associated with deprivation.

Hertfordshire's Local Transport Plan is promoting more walking and cycling across the county. Further policy intervention would support improving levels of physical activity through walking and cycling, improving access to facilities and services by these modes through improvements to the public realm and improving access to open space.

Continued improvement in education is likely. A range of organisations are responsible for delivering education and training provision.

Housing affordability is largely determined by house prices (themselves largely based on economic cycles and housing supply), and the ability of households to buy property (household income, availability of credit). Given the difficulty in forecasting economic trends and recent uncertainty surrounding inflation, it is difficult to predict whether housing affordability will change in the near term and which direction such change could take. Increased housing provision in the long-term could address the persistent under delivery of homes which supports higher house prices and could therefore help improve the affordability of housing.

## 4.5 Key Health Issues

The following key baseline issues have been identified:

- Levels of deprivation vary throughout the district; life expectancy is 7.2 years lower for men and 5.1 years lower for women in the most deprived areas of Three Rivers than in the least deprived areas;
- Levels of activity vary throughout the district; 87% of residents in the least deprived areas of Three Rivers are found to carry out at least an hour of moderate intensity physical activity a week compared to 61% in the most deprived areas;
- Childhood obesity is a growing issue within some wards the district; 38% of primary school children in South Oxhey leave school overweight, compared to 29.7% of primary school children in other wards;
- There is a need to encourage more walking and cycling to encourage further physical activity in residents;
- The number of older residents suffering with dementia and loneliness is likely to increase with the ageing population;
- Air Quality Focus Areas may be exacerbating inequalities related to air pollution health issues;
- There is a lack of allotment space within the District.
- Access to green space within the district is below the recommended provision per person[44]. Three Rivers District Council aims to have no net loss of public open space, sport and recreation facilities;

[44] Green Space Index 2024 (arcgis.com) (Accessed 05/08/24)

- There is a need for flexibility for any future increased/changing health infrastructure need over the lifespan of the plan, due to the Three Rivers' rapidly ageing population, among other health issues (e.g.: childhood obesity, cancer).
- Crime rates within Three Rivers are low, but fear of crime remains an issue locally;
- The highest rate of offenses is violence against persons and burglaries;
- Housing affordability is a key issue, meaning there is a need to increase the supply of affordable housing (particularly social rented housing);
- Housing development must take into account the needs of those with accessibility issues (including those with disabilities and older people) by building with accessibility in mind, to The Building Regulations (2010) standards (Part M), as well as increasing the provision of accommodation that is suitable for the needs of older people with different requirements;
- There is a need for a mix of housing types, sizes and tenures to be provided to meet the requirements of different groups in the community (e.g.: affordable housing, suitable accommodation for the needs of an aging population etc.);
- In 2023, average weekly earnings for men were significantly higher for women in the district, compared to women;
- There is a need to reduce the number of unemployed residents on claimant benefits, and encourage them to re-enter the workforce; and
- There is a need to improve and extend the public transport network across the district, in order to support a wide range of residents.

# 5.0 Assessment

## 5.1 Introduction

This section presents the findings from the HIA and EqIA assessments which has focussed on the Local Plan policies. Further details on these assessments can be found in **Appendix B** (HIA) and **Appendix C** (EqIA).

## 5.2 Assessment Overview

A summary of the HIA findings is shown in Table 5-1 below and the EqIA findings are presented in Table 5-2 overleaf.

**Table 5-1: Summary of HIA Findings**

| Policy Grouping | Air Quality | Noise | Housing | Economy and Employment | Education and Skills | Social Cohesion and Community Safety | Access to Services | Physical Activity | Green Infrastructure |
|---|---|---|---|---|---|---|---|---|---|
| Spatial Strategy | - | - | +/- | + | 0 | + | + | + | + |
| Sustainable Development | ? | ? | + | 0 | 0 | + | +/- | ? | ? |
| Employment | ? | ? | + | + | + | + | + | ? | ? |
| Social and Community Facilities/ Health and Wellbeing | + | + | + | ? | ? | + | + | + | + |
| Climate Change and Net Zero | + | 0 | + | 0 | 0 | + | + | + | ? |
| Green Belt | 0 | 0 | 0 | 0 | 0 | + | + | + | +/- |

| Policy Grouping | Air Quality | Noise | Housing | Economy and Employment | Education and Skills | Social Cohesion and Community Safety | Access to Services | Physical Activity | Green Infrastructure |
|---|---|---|---|---|---|---|---|---|---|
| Environment | + | + | 0 | 0 | 0 | + | 0 | 0 | 0 |
| Green and Blue Infrastructure | + | + | 0 | ? | 0 | + | + | + | + |
| Design and Heritage | + | + | + | 0 | 0 | + | + | + | + |
| Transport and Connections | +/- | +/- | 0 | + | + | + | + | + | 0 |
| Other | - | - | 0 | + | + | 0 | 0 | 0 | 0 |

**Table 5-2: Summary of EqIA Findings**

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status |
|---|---|---|---|---|---|---|---|---|---|
| **Spatial Strategy** | | | | | | | | | |
| Overall Levels of Growth | +/- | +/- | 0 | + | + | + | + | 0 | +/- |
| Infrastructure Delivery | + | + | 0 | + | + | + | + | 0 | + |
| **Sustainable Development** | | | | | | | | | |
| Housing Density | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + |
| Provision for Gypsies, Travellers and Travelling Showpeople | 0 | 0 | 0 | 0 | + | + | 0 | 0 | + |
| Affordable Housing | + | + | 0 | + | 0 | + | 0 | 0 | + |
| Housing Mix and Type | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + |
| **Employment** | | | | | | | | | |
| Retail | +/- | +/- | + | +/- | + | + | + | + | + |

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status |
|---|---|---|---|---|---|---|---|---|---|
| Warner Brothers Allocation | +/- | +/- | + | +/- | + | + | + | + | +/- |
| Employment and Economic Development | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + |
| **Social and Community Facilities/ Health and Wellbeing** | | | | | | | | | |
| Health and Wellbeing | + | + | + | + | + | + | + | + | + |
| Social and Community Uses | + | + | 0 | + | + | + | 0 | 0 | + |
| **Climate Change and Net Zero** | | | | | | | | | |
| Flood Risk and Water Resources | + | + | 0 | + | 0 | + | 0 | 0 | + |
| Net Zero Operational Carbon in New Build Residential Development | + | + | 0 | + | 0 | + | 0 | 0 | + |
| Net Zero Operational Carbon in New Build Non-Residential Development | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + |
| Climate-adapted Design and Construction | + | + | 0 | + | 0 | + | 0 | 0 | + |

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status |
|---|---|---|---|---|---|---|---|---|---|
| Embodied Carbon and Minimising Waste | + | + | 0 | + | 0 | + | 0 | 0 | + |
| Reducing Carbon Emissions in Existing Buildings | + | + | 0 | + | + | + | 0 | 0 | + |
| **Green Belt** | | | | | | | | | |
| Green Belt | + | + | 0 | + | 0 | 0 | 0 | 0 | + |
| **Environment** | | | | | | | | | |
| Waste Management and Recycling | +/- | +/- | 0 | +/- | 0 | 0 | 0 | 0 | 0 |
| Ground Conditions, Contamination and Pollution | + | + | 0 | + | 0 | 0 | 0 | 0 | + |
| **Green and Blue Infrastructure** | | | | | | | | | |
| Chiltern Beechwoods Special Area of Conservation (SAC) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Green Blue Infrastructure | + | + | 0 | + | 0 | 0 | 0 | 0 | + |

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status |
|---|---|---|---|---|---|---|---|---|---|
| Open Space, Play Space, Sport and Recreation | + | + | 0 | + | 0 | 0 | 0 | 0 | + |
| Trees, Woodlands, Hedgerows and Landscaping | + | + | 0 | + | 0 | 0 | 0 | 0 | + |
| Biodiversity | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + |
| Landscape Character | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + |
| **Design and Heritage** | | | | | | | | | |
| Advertisements | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Local Distinctiveness and Place Shaping | + | + | + | + | + | + | + | + | + |
| Heritage and the Historic Environment | + | 0 | 0 | 0 | + | + | 0 | 0 | 0 |
| Residential Design and Layout | + | + | 0 | + | + | + | 0 | + | + |
| **Transport and Connections** | | | | | | | | | |
| Broadband and Electronic Communication | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + |

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status |
|---|---|---|---|---|---|---|---|---|---|
| Deliveries Servicing and Construction | ? | ? | 0 | ? | 0 | 0 | 0 | 0 | 0 |
| Waterways | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Parking | +/- | +/- | 0 | +/- | 0 | 0 | 0 | 0 | + |
| Sustainable Transport and Travel | + | + | 0 | + | 0 | 0 | 0 | 0 | + |
| **Other** | | | | | | | | | |
| Northwood Headquarters (MOD) | +/- | +/- | 0 | +/- | 0 | 0 | 0 | 0 | + |

## 5.3 Spatial Strategy

**Summary of Health Impacts**

Overall, it is anticipated that the proposed spatial strategy policies will have a positive impact on the health determinants listed below:

- **Economy and Employment:** Spatial strategy seeks to direct new development to the most sustainable locations such that residents can access employment without being dependent on the use of private vehicles. The Overall Levels of Growth policy also confirms that existing employment sites will be safeguarded which is important in ensuring such sites can continue to positively contribute to the local economy;
- **Social Cohesion and Community Safety:** The development of new housing is anticipated to encourage social interaction and a sense of community belonging. This includes through ensuring development is also directed to sustainable locations which will help ensure all residents in the community have equitable access to essential services. Social cohesion will also be strengthened via the Infrastructure Delivery policy that will ensure new development will deliver new infrastructure and service provision, secured by planning obligations;
- **Access to Services**: The Infrastructure Delivery policy seeks to ensure new services/infrastructure is delivered to address local needs (both for existing and future residents) which implies new services will be delivered in response to increased demands (e.g. increased school places). The spatial strategy also seeks to direct new development to the most sustainable locations so that residents can access services without being dependent on the use of the car;
- **Physical Activity**: the Infrastructure Delivery policy states that 'footpaths, cycle paths and roads; and green spaces' form part of local infrastructure requirements which suggests opportunities to enhance physical activity will be encouraged. The spatial strategy also explains that potential sites for housing with 'poor opportunities for walking and cycling' were discounted which is particularly important in ensuring residents are able to engage in active travel.
- **Green Infrastructure:** The spatial strategy seeks to limit Green Belt development, which in turn may protect existing green infrastructure. The Infrastructure Delivery policy also explains green infrastructure will be enhanced and conserved.

Other determinants considered in the HIA are anticipated to be subject to uncertain equality outcomes including Air Quality and Noise impacts which may be exacerbated by new employment related development.

This is aside from the housing determinant which is anticipated to have mixed outcomes. Whilst there will be beneficial effects as a result of housing being directed to the most sustainable locations, the Local Plan significantly underdelivers its housing need. This may have negative health outcomes given the district has an acute affordable housing and specialist accommodation need (particularly given the districts ageing population) and it is unclear if such needs will be delivered in full.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed spatial strategy will have a positive impact on the protected characteristics listed below:

- **Pregnancy and Maternity:** Ensuring development is sustainably located and accessible is beneficial for those who are pregnant/in maternity who sometimes find it more difficult to travel further distances to reach access essential services; and
- **Religion or Belief/Race/Sex:** Ensuring development is sustainably located and accessible is beneficial for all groups is important in ensuring equal access to services.

However, it is anticipated that the proposed spatial strategy will have mixed impacts on the protected characteristics listed below:

- **Age/Disability:** The Local Plan significantly underdelivers on its calculated housing need which may affect younger persons/future first time buyers if this comes at the expense of affordable units, as well as older persons if the required specialist housing is not delivered. In addition, whilst high density development (as proposed) is important in ensuring greater access to services, where high quality communal open space and shared ground floor facilities is not provided in tall buildings, residents may be subjected to social isolation; and
- **Socio-economic Status:** The Local Plan significantly underdelivers on its calculated housing need which may displace socio-economically deprived groups if this comes at the expenses of affordable units. Such groups may also be subject to reduced economic mobility if housing is not delivered near employment destinations/services.

## 5.4 Sustainable Development

**Summary of Health Impacts**

Overall, it is anticipated that the proposed sustainable development policies will have a positive impact on the health determinants listed below:

- **Housing:** These policies support additional housing provision, including high quality housing and a mix of housing types and tenures, contributing to ensuring appropriate housing for current and future populations. Additionally, these policies aid in providing affordable and adaptable homes.
- **Social Cohesion and Community Safety:** The development of new housing is anticipated to encourage social interaction and a sense of community belonging. The Housing Mix and Type policy supports the creation of balanced and sustainable communities as well as ensuring specialised and supported accommodation supports integration with the community, while the Provision for Gypsies, Travellers and Travelling Showpeople policy also contributes to improving social cohesion.
- **Access to Services**: Mixed effects have been identified for Access to Services, as the policies outlined within this theme positively contribute to access to services throughout the district. However, increased population in the district may put pressure on existing services, resulting in increased waiting times and reduced capacity.
- **Air Quality, Noise, Physical Activity and Green Infrastructure:** Uncertain effects have been identified for the Air Quality, Noise, Physical Activity and Green Infrastructure policies. This has been identified where effects are likely to be determined by the type and location of developments that may arise as a result of the Plan.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed sustainable development policies will have a positive impact on the protected characteristics listed below:

- **Age:** These policies support additional housing provision, including affordable, adaptable, and wheelchair accessible homes;
- **Disability:** These policies support additional housing provision, including affordable, adaptable, and wheelchair accessible homes;
- **Pregnancy and Maternity:** Affordable housing provision within the district is anticipated to result in positive effects for single parent households;
- **Religion or Belief:** Providing adequate provision for Gypsies, Travellers and Travelling showpeople benefits these groups through providing sites and improved access to local services and facilities;
- **Race:** Providing adequate provision for Gypsies, Travellers and Travelling Showpeople benefits these groups, providing sites and improved access to local services and facilities. Additionally, affordable housing provision within the district is anticipated to result in positive effects for racially discriminated groups, ensuring plots are provided for Gypsies, Travellers and Travelling Showpeople; and
- **Socio-economic Status:** These policies support additional housing provision, including affordable, adaptable, and wheelchair accessible homes. Additionally, providing adequate provision for Gypsies, Travellers and Travelling Showpeople aids in improved access to local services and facilities.

## 5.5 Employment

**Summary of Health Impacts**

Overall, it is anticipated that the proposed employment policies will have a positive impact on the health determinants listed below:

- **Housing:** Employment development will be delivered alongside new housing, allowing residents to access employment opportunities in a sustainable manner;
- **Employment and Economy:** New opportunities will be provided for the local workforce, and the expansion of the Warner Brother Film Studios will strengthen Leavesden's role as a major visitor location. Additionally, the Retail policy will develop the amenity and service offering of town and district centres which will provide an economic boost to the local economy;
- **Education and Skills**: A range of types and sizes of employment sites and premises will be delivered across the plan period which will provide new opportunities for all members of society with different socio-economic backgrounds;
- **Access to Services:** The Retail policy will improve access to services through new industry and warehousing, public and community, leisure and tourism and town centre developments. Furthermore, the Employment and Economic Development policy prevents development that will cause harm to the amenity of neighbouring uses, suggestin that access to services will not be adversely affected.

Other determinants considered in the HIA are anticipated to be subject to uncertain equality outcomes including Air Quality and Noise impacts which may be exacerbated by new employment-related development. However, mitigation proposed within the Draft Local Plan and as recommended in the HIA is considered to prevent the occurrence of adverse effects.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed Employment policies will have a positive impact on the protected characteristics below:

- Gender Reassignment;
- Religion or Belief;
- Race; and
- Sex.

This is because new employment and retail space is likely to benefit all groups through having a positive multiplier effect in encouraging new investment streams and providing new employment opportunities.

However, the below protected characteristics are considered to be subject to mixed effects:

- **Age/Disability/ Pregnancy and Maternity:** people with mobility impairments may be negatively affected if suitable accessibility measures are not delivered within new retail and employment developments. Residents who spend longer times at home (like the elderly) and live within the vicinity of employment destinations would also be greater exposed to construction impacts (i.e. increased transport) and operational impacts.
- **Socio-Economic Status:** The policies include no detail as to how employees will be employed and how equal opportunities will be made to ensure all groups are not deterred from applying for future positions in new employment developments. Those socio-economically deprived may also need to attain appropriate skills/qualifications to gain employment, depending on the nature of the roles created.

## 5.6 Social and Community Facilities/ Health and Wellbeing

**Summary of Health Impacts**

Overall, it is anticipated that the proposed social and community policies will have a positive impact on the below health determinants:

- **Air Quality and Noise:** Ensuring that development is well located, close to sustainable and active travel routes, is anticipated to reduce private vehicle movements, improving air quality. Additionally, ensuring HIAs are undertaken is anticipated to ensure that air quality and noise, and more specifically the impacts on human health, is considered within developments;
- **Housing:** The preservation and development of new community infrastructure that is well located, accessible by sustainable transport modes, may indirectly improve the quality of housing;
- **Social Cohesion and Community Safety and Access to Services:** The policies proposed should lead to the preservation of existing community facilities and improving access as well as developing new facilities. The development of such facilities may improve social cohesion and encourage those who are socially isolated to utilise facilities. New community facilities should also enhance feelings of safety through the use of passive surveillance;
- **Physical Activity:** Ensuring that development is well located, close to sustainable and active travel routes, is anticipated to encourage physical activity. Additionally, the

Health and Wellbeing policy encourages physical exercise and that developments include accessible open space; and

- **Green Infrastructure:** The Health and Wellbeing policy includes the requirement for developments to develop accessible open space, alongside vegetation and landscaping. This is anticipated to improve green infrastructure provision, improving physical and mental health and wellbeing.

Uncertain effects have been identified for Economy and Employment and Education and Skills. This has been identified as there is potential for local residents to take up new employment opportunities, but this will be dependent on the available skills in the resident population in the district. Similarly, it is unclear if new social and community infrastructure facilities will include education provision.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed social and community policies will benefit all protected characteristic groups:

These policies are anticipated to result in improvements to the accessibility open space and sports and recreation facilities, as well as free to access facilities such as open spaces. Not only does this improve access but also has potential to improve senses of community for a number of groups. Additionally, there are anticipated to be improvements to access of new health facilities, due to being well located, close to sustainable transport options and ensuring these spaces are accessible to all community members.

There is potential for safe walking and cycling routes to reduce fear of discrimination and improve feelings of safety. However, these effects are likely to be determined by individual scheme design.

## 5.7 Climate Change

**Summary of Health Impacts**

Overall, it is anticipated that the proposed climate change policies will have a positive impact on the below health determinants:

- **Air Quality:** The climate change policies require new development to minimise its carbon footprint and energy impact through sustainable design and construction practices;
- **Housing:** The climate change policies require new development sets out strict measures to ensure new housing is designed to high environmental and energy efficiency standards which will have beneficial effects in ensuring development is future proofed. The policies also encourage the decarbonisation of existing housing stock, which is particularly positive given a third of the district's emissions arise from existing buildings.
- **Social Cohesion and Community Safety:** Development will not be permitted in areas identified at being at risk of flooding, nor exacerbate the risk of flooding (taking into account future climate change allowances) which is positive in ensuring community safety, whilst reducing loss of property and stress/anxiety;
- **Access to Services:** The Climate-adapted Design and Construction policy explains that proposals should reduce greenhouse gas emissions by considering factors like site location. This implies that development which is well located and close to sustainable

and active travel routes will be advocated which in turn will increase service/amenity accessibility; and

- **Physical Activity:** As stated above, the Climate-adapted Design and Construction policy advocates development that is sustainably located, which will likely promote opportunities for physical activity where development is close to active travel routes and recreational assets, whilst reducing dependency on private car use.

Other determinants considered in the HIA are anticipated to be subject to uncertain equality outcomes, with the exception of the green infrastructure determinant which is considered to have uncertain equality outcomes. This is given that whilst the policy is not expected to cause harm to existing assets, there is a lack of detail as to how green infrastructure could be enhanced and secured by new development to address climate change.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed climate change policies will have a positive impact on the protected characteristics below:

- **Age/Disability/ Pregnancy and Maternity:** The delivery of net carbon zero buildings and infrastructure will reduce exposure to the cold and harmful emissions, which is beneficial to all groups, particularly children/younger and older persons, those with disabilities and those who are pregnant/in maternity who are more vulnerable to the effects of climate change;
- **Race:** Climate change mitigation and energy improvements as proposed can advance racial equity through improving living conditions for minority groups; and
- **Socio-economic Status:** The Flood Risk and Water Resources policy will ensure development does not exacerbate flood risk which is particularly positive for people that are subject to higher levels of socio-economic deprivation who are more often located in areas more vulnerable to higher flood risk. Those subject to socio-economic deprivation will also benefit from the other climate change policies which will promote energy efficiency improvements that will lower energy bills.

## 5.8 Green Belt

**Summary of Health Impacts**

Overall, it is anticipated that the proposed Green Belt policies will have a positive impact on the health determinants below:

- **Social Cohesion and Community Safety:** This policy contributes to preservation of Green Belt land, providing opportunities for improved access and therefore preserving opportunities for socialisation;
- **Access to Services:** It is anticipated that this policy will contribute to inclusively improving public access to the Green Belt, which is likely to benefit those groups who may have access limitations, particularly due to mobility constraints and affordability constraints; and
- **Physical Activity:** The preservation of Green Belt land and open countryside is anticipated to preserve opportunities for physical activity, allowing utilisation of these spaces for leisure and recreation.

Mixed effects have been identified for Green Infrastructure as the policy aims to protect the Green Belt against inappropriate development and enhance the landscape and biodiversity,

however, there is still potential for development of Green Belt land under this policy, resulting in a potential loss of green infrastructure.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed green belt policies will have a positive impact on the protected characteristics below:

- **Age:** Preserving Green Belt and open countryside is likely to benefit people of all ages, providing informal recreation space for children and young people;
- **Disability:** Preserving Green Belt and open countryside provides areas for mental health management and relieving stress, which may benefit those with disabilities or long term health conditions;
- **Pregnancy and Maternity:** Preserving Green Belt and open countryside is likely to benefit new and expectant parents providing informal recreational opportunities which in turn can improve physical and mental health and contribute to better birth outcomes; and
- **Socio-economic Status:** Green Belt land can provide people living in more deprived communities with access to informal open space.

## 5.9 Environment

**Summary of Health Impacts**

Overall, it is anticipated that the proposed environment policies will have a positive impact on the health determinants below:

- **Air Quality:** Development will not be permitted where it would have an adverse effect on air pollution levels, particularly within an Air Quality Management Area (AQMA). The Ground Conditions, Contamination and Pollution policy also requires a suitable assessment to be undertaken to assess impacts of new development (where adverse impacts are likely) to identify suitable mitigation measures;
- **Noise:** Development will not be permitted where it would have an unacceptable adverse impact on the indoor or outdoor acoustic environment and development is encouraged to be located away from noise sensitive receptors, such as residential areas. The Ground Conditions, Contamination and Pollution policy also requires a suitable assessment to be undertaken to assess impacts of new development (where adverse impacts are likely) to identify suitable mitigation measures; and
- **Social Cohesion and Community Safety:** The Ground Conditions, Contamination and Pollution policy encourages artificial lighting to improve local amenity, whilst highlighting buildings and open spaces of character which will improve the safety across the district.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed Green Belt policies will have a mixed impact on the protected characteristics below:

- Age;
- Disability; and
- Pregnancy/Maternity.

This is given the 'Ground Conditions, Contamination and Pollution' policy will ensure new development does not put residents and communities at risk of unacceptable levels of ground, air, water, light or noise pollution, odour, vibration, disturbance or land instability. This is beneficial to all groups, particularly children/younger and older persons, those with disabilities and those who are pregnant/in maternity given such groups are more susceptible to the health effects of pollution.

However, the above groups may be subject to mixed effects where accessibility provisions to ensure equal access to refuse and recycling facilities are not in place (such as locating collection points at reasonable distances from dwellings) under the Waste Management and Recycling policy.

## 5.10 Green Blue Infrastructure

**Summary of Health Impacts**

Overall, it is anticipated that the proposed green blue infrastructure policies will have a positive impact on the health determinants below:

- **Air Quality:** The community will benefit from new green and blue infrastructure as this contributes to reducing pollution, improving air quality, providing benefits to mental and physical health to residents in the district;
- **Noise:** The community will benefit from new green and blue infrastructure as this contributes to reducing pollution and screening noise, reducing disturbance and increasing levels of tranquility within the district;
- **Social Cohesion and Community Safety:** Preserving existing open spaces, as well as providing new open spaces and play spaces within the district is likely to improve social cohesion by providing areas which foster opportunities for socialisation. The Open Space, Play Space, Sport and Recreation policy also contributes to improving community safety as the policy requires proposals to be designed to minimise the potential for crime and antisocial behaviour;
- **Access to Services:** The policies within Green Blue Infrastructure are anticipated to improve access to open space and sports and recreation facilities through preserving existing facilities as well as providing new facilities;
- **Physical Activity:** These policies contribute to improving access to a greener urban landscape, benefitting people who may not have access to private gardens or outside space. Additionally, providing new open space and promoting the use of public rights of way and sustainable transport links between the green infrastructure network will encourage physical activity; and
- **Green Infrastructure:** These policies contribute to a greener landscape. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.

Uncertain effects have been identified for Economy and Employment as the development of new sports and recreation facilities has potential to provide additional employment opportunities. However, this is likely to be determined by the infrastructure that is developed and the available skills in the resident population across the district.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed green blue infrastructure policies will have a positive impact on the below protected characteristics:

- **Age:** Improvements to green and blue infrastructure is likely to result in benefits to young people and old people as this contributes to reducing pollution, improving air quality, providing benefits to mental and physical health. Additionally, providing green spaces and play spaces creates opportunities for physical activity and socialisation for children. The development of new green and blue infrastructure is required to be accessible and safe, improving safety for children utilising these spaces;
- **Disability:** Improvements to green and blue infrastructure is likely to result in benefits to disabled people as this contributes to reducing pollution, improving air quality, providing benefits to mental and physical health. The Green and Blue Infrastructure policy also requires new infrastructure to be accessible and safe, whilst the Open Space, Play Space and Recreation policy ensures the design of new open spaces and sports facilities is in line with Sports England and British Standards, improving accessibility to these spaces for disabled users. The biodiversity policy is likely to result in improvements to mental health due to the maintenance and enhancement of a nature;
- **Pregnancy and Maternity:** Providing green spaces and play spaces creates opportunities for physical activity and socialisation for children and parents. The development of new Green and Blue infrastructure is required to be accessible and safe, improving safety for children and parents utilising these spaces;
- **Socio-economic Status:** These policies contribute to improving access to open space, including national landscapes, by preserving existing open space and play space, as well as developing new public infrastructure. This is particularly beneficial to low income groups who may not have access to privately owned green space, or be able to afford private memberships to leisure facilities.

## 5.11 Design and Heritage

**Summary of Health Impacts**

Overall, it is anticipated that the proposed climate change policies will have a positive impact on the health determinants below:

- **Air Quality and Noise:** The Design and Heritage polices are supported by Appendix 4: Design Criteria that establishes detailed design requirements new development must achieve to ensure the quality of the built environment is maintained and enhanced which is anticipated to have a positive impact on air quality and noise (alongside the Environment policies);
- **Housing:** The Local Distinctiveness and Place Shaping policy includes requirements development must follow to ensure proposals are easy to navigate, whilst the Residential Design and Layout Policy and Appendix 4: Design Criteria sets out specific design criteria for residential development to ensure high design standards are achieved. Such provisions are beneficial in ensuring new housing is accessible and promotes opportunities for social interaction;
- **Social Cohesion and Community Safety:** The Design policies require development to be accessible which is positive in promoting opportunities to foster social cohesion. The

'Local Distinctiveness and Place Shaping policy also advocates community safety by including a specific section on Safety and Security' which is beneficial in ensuring residents can access and use communal spaces in a safe manner. In addition, the Heritage and Historic Environment policy also seeks to protect and enhance the district's heritage assets which will further advance social cohesion given that the historic environment brings 'social, cultural, economic and environmental' benefits to the community;

- **Physical Activity:** developments are required to inter alia ensure places, spaces and buildings are accessible to all potential users and provide appropriate levels of parking for cycles to support sustainable travel choices. This is particularly positive in ensuring physical activity is promoted within forthcoming applications across the plan area; and
- **Green Infrastructure:** The Local Distinctiveness and Place Shaping policy explicitly states that green infrastructure is one of several elements that is integral to sustainable design**,** suggestive green infrastructure will be delivered and enhanced as part of new development.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed design and heritage policies will benefit all protected characteristic groups:

These policies are anticipated to improve the design quality of new development particularly through creating a strong sense of place and ensuring residents have access to a highly accessible and safe environment and public realm. This is important in ensuring all groups, especially those who often more marginalised (such as different ethnicities and LGBTQ+ people) and people with disabilities/the elderly are able to access and feel safe and comfortable using public and communal spaces.

There is potential that large-scale/tall buildings could lead to social isolation, and as such, high quality communal open space and shared ground floor facilities must also be delivered

## 5.12 Transport and Connections

**Summary of Health Impacts**

Overall, it is anticipated that the proposed transport and connections policies will have a positive impact on the health determinants below:

- **Economy and Employment:** The Construction, Deliveries, Collections and Servicing policy seeks to support the deliveries and services that are essential to the economic growth of the district. Additionally, this policy has potential to result in employment opportunities, particularly during the construction of new developments;
- **Education and Skills:** Faster broadband will be beneficial for young people, especially students who require the utility for studying. High quality broadband may also provide opportunities for education and upskilling of adults within the district who may not be able to access education in their local area, as well as supporting flexible home working;
- **Social Cohesion and Community Safety:** Improved broadband connections and supporting car clubs will be beneficial to elderly people suffering from social isolation, providing greater opportunities to connect with family and friends, as well as providing access to facilities and services and fostering community relationships. Additionally, provisions of secure cycle parking are anticipated to reduce bicycle theft;

- **Access to Services:** The Waterways policy has potential to result in improved public access to high quality water spaces, whilst the Sustainable Transport and Travel policy ensures that developments are well connected to local facilities, improving accessibility for all groups, but particularly the elderly, disabled, low income groups and children, as well as those without access to private vehicles; and
- **Physical Activity:** Providing improved pedestrian networks and encouraging active travel is anticipated to encourage physical activity amongst the local population by providing higher quality walking and cycling routes.

Mixed effects have been identified for air quality and noise as there is potential for these policies to result in the encouragement of utilising sustainable vehicles, which is likely to reduce emissions from private vehicles, improving air quality and noise. However, there is potential for the construction of developments, as well as implementing parking within developments, to result in negative effects upon air quality and noise, due to encouraging private vehicle use, as well as construction emissions and noise, which could negatively affect vulnerable groups.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed transport policies will have a positive impact on the below protected characteristics:

- **Age:** Improvements to broadband infrastructure will be beneficial to elderly people suffering from social isolation, as well as benefitting young people, especially students. Improvements to the accessibility and safety of transport modes and ensuring that developments are well connected to local facilities, improves accessibility for the elderly, and children. Additionally, providing permeable site layouts may further improve accessibility for the elderly;
- **Disability:** Improvements to broadband infrastructure will be beneficial to disabled users, offering greater opportunities to connect with family and friends virtually. Improvements to the accessibility and safety of transport modes and ensuring that developments are well connected to local facilities is also likely to benefit disabled users. Additionally, providing permeable site layouts may further improve accessibility, particularly for the people with disabilities or long term health conditions;
- **Pregnancy and Maternity:** The Sustainable Transport and Travel policy which should provide improved cycle and walking routes to schools is also likely to benefit local children and those accompanying children to school; and
- **Socio-economic Status:** Improvements to broadband infrastructure will support work life balances for all social groups, particularly affecting those in more deprived communities. Additionally, if developed, car clubs can provide opportunities for those who do not own private vehicles. Improvements to secure cycle parking is likely to reduce bicycle theft and benefit those on low incomes, who's only accessible mode of transport is cycling. The Sustainable Transport and Travel policy is anticipated to improve the accessibility of multiple transport modes, ensuring that developments are well connected to local facilities, improving accessibility for those without access to private vehicles.

However, there are also uncertain effects identified for Age, Disability and Pregnancy and Maternity as a result of the Deliveries, Servicing and Construction policy as there is potential for the construction of developments to result in negative effects upon road diversions, air quality and noise, impacting these groups. Whilst this policy includes the implementation of a

Construction Environmental Management Plan (CEMP), this does not consider mitigation measures for all developments.

Additionally, mixed effects have been identified for Age, Disability and Pregnancy and Maternity as a result of the Parking policy. Whilst this policy supports parking safety improvements, and the potential for car club infrastructure, the implementation of electric vehicle charging can present barriers to the elderly, those with disabilities, and those with pushchairs through trailing cables, and parking bays being too narrow.

## 5.13 Other Policies (Northwood Headquarters (MOD))

**Summary of Health Impacts**

Overall, it is anticipated that the proposed employment policies will have a positive impact on the health determinants below:

- **Economy and Employment:** The Northwood Headquarters is key to the economy, acting as a major employer within the district and the policy encourages new employment opportunities to be secured for the local population; and
- **Education and Skills:** There is potential to secure education, skills and training opportunities as part of new employment related development at the site.

However, there is potential for negative effects concerning air quality and noise both during construction with respect to material transport and equipment emissions and during operation dependent on the nature of the activities proposed.

**Summary of Equality Impacts**

Overall, it is anticipated that the proposed Northwood Headquarters (MOD) policy will have a positive impact upon those who are subject to socio-economic deprivation and may be unemployed through new employment opportunities generated via new development.

However, the protected characteristics below are considered to be subject to mixed effects:

- Age;
- Disability; and
- Pregnancy and Maternity.

This is because the above groups, whom may be subject to mobility impairments could be disproportionately affected where an equal opportunity and working environment is not provided (e.g. via implementing appropriate accessibility provisions). Moreover, such groups are likely to spend longer periods of time at home (compared to those economically active) and thus be greater exposed to construction and operational impacts of new developments, particularly those that live in the vicinity of the site.

# 6.0 Mitigation, Enhancements and Recommendations

Mitigation and enhancement measures outlined within the HIA and EqIA are summarised in Table 6-1 below. These include measures for changes in policy wording as well as measures to be taken forward through policy implementation.

**Table 6-1: Mitigation and Enhancement Measures**

| Source Assessment | Policy Group/Policy | Mitigation/Enhancement Measures |
|---|---|---|
| HIA | Spatial Strategy | • Greater context should be included as to how the acute affordable housing and specialist accommodation needs are addressed across the district (with reference to the 'Sustainable Development' policies).<br>• Where possible, employment opportunities should seek to provide employment to the local population in the first instance.<br>• The Infrastructure Delivery Plan (IDP) should be updated to reflect the current socio-economic/health profile across the Three Rivers District.<br>• Development in' washed-over Green Belt villages' should be supported by the appropriate services to meet resident needs. |
| EqIA | Spatial Strategy | • Greater context should be included as to how TRDC's acute affordable housing and specialist accommodation needs will be delivered.<br>• Mitigation should be imposed to ascertain that large-scale/tall buildings include appropriate accessibility features for the elderly and for those who are disabled and have mobility impairments. |
| HIA | Sustainable Development<br>Employment | • Additional mitigation could be offered by the consideration of Dust Management Plans (DMP) which should be undertaken prior to demolition and construction of new sites. Consideration should also be given to energy-efficient and electric or hybrid machinery.<br>• Additional mitigation could be offered by the consideration of a Construction Environmental Management Plan (CEMP) should be compiled prior to demolition and construction of new sites. Consideration should also be given to ensuring noise buffering at the site. |
| HIA | Sustainable Development<br>Social and Community | • Further assessment as part of scheme design, could be undertaken to evaluate the provision of existing facilities and ensure that supply is sufficient to support new communities. |

| Source Assessment | Policy Group/Policy | Mitigation/Enhancement Measures |
|---|---|---|
| EqIA | Sustainable Development | • Should any additional accommodation be required as a result of improvements to the existing site the council will need to consider appropriate locations for this to avoid illegal sitings for Gypsy, Travellers and Showpeople. |
| HIA | Employment<br>Green Blue Infrastructure<br>Social and Community<br>Other (Northwood Headquarters (MOD)) | • New employment opportunities should seek to provide employment to the local population in the first instance and provide equal opportunities for all groups to apply from future employment positions. |
| HIA | Employment | • The retail policy could be expanded town allow for more creative solutions to ensure town centre viability. |
| EqIA | Employment – Retail | • The policy should include greater context on town centre viability, particularly in more deprived areas. The policy should also do more to encourage new retail development to include accessibility measures. |
| EqIA | Employment – Warner Brothers Allocation | • Consideration should be given to how equal opportunities will be made for all groups applying for future employment positions at the site. Mitigation should also be imposed to ensure development at the site does not give rise to adverse impacts during construction and operation (although this is likely to be covered by the Ground Conditions, Contamination and Pollution section of the Draft Local Plan). |
| EqIA | Employment – Employment and Economic Development | • New employment development could be encouraged along major public transport routes to increase accessibility to employment destinations. |
| EqIA | Social and Community<br>Transport | • Where possible, walking and cycling routes should be designed to incorporate designing out crime principles, including being well lit, and provide clear sightlines.<br>• Active travel infrastructure should be accessible and inclusive.<br>• Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.<br>• Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users. |

| Source Assessment | Policy Group/Policy | Mitigation/Enhancement Measures |
|---|---|---|
| | | • Community infrastructure services should aim to provide a range of services across the district, including spaces that can be utilised for support groups or cultural activities. Community engagement should be undertaken to identify the needs of both the new and existing communities. |
| HIA | Climate Change | • Where possible, opportunities to promote active travel should be encouraged within the climate change policies.<br>• Where possible, the climate change policies would benefit from greater context on specific green infrastructure measures/strategies that should be secured by new development to address climate change. |
| EqIA | Climate Change – Embodied Carbon and Minimising Waste | • Major development should be subject to a Whole Life Carbon Assessment to ensure embodied carbon is reported and assessed. |
| EqIA | Climate Change – Reducing Carbon Emissions in Existing Buildings | • Subsides to facilitate low-income groups in undertaking retrofitting should be considered. |
| HIA<br>EqIA | Green Belt | • Access to the Green Belt and wider countryside should be accessible for all groups inclusively.<br>• Development located within the Green Belt should include additional green infrastructure provision and provide open space within development. |
| HIA | Environment | • Air quality and noise assessments should support development where there is potential for adverse impacts to identify mitigation. |
| EqIA | Environment – Waste Management and Recycling | • Provision of refuse and recycling facilities and collection points should be situated in locations that are accessible for those with mobility disabilities and be within a reasonable distance from dwellings. Features such as ramps and raised pavements should be considered within specialist housing/homes for older persons; and |
| EqIA | Environment – Ground Conditions, Contamination and Pollution | • The mitigation identified in the technical assessments (waste, ground conditions, air quality, noise and vibration and lighting) supporting development proposals should be implemented to ensure all groups are not exposed to unacceptable levels of pollution. |
| EqIA | Green Blue Infrastructure | • New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility. Accessible surfacing should be |

| Source Assessment | Policy Group/Policy | Mitigation/Enhancement Measures |
|---|---|---|
| | | considered for mobility aid users and people with mobility restrictions. Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.<br>• Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the district.<br>• Enhancements to public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used. |
| HIA | Design and Heritage | • Mitigation should be imposed to ascertain that large-scale/tall buildings include appropriate accessibility features for the elderly and for those who are disabled and have mobility impairments.<br>• High quality communal open space and shared ground floor facilities must also be delivered alongside tall buildings, such that residents are not subjected to social isolation;<br>• The Residential Design and Layout Policy would benefit from greater detail as to how those with accessibility issues will be considered in the design of new developments such as through requiring proposals to comply with The Building Regulations (2010) standards (Part M);<br>• Local services should be integrated into large-scale development to meet local needs and address any deficiencies. The polies could be clearer on the type and nature of services that should be delivered within residential-led mixed-use development. |
| EqIA | Design and Heritage - Advertisements | • Whilst not a planning matter, advertisements and signs should be encouraged to be appropriate and to not include harmful and offensive content through a permissive policy approach. |
| EqIA | Design and Heritage - Residential Design and Layout | • Mitigation should be imposed to ascertain that large-scale/tall buildings include appropriate accessibility features for the elderly and for those who are disabled and have mobility impairments. High quality communal open space and shared ground floor facilities must also be delivered alongside tall buildings, such that residents are not subjected to social isolation.<br>• Local services should be integrated into large-scale development to meet local needs and address any deficiencies, and the policies could be clearer on the type and nature of services that should be delivered within residential-led mixed-use development. |
| HIA | Transport | • The policy wording could also be expanded to ensure that any construction resulting in negative effects upon air quality should be appropriately mitigated within the CEMP.<br>• The policy wording could also be expanded to ensure that any construction resulting in negative effects from noise should be appropriately mitigated within the CEMP. |

| Source Assessment | Policy Group/Policy | Mitigation/Enhancement Measures |
|---|---|---|
| EqIA | Transport | • Those living in social housing should be made aware of government-backed social tariffs for broadband, aiding in improving broadband connections for these communities.<br>• The policy could be expanded to ensure that developments requiring routing changes communicate changes to the local community in advance of works, as well as ensuring diversion routes do not cause undue confusion amongst road users.<br>• The policy could also be expanded to ensure that any construction resulting in negative effects upon air quality and noise should be appropriately mitigated<br>• Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.<br>• EV charging points should adhere to the British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022).<br>• Consideration should be made for removing other barriers to active travel for disabled people, such as affordability. The Council should work with charities and other representative groups to help lower the cost of adapted cycles. It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters.<br>• In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that residents are not required to walk more than 400 metres from their home as per the Governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. |
| HIA | Other (Northwood Headquarters (MOD)) | • The policy would benefit from context on the type services and facilities to be delivered at the site, particularly in relation to local needs and any deficiencies. |
| EqIA | Other - (Northwood Headquarters (MOD)) | • Consideration should be given to how equal opportunities will be made for all groups applying for future employment positions at the site. |

# 7.0 Next Steps

This report will be consulted on alongside the SA, HRA and Local Plan as part of the Regulation 19 consultation. In addition, given the nature of the IHEIA engagement with a number of different stakeholders will be undertaken to ensure that the assessment and mitigation measures are appropriate and correctly reflects the views of a variety of groups. The stakeholders identified for further engagement include:

- Hertfordshire and West Essex Integrated Care System;
- Hertfordshire's Citizens Panel;
- Three River's Local Strategic Partnership Board Members (such as Watford and Three Rivers Trust, Herts Mind Network);
- NHS Hertfordshire Community;
- Charity groups such as Age UK and the Royal National Institute of Blind People;
- Herts Interfaith Forum;
- Trans Unite;
- Three Rivers Youth Council (including the Youth Council for young people special educational needs and disabilities); and
- Community groups.

Following Regulation 19 consultation, any changes made to the Local Plan will be re-assessed within the IHEIA.

# Appendix A Baseline Information

## Three Rivers District Council Local Plan

### Integrated Health and Equality Impact Assessment

**Three Rivers District Council**

SLR Project No.: 430.000113

16 January 2026

## Population

In 2021, the estimated population of Three Rivers District was 93,800. There has been a population increase since 2011 of 7.4%. This is similar to the growth experienced in the East of England (7.4%), and higher than the average growth experienced nationally (6.6%)[45]. The latest population density estimate is approximately 1,060 persons per $km^2$, an increase from 1,010 persons per $km^2$ in 2011. Projections from 2018 suggest that the population in Three Rivers is expected to reach 94,120 by 2043. This projection may now be higher/lower, however no recent projections have been made.

There has been an increase in the number of families present in the district since 2011; households with dependent and non-dependent children now make up for 33.3% of households, compared to 31.2% in 2011. This suggests that a growing proportion of the population is young families[46]. However, the average household size is expected to decrease by 2039, due to a rise in the number of one person households.

## Age

In 2021, 17,000 (18.1%) of Three River's residents were aged 65 years and over. Since 2011, the number of residents falling into this age bracket has increased by 1.3% (16.8%)[47]. By 2041, it is predicted that 24.2% of residents will be aged 65 or older[48]. In 2021, 17,600 (18.8%) of residents were aged 15 years and under. Since 2011, the number of residents falling into this age bracket has decreased by 1.2% (20%). In 2041, it is predicted that 17.5% will be aged 15 or younger[49], a further reduction. This therefore suggests that the district has an ageing population, and a declining birth rate.

These figures suggest that by 2041, a relatively large proportion of the population (41.7%) will be non-working dependents. This is likely to impact infrastructure needs in the district, with further pressure being created for the provision of suitable housing, as well as healthcare places. Radical changes to health and social care systems will be needed in order to provide appropriate care for the ageing population[50].

Figure A-2 highlights the predicted age range of Three River's population in 2041.

## Marriage and Civil Partnership

Since 2011, there has been a slight increase (2.3%) in the percentage of people aged 16 and over who have never been married/in a civil partnership; this accounts for 32.4% of Three River's adult population. However, the percentage of people who are married/in a civil partnership is higher than those who aren't (52.0%)[51].

[45] Three Rivers population change, Census 2021 – ONS (Accessed 13/06/24)

[46] Family in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 13/06/24)

[47] Median Age in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 13/06/24)

[48] Population projections – local authorities: SNPP Z1 - Office for National Statistics (Accessed 05/07/23)

[49] Population projections – local authorities: SNPP Z1 - Office for National Statistics (Accessed 05/07/23)

[50] Ready for Ageing? Microsoft Word - FINAL Public Services Report (parliament.uk) (Accessed 05/09/23)

[51] Marriage and civil partnership in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 13/06/24)

## Gender

In 2021, the estimated female population of Three Rivers District was 48,121 and the male population 45,650[52]. By 2043, the female population is estimated to decrease to 47,656 and the male population is estimated to increase to 46,464[53]. Predicted gender split by age can be seen in Figure A-2 for 2041.

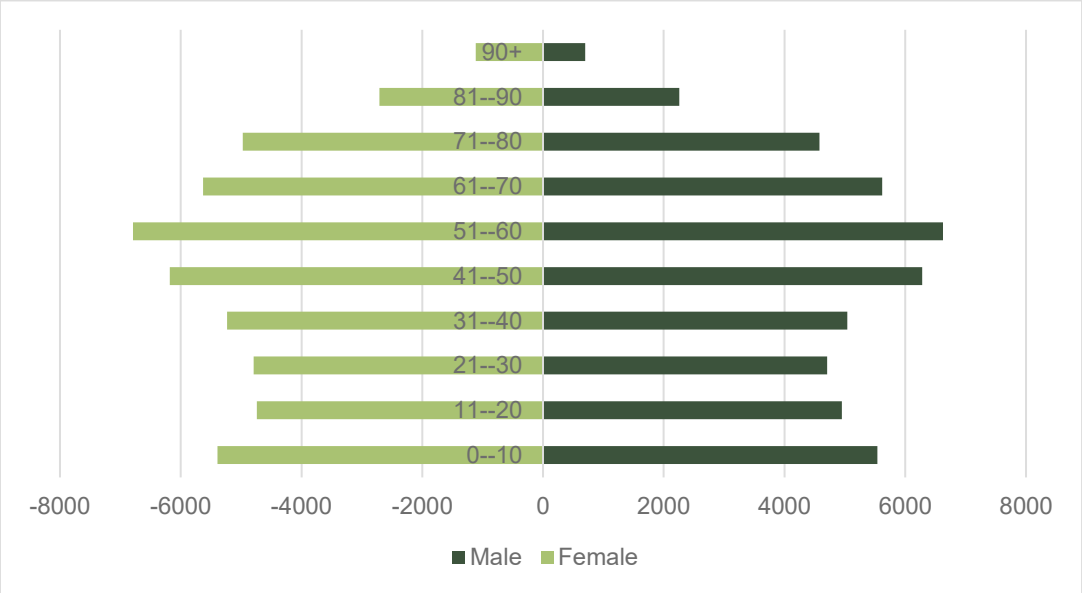



**Figure A-2: 2041 Gender Predictions in Three Rivers, Split by Age Category (Source: ONS 2018- Population Projections for Local Authorities)**

## Sexual Orientation

The 2021 Census recorded sexual orientation in Three Rivers District for the first time. In total, 1.89% of residents stated that they belonged to the LGBTQ+ community, and 91.5% of residents regarded themselves as heterosexual[54]. This is slightly higher than the national average of 89.4% and regional average of 90.2%.

## Ethnicity

The district is more ethnically diverse than the national average. In the 2021 Census, over 15.2% of District residents identified themselves as Asian, Asian British or Asian Welsh (compared to 9.3% national), 77.1% identified as White (compared to 81.7% nationally), and 2.4% identified themselves as Black, Black British, Black Welsh, Caribbean or African (compared to 4.0%

[52] Sex - Office for National Statistics (ons.gov.uk) (Accessed 13/06/24)

[53] Population Projections for Local Authorities https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2 (Accessed 13/06/24)

[54] Sexual orientation, England and Wales - Office for National Statistics (ons.gov.uk) (Accessed 13/06/24)

nationally). The remaining residents identified themselves as being mixed or multiple ethic groups, or 'other'[55].

Table A-1 highlights the 2021 ethnic group populations for Three Rivers residents by ward[56]. Statistics have been bolded, where they are above the national average. This table shows that the district has a higher Asian population, most notably in the ward of Moor Park and Eastbury where they make up over the half of the total population.

**Table A-1: Ethnic Group Populations by Ward (2021)**

| Ward | White | Asian | Mixed | Black | Other |
|---|---|---|---|---|---|
| Abbots Langley and Bedmond | **90.4%** | 4.6% | **3.0%** | 1.3% | 0.7% |
| Carpenders Park | 69.4% | **22.6%** | 2.8% | 2.5% | **2.7%** |
| Chorleywood North and Sarratt | 71.6% | **21.6%** | **3.4%** | 1.7% | 1.7% |
| Chorleywood South and Maple Cross | **86.3%** | 7.2% | **4.1%** | 1.0% | 1.4% |
| Dickinsons | 79.0% | **13.9%** | **3.9%** | 1.7% | 1.4% |
| Durrants | **83.9%** | **10.5%** | **3.1%** | 1.2% | 1.3% |
| Gade Valley | **86.2%** | 5.5% | **4.0%** | 3.0% | 1.4% |
| Leavesden | 74.1% | **15.4%** | **4.2%** | **4.6%** | 1.6% |
| Moor Park and Eastbury | 41.1% | **50.1%** | **3.4%** | 2.3% | 3.1% |
| Oxhey Hall and Hayling | 76.2% | **15.1%** | **3.5%** | 3.3% | 1.9% |
| Penn and Mill End | **83.3%** | **10.0%** | **4.1%** | 1.3% | 1.2% |
| Rickmansworth Town | **82.3%** | **11.2%** | **3.6%** | 1.5% | 1.4% |
| South Oxhey | 74.3% | **15.3%** | **3.5%** | **4.9%** | 2.0% |
| **Total** | 72,316 | 14,265 | 3,390 | 2,233 | 1,568 |
| **%** | 77.1 | 15.2 | 3.6 | 2.4 | 1.7 |

The 'other' category covers Gypsies and Travellers. The 2021 census identified 3,325 Gypsy Roma and Travellers in Hertfordshire with 176 identified in the district[57]. However, it is anticipated that this number could be much higher.

## Religion/Belief

There are a number of different religions and beliefs present across the district. The 2021 Census recorded 63.6% of Three Rivers' population holding some form of religion/belief. The most prominent religion held is Christianity (47.6%), followed by Hinduism (8.3%), Islam (3.7%), Judaism (1.6%), and Buddhism (0.5%). Over a 3/10 of the district hold no religion or belief system however, with this statistic increasing by 8% since 2011. The percentage of residents defining

[55] Ethnic Groups in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 13/06/24)

[56] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[57] Working with Gypsy, Roma & Travellers in Hertfordshire, 2023 | GATE Herts

themselves as Muslim has increased the most since 2011, with a growth of 3.8%. In contrast, the percentage of residents defining themselves as Christian has declined by 12.3% since 2011[58].

### Disability

In 2021, 5.2% of residents identified themselves as 'disabled and limited a lot', and 8.6% identified themselves as 'disabled and limited a little'. Both of these figures have decreased since 2011. The percentage of residents considering themselves as 'disabled and limited a lot' is lower than the Hertfordshire average (6.6%) and the England average (7.5)[59].

The number of residents living with a disability can also be viewed spatially. The wards South Oxhey (17.9%), Carpenders Park (18.9%), and Abbots Langley and Bedmond (17.4%) have the highest recorded rates of residents living with a limiting long term illness or disability[60].

As the number of residents over 65 years of age increases in Three Rivers, there is likely to be a rise in the number of people living with long term conditions and disabilities. As a result, there is likely to be an increased need for social care services as older people become the main Adult Social Care service users. There is also a need to provide housing (new and existing) that are built to regulation accessible and adaptable standards, so that the elderly can live comfortably and independently for longer.

## Pregnancy and Maternity

In 2022, there were 828 live births in Three Rivers. This was slightly lower than the UK average of 11.8 live births per 1,000 population[61]. The conception rate for under 18's in Three Rivers is 7.0 per 1,000[62]. Over time, infant, neonatal and perinatal mortality rates have decreased, and infant mortality rates are now considered average, at 2.9 deaths per 1,000[63].

## Deprivation

The English Indices of Multiple Deprivation (IMD) 2025 measures the broad concept of multiple deprivation at the small area level. The Indices provide a set of relative measures of deprivation for small areas (LSOAs (Lower Super Output Areas))[64] across England, based on seven different domains of deprivation:

- Income Deprivation;
- Employment Deprivation;
- Education, Skills and Training Deprivation;
- Health Deprivation and Disability;

[58] Religion in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 13/06/24)

[59] Disability in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 14/06/24)

[60] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 14/06/24)

[61] Births by mother's usual area of residence in the UK. Births by mothers' usual area of residence in the UK - Office for National Statistics (ons.gov.uk) (Accessed 11/07/23)

[62] Local Authority Health Profiles- Child Health. Local Authority Health Profiles - Data - OHID (phe.org.uk) (Accessed 14/06/24)

[63] Infant Mortality Rates Local Authority Health Profiles - Data - OHID (phe.org.uk) (Accessed 14/06/24)

[64] LSOAs are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.

- Crime;
- Barriers to Housing and Services; and
- Living Environment Deprivation.

According to the 2025 Indices, Three Rivers is ranked 275th out of 317 English local authorities nationally (where 1 is the most deprived and 317 is the least deprived) placing it amongst the top 20% of least deprived local authorities nationally[65].

Table A-2shows the average rank of each of the districts surrounding Three Rivers[66].

**Table A-2: IMD Rankings Per Domain**

| Local Authority | Overall Rank | Income | Employment | Education | Health | Crime | Housing | Environment |
|---|---|---|---|---|---|---|---|---|
| **Three Rivers** | **275** | **257** | **258** | **265** | **267** | **248** | **201** | **248** |
| Hertsmere | 214 | 164 | 187 | 225 | 205 | 168 | 198 | 184 |
| Watford | 175 | 111 | 194 | 201 | 194 | 144 | 174 | 95 |
| St Albans | 288 | 269 | 272 | 292 | 274 | 260 | 285 | 213 |

*Source: Ministry of Housing, Communities and Local Government 2019- English Indices of Deprivation 2025*

As shown in Table A-2, housing has the lowest rank of deprivation for the district. This sub-domain measures the physical and financial accessibility of housing and services. This therefore suggests that there is poor access to services and housing across the district. The highest domain ranks are for employment, education and health, indicating that the district has good access to services and opportunities.

Levels of deprivation can be considered spatially. Clusters of high deprivation exist to the North and South/South-East of the District, whereas clusters of low deprivation exist to within the Centre and to the South of the District. Overall, the most deprived ward is South Oxhey found in the South of the District. The least deprived ward is Dickinsons, found in the Centre/East of the District. Residents in the most deprived areas of the district- such as South Oxhey- are more likely to be renting (including high concentrations of social housing), have fewer education and employment opportunities, experience greater barriers to accessing services and have lower household incomes than in other parts of the district[67].

In 2019, it was estimated that 9.2% of children and 8.7% of older people in the district were living in poverty. Levels of poverty vary spatially across the district, with the most deprived ward (South Oxhey) holding the highest levels of poverty for both children and older people (18% and 22%

[65] English indices of deprivation 2019 - GOV.UK (www.gov.uk) (Accessed 13/06/24)

[66] English indices of deprivation 2019 - GOV.UK (www.gov.uk) (Accessed 13/06/24)

[67] Housing, Homelessness & Rough Sleeping Strategy 2023-2028 appendix 1 - Housing Homelessness And Rough Sleeping Strategy 2023-2028 optimised.pdf (threerivers.gov.uk) (Accessed 14/06/24)

respectively), and one of the least deprived wards (Durrants) holding some of the lowest levels of poverty for both children and older people (3.9% and 5.8% respectively)[68].

It is estimated that 10.9% of households in the district are living in fuel poverty. This varies spatially; however, the most deprived ward in the District (South Oxhey) holds 16.7% of households in fuel poverty, whereas one of the least deprived wards (Moor Park and Eastbury) holds 7.5% of households in fuel poverty[69].

## Care Leavers

And independent review of Children's Social Care was published in 2022[70], which set out evidence for the need for care levers to be a protected characteristic – '*Many care experienced people face discrimination, stigma, and prejudice in their day to day lives. Public perceptions of care experience centre on the idea that children are irredeemably damaged and that can lead to discrimination and assumptions being made*'.

Children and young people who grow up in care are up to four times more likely to suffer poor health 30 years later than those who grew up with their parents[71]. It should, however, be noted that children in care or who have grown up in care, are not a homogenous group, with many experiencing additional difficulties due to their background and/ or characteristics.

The NHS Long Term Plan[72] recognised the impact that "*the most vulnerable children, who need extra help from the state to safeguard their wellbeing, do not reliably get the support or access to the services that their needs demand. This results in poorer health outcomes, particularly for care leavers.*"

In 2023, there were 239 care leavers aged between 17 and 18 in Hertfordshire and 536 aged between 19 and 21[73]. Whilst these numbers are small, it represents the second highest number of care leavers in the region, making up 18.7% and 15.3% of the East England total.

Currently children in care services do not routinely extend to care leavers, and this period of transition can be a time of vulnerability and uncertainty. Health assessments cease at the age of 18 and there is no further specific follow up by health. In Hertfordshire, the Council have a Care Leavers Pledge, which aims to support those aged between 18-25, support gain access to healthcare and counselling services, housing and mentoring support.

In the UK the number of looked after children has increased by 8% over the past five years[74]. Children in care are more likely to be in care if they are male (making up 57% of children in care) or black or of mixed ethnicity (making up 17.6% of children in care)[74].

The number of children in care is increasing nationally, which will lead to an increase in the number of care leavers requiring additional support, such as access to healthcare, employment, further education and housing.

[68] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

[69] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

[70] J McCallister, The Independent Review of Children's Social Care, 2022

[71] Murray, E et al. Non-parental care in childhood and health up to 30 years later: ONS Longitudinal Study 1971-2011. European Journal of Public Health. 2020: 30: 6: 1121-1127.

[72] NHS, The NHS Long Term Plan, 2019

[73] ONS, Children looked after in England including adoptions, 2023

[74] NSPCC, Statistics Briefing: Children in Care, 2024

### Life Expectancy

In 2022, life expectancy for males in the district was estimated to be 82.5 years, whilst life expectancy for females in the district was estimated to be 85.7 years. These statistics are better than the Hertfordshire and England-wide life expectancy, as highlighted in Table A-3[75].

**Table A-3: Predicted Life Expectancies**

| | Three Rivers | Hertfordshire | England |
|---|---|---|---|
| Males (2022) | 82.5 | 80.9 | 79.3 |
| Females (2022) | 85.7 | 84.2 | 83.2 |

*Source: Public Health England 2024- Local Authority Health Profiles*

Life expectancy varies by ward and is highly linked to deprivation. Life expectancy is 7.2 years lower for men and 5.1 years lower for women in the most deprived wards of Three Rivers than in the least deprived wards[76]. South Oxhey holds particularly low life expectancies for residents, compared to Durrants.

When considering healthy life expectancy (HLE)- how long a person can expect to live in full health, without being hampered by disabling illnesses or injuries- females in the district have a higher healthy life expectancy than men[77]. As shown in Table A-4, HLE in Three Rivers is slightly higher than the Hertfordshire average, and significantly higher than the national average.

**Table A-4: Predicted Healthy Life Expectancy**

| | Three Rivers | Hertfordshire | England |
|---|---|---|---|
| Males (2018-2022) | 69.5 | 68.4 | 63.1 |
| Females (2018-2022) | 70.9 | 69.7 | 63.9 |

*Source: Hertfordshire and West Essex District Profile 2024- Three Rivers*

HLE also varies by ward. Oxhey Hall and Hayling holds significantly worse HLE than the Three Rivers average (HLE for males is 66.6 and HLE for females is 67), whereas Durrants holds significantly better HLE than the Three Rivers average (HLE for males is 74.1and HLE for females is 74.7)[78].

## General Health

The majority of Three Rivers residents define their health as either ‘very good’ (52.8%) or ‘good’ (32.9%) according to the 2021 Census. Only 3.6% of resident’s deemed themselves to be ‘bad’ or ‘very bad’ health[79]. 57.3% of cancer cases in the district are diagnosed at stage 1 or 2[80].

[75] Life Expectancy at Birth. Local Authority Health Profiles - Data - OHID (phe.org.uk)https://fingertips.phe.org.uk/profile/health-profiles/data (Accessed 13/06/24)

[76] Equalities Duty Information Report (threerivers.gov.uk) (Accessed 17/06/24)

[77] Hertfordshire & West Essex District Profile 2024 Three Rivers Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 13/06/24)

[78] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

[79] Health in Three Rivers How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 13/06/24)

[80] Injuries and ill health Local Authority Health Profiles - Data - OHID (phe.org.uk)https://fingertips.phe.org.uk/profile/health-profiles/data (Accessed 24/06/24)

Tobacco and substance misuse can increase the risk of physical and mental health conditions[81]. In 2022, 7.8% of adults in the district smoked, a 4.5% reduction since 2019. This is also lower than the England average (12.7%). The district has implemented a lung cancer prevention project within local GP surgeries, offering a health and wellbeing survey to GP patients listed as smokers. The survey identifies health improvement priorities for the patient and ensures referral and access to local services[82].

In 2021/22, 2.8% of GP patients in Three Rivers had coronary heart disease; this is higher than the Hertfordshire average (2.6%) but significantly lower than England average (3.0%). In 2021/22, the prevalence of stroke in Three Rivers was 1.7%, which was higher than the Hertfordshire average (1.6%) but lower than the England average (1.8%). Cardiovascular disease (CVD) is more prevalent in males, those living in the most deprived areas, individuals over the age of 50, and some ethnic minority groups (e.g. Asian groups have higher mortality rates for heart disease)[83]. In 2017 the mortality rate from CVD was 3.7 times higher for males and 4.5 times higher for females living in the most deprived areas compared to males and females living in the least deprived areas[84]. In 2020/21, 6.1% of residents in Hertfordshire had diabetes[85].

### Cancer

In 2020, the proportion of cancers in Three Rivers diagnosed at stages 1 or 2 was 52%. Screening coverage for breast cancer was 52.9% in Three Rivers in 2022, a significant decrease from 2021 and lower than the Hertfordshire and England averages (56.4% and 64.9% respectively). Screening coverage for bowel cancer was 69.3% in Three Rivers in 2022, a significant increase from 2021 but lower than the Hertfordshire and England averages (71.9% and 70.3% respectively)[86].

Between 2017-2019, Three Rivers District observed a mortality rate for under 75s from cancer of 95.2 per 100,000. This result was less than the Hertfordshire and the England average[87]. Between 2017-2019, cancer causes of death were significantly higher for females in Three Rivers' (24.4%), than males (13.7%)[88].

### Obesity and Levels of Activity

Physical activity is vital to health, as it helps to protect against multiple physical and mental illnesses, including Type 2 diabetes, depression and stroke.

Three Rivers is classed as the fifth most active area in Hertfordshire. In total, 64.7% of adults are considered active (150 minutes or more of activity a week), marginally above the Hertfordshire average (63.1%) and above the England average (61.3%). However, 21.8% of adults are considered as inactive (less than 30 minutes of activity a week)[89]. This inactivity is likely to have

[81] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[82] Equalities Duty Information Report (threerivers.gov.uk) (Accessed 17/06/24)

[83] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[84] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[85] Diabetes JSNA 2022 https://www.hertshealthevidence.org/microsites/jsna/jsna-documents/diabetes-jsna-2022.pdf (Accessed 7/1/25)

[86] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[87] Local Authority Health Profiles - Data - OHID (phe.org.uk) (Accessed 05/08/24)

[88] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

[89] Sport and Physical Activity Strategy 2022-2025 "Active People, Active Places, Active Together" (threerivers.gov.uk) (Accessed 21/06/24)

contributed to 62.9% of adults in the district being classed as overweight or obese[90]. This is similar to the Hertfordshire average (62.0%), and the England average (63.5%) however.

In total, 52.9% of children are considered active (60 minutes or more of activity per day), and 25.4% of children are considered inactive (less than 30 minutes of activity per day)[91]. This inactivity is likely to have contributed to 29.8% of 10–11-year-olds in the district being classed as overweight or obese[92]. This is lower than the Hertfordshire average (31.7%), and the England average (37.8%) however.

Deprivation is likely to influence levels of activity and therefore obesity rates within the district. 87% of residents in the most affluent ward of Three Rivers are found to carry out at least an hour of moderate intensity physical activity a week compared to 61% in the least affluent ward[93]. This is supported by data that shows that 38% of primary school children in South Oxhey (one of Three Rivers most deprived wards) leave school overweight, compared to 29.7% of primary school children in other wards[94].

The Three Rivers Sport and Physical Activity Strategy 2022-2025 aims to increase the level of physical activity carried out by residents, leading to a reduction in health inequalities and preventable illness and disease. The strategy also aims to reduce inequalities in sports and physical activity by targeting under-represented groups in particular women and girls, older adults and those with a long-term health condition[95].

Transport provision, particularly active travel routes, has an important role in tackling health issues such as obesity and in improving overall quality of life. The Hertfordshire Local Transport Plan (2018-2031) includes policies for increasing active travel through walking and cycling. There are currently a number of cycle routes within the District, including the Ebury Way, a 3.5 mile (5.6km) traffic free section of route 6/61 of the National Cycle Network.

Obesity is more prevalent among ethnic minority groups (e.g.: Black residents), men and residents in deprived areas[96].

### Mental Health

The estimated prevalence of Common Mental Disorders in Three Rivers is 12.9%; this is similar to the Hertfordshire average (14.0%) but significantly lower than the England average (17.0%). Self-harm and suicide rates have decreased over time in the district; however cases of self-harm are most common in females, and cases of suicide most common in males[97]. Between 2017-2019, mental and behavioural causes of death were higher for females in Three River's (14.3%), than males (6.5%)[98].

[90] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[91] Sport and Physical Activity Strategy 2022-2025 "Active People, Active Places, Active Together" (threerivers.gov.uk) (Accessed 21/06/24)

[92] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[93] Sport and Physical Activity Strategy 2022-2025 "Active People, Active Places, Active Together" (threerivers.gov.uk) (Accessed 21/06/24)

[94] Microsoft Word - TCPA report for Three Rivers 30.4.20.docx (Accessed 21/06/24)

[95] Sport and Physical Activity Strategy 2022-2025 "Active People, Active Places, Active Together" (threerivers.gov.uk) (Accessed 24/06/24)

[96] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[97] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[98] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

Poor mental health has been linked to isolation and loneliness, especially in the elderly. South Oxhey has one of the highest risks of loneliness and Moor Park and Eastbury has one of the lowest risks of loneliness[99]. Many Hertfordshire residents- particularly those with pre-existing mental health issues- have also reported that the cost-of-living crisis has worsened their mental health[100]. This is linked to financial stress leading to social isolation[101].

A number of projects and initiatives are in place across the district, to support residents with mental health issues. The Three Rivers Community Support Service, part funded by TDRC, supports residents with their mental wellbeing needs through proactive outreach. In 2022/23 the service supported 478 people, an increase of 27% residents in comparison to 2021/22. Additionally, a football based mental wellbeing project- "Man On"- has been implemented in the district, designed to support men aged 18+ with their mental health through physical activity and a conversation café. This has been running since March 2023 in William Penn Leisure Centre, Mill End. The initiative "Arts on Prescription" provides a creative outlet for adults with mild to moderate mental health issues/poor wellbeing, to learn new skills and develop their creativity within a small group[102].

### Frailty and Dementia

Frailty, characterised by a decline in functioning across multiple organ systems, is emerging as a global health burden, with it being associated with a greater risk of adverse outcomes including falls and fractures, admissions to long-term care, and premature mortality[103].

The rate of hospital admissions for falls in Three Rivers was 2,568 per 100,000 for residents aged 65+ and 6,525 per 100,000 for residents aged 80+ in 2021/22. These figures are significantly higher than both the Hertfordshire and England averages. The rate of hip fractures in Three Rivers was 533 per 100,000 for residents aged 65+ and 1,365 per 100,000 for residents aged 80+ in 2021/22. These figures are similar to the Hertfordshire and England averages[104].

Frailty is more common among women and residents in deprived areas[105].

An estimated 14,838 of Hertfordshire's population are living with dementia[106]. Within Three Rivers, this accounts to an estimated dementia diagnosis rate of 52.3%[107].

The ageing population in Three Rivers will likely increase the burden of age-related conditions such as falls, hip fractures and dementia.

[99] Three Rivers Local Authority (ageuk.org.uk) (Accessed 05/08/24)

[100] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[101] Mental health and the cost-of-living crisis report: another pandemic in the making? | Mental Health Foundation (Accessed 05/08/24)

[102] Equalities Duty Information Report (threerivers.gov.uk) (Accessed 17/06/24)

[103] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[104] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[105] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[106] Local dementia statistics | Alzheimer's Society (alzheimers.org.uk) (Accessed 17/06/24)

[107] Local Authority Health Profiles - Data - OHID (phe.org.uk) (Accessed 24/06/24)

## Access to Services

### Access to Healthcare

In Hertfordshire, there are four major acute hospitals; the nearest one for Three Rivers' residents is the Watford General Hospital. These hospitals provide over 60% of acute care for Hertfordshire residents, with hospitals outside Hertfordshire also being accessible to residents. Close to 98% of Hertfordshire's population live within 30 minutes of an acute hospital (travelling by car). However, congestion within the County and the District of Three Rivers means that travel times may be longer than 30 minutes. In Three Rivers District, the key aspect of health provision is local GP services as there are no strategic health facilities within the district. Watford and Three Rivers practices work together and provide 24 GP practices between them[108].

Many Hertfordshire residents reported that the cost-of-living crisis has reduced their access to healthcare including dentist and optician visits, purchasing of prescription and equipment, and travel costs[109].

Ethnic minority groups are more likely to face barriers to accessing healthcare, such as discrimination[110]. Research from the NHS Race and Health Observatory in 2022[111], found that key areas of healthcare where people from ethnic minority groups face inequalities were mental health care, maternal and neonatal healthcare, digital access to healthcare and genetic testing. Although this is national study, the outcomes are likely to be relevant to Three Rivers District.

### Access to Open Spaces and Recreation

It is recognized that access to sports and recreational facilities, and proximity to and use of green and blue spaces all contribute to the positive mental wellbeing of residents. The majority of the sporting facilities (81%) within Three Rivers District are publicly accessible. In 2020, Three Rivers had the following sporting facilities[112]:

- 13 golf courses;
- 218 grass pitches;
- 10 health and fitness suites;
- 21 sports halls;
- 6 squash courts;
- 13 studios;
- 12 swimming pools;
- 7 skate parks;
- 15 artificial grass pitches; and
- 86 outdoor tennis courts.

[108] GP, pharmacy and other primary care services in Three Rivers - Herts and West Essex ICS (Accessed 21/06/24)

[109] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[110] Three Rivers Health Inequalities JSNA (Accessed 11/07/24)

[111] NHS Race and Health Observatory, Ethnic Inequalities in Healthcare: A Rapid Evidence Review (Accessed: 01/08/2024)

[112] Sport England (2020) Local Sport Profile: Three Rivers https://www.activeplacespower.com/areaprofiles Accessed 3 March 2021

Three Rivers also contains a number of parks, gardens and nature reserves which are managed by the District Council. These are listed as follows[113]:

Parks and Gardens:

- Leavesden Country Park;
- Chorleywood House Estate; and
- Bishop's Wood.

Local Nature Reserves/Woodland:

- Rickmansworth Aquadrome;
- Oxhey Woods;
- Withey Beds;
- Prestwich Meadows;
- Croxley Common Moor; and
- Carpenters Wood.

Other Open Spaces:

- South Oxhey Playing Fields;
- Denham Way Playing Fields;
- Baldwins Lane;
- Croxleyhall Woods;
- The Bury Grounds;
- Mead Place and Berry Lane;
- Scotsbridge;
- Romily Drive Open Space;
- Batchworth Heath;
- Rickmansworth Park;
- The Swillet;
- Hornhill Rec (Beechen Wood);
- Pheasants and Solomons Wood;
- Stones Orchard;
- The Green; and
- Barton Way.

Recreational Grounds:

- Eastbury Recreation Ground; and
- King George V Recreation Ground.

There are also 16 allotment sites within the district, totalling an area of 12 hectares. The National Society of Allotment and Leisure Gardeners (NSALG) recommends a national standard of 0.25

[113] Parks and open spaces. Parks and open spaces | Three Rivers District Council (Accessed 17/06/24)

hectares per 1,000 population. Based on the population in 2021, the Three Rivers District falls below the NSALG standard, with 0.13 hectares of allotment space per 1,000 population.

Figure A-2 shows a fairly even dispersal of open spaces within the district, including those designated as play areas, parks and local wildlife sites. However, the Green Space Index suggests that access to green space within the district is below the recommended provision per person[114]. TRDC aims to have no net loss of public open space, sport and recreation facilities.

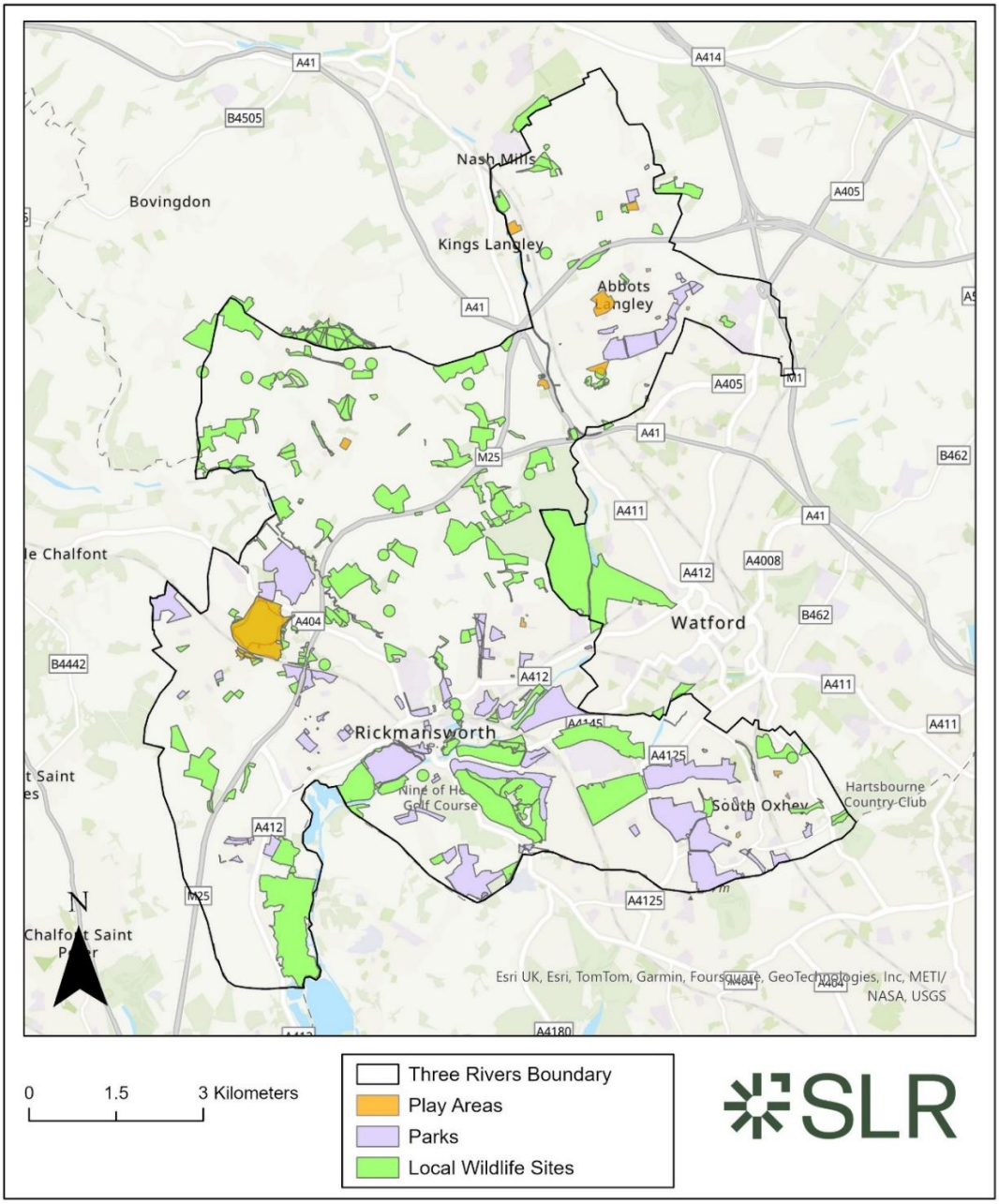



**Figure A-2: Designated Open Spaces**

[114] Green Space Index 2024 (arcgis.com) (Accessed 05/08/24)

An outdoor activity and skills programme- Healthy Outdoors- has been developed in the district, with the of reducing social isolation, increasing physical activity and improving mental health through sessions focusing on gardening skills and upcycling unused items. The sessions are based in South Oxhey, in order to target health inequalities amplified by income deprivation[115].

A number of open spaces across the district have recently undergone refurbishment in order to make the spaces more accessible for residents with disabilities. Refurbishment of the Denham way Pavilion provides additional tennis sessions for people with a disability. This has also enabled the club to provide a much needed holiday playscheme for children with disabilities to play tennis, additional sessions children with a disability and Tai Chi. South Oxhey refurbishment provides a Multi-Use Games Area (MUGA) for use by all with floor printed physical activities and a cricket wicket along with benches, board game table and low level pump track access all as part of a consultation with the local community in particular with the Northwick Day Care Centre as they used the park for recreational physical activity[116].

### Access to Transport

There are a total of six train stations within Three Rivers. Chorleywood, Croxley, Moor Park and Rickmansworth stations are served by the Metropolitan Line of the London Underground, Kings Langley Station is served by London Midland services and Carpenders Parks is served by the London Overground. Between 2021 and 2023, all stations have seen an increase in journeys recorded annually[117].

A Metropolitan Line extension had been proposed to connect Croxley Station to Watford Junction, but was discontinued in 2021. The extension would have been beneficial to residents in the district however, due to improved access to public transport (more than 2,500 households would have been within 10 minutes walk of the two new stations)[118]. This is especially key as Croxley Park is a large employment centre within the district.

The development of the High Speed Two (HS2) London-Birmingham rail line is underway within the district. During development, HS2 is likely to result in a temporary increase in in-commuting of construction traders within the district. Once constructed, the rail line will likely support increased levels of commuting in and out of London.

Bus services in Three Rivers are a mix of commercial and council led services. The District Council currently supports four bus routes[119]:

- R9: connects Abbots Langley with Watford town centre and key local destinations including Kings Langley Station, major supermarkets and Leavesden Country Park;
- W19 and 8: connects Carpenders Park station (serving both Carpenders Park and South Oxhey) with Watford North Bushey - Carpenders Park via North Watford, Watford Junction and the town centre; and
- R16/R17: the R16 is a circular service that connects South Oxhey with the Watford shopping centres. R17 is a shopper service operating in Hatch End.

[115] Equalities Duty Information Report (threerivers.gov.uk) (Accessed 17/06/24)

[116] Equalities Duty Information Report (threerivers.gov.uk) (Accessed 17/06/24)

[117] 9019166.04 (threerivers.gov.uk) (Accessed 19/06/24)

[118] Metropolitan Line extension | Three Rivers District Council (Accessed 24/06/24)

[119] Buses | Three Rivers District Council (Accessed 24/06/24)

Buses are crucial methods of transport for low-income households, and those with health issues. Affordability is another pull towards bus usage, with free travel being offered to the elderly and those with disabilities. Discounted travel is also available to children and young people aged 11–25. TRDC has implemented a 'Shopper Bus Scheme', a door-to-door bus service which transports residents with limited mobility from their home to a local supermarket[120].

TRDC operates the 'Better Buses Infrastructure Plan', which looks to improve bus infrastructure across the district with the installation of new or additional bus shelters at bus stops where one isn't currently provided or where bus usage is high and additional capacity is needed (e.g. schools)[121].

Despite the District being well served by communication links, travel by private vehicle is still prevalent in the district. 87.5% of households in Three Rivers own at least one vehicle[122], and traffic levels in the district are expected to grow by 15.6% by 2031. Increased congestion and car use could harm the quality of the environment and affect the social wellbeing of residents. This mode of travel is favoured by 69% residents with mobility and/or long-term health problems, suggesting that private transport across the district is more suitable than public transport. This is supported by an 8% increase in blue badge applications between 2019 and 2022[123].

The location of new development may have a significant impact on transport and travel and the travel choices made. TRDC should seek to direct development to the areas with greatest access to public transport, services and facilities, which should contribute to reducing the need to travel and journey lengths, and enable the use of public transport, walking and cycling as alternatives to the car.

### Access to Education

There are twenty-six primary schools and seven secondary schools within the district- or in neighbouring Districts- that serve Three Rivers residents[124]. The district also has good access to Buckinghamshire New University in High Wycombe as well as the University of Hertfordshire in both Hatfield and St Albans. There are only four 16+ colleges in Hertfordshire, none of which are located in the district. The closest is Amersham College in neighbouring Buckinghamshire.

There are the following three Special Schools within the District- or in neighbouring Districts- that serve Three Rivers residents:

- Breakspreare School (Abbots Langley);
- Colnbrook Special School (Watford); and
- Garston Manor School (Watford).

The following two sites may be developed for future school provision:

- Carpenders Park Farm, Oxhey Lane (Secondary School); and
- Woodside Road, Abbots Langley (Primary school).

[120] Accessibility | Three Rivers District Council (Accessed 19/06/24)

[121] Buses | Three Rivers District Council (Accessed 24/06/24)

[122] Number of cars or vans - Census Maps, ONS (Accessed 05/08/24)

[123] Hertfordshire Traffic and Transport Data Report 2023 (Accessed 05/08/24)

[124] School directory | Hertfordshire County Council (Accessed 23/08/24)

## Educational Attainment

As highlighted in Table A-4 a significant proportion of residents in Three Rivers hold at least a Level 1 qualification (94.4%). This is higher than the East of England average (90.9%) and the Great Britain average (89.0%). This pattern continues for other levels of qualification, with 76.6% of residents holding at least a Level 4 qualification. This suggests that the majority of residents of Three Rivers are highly educated.

**Table A-4: Qualification Levels**

| | Three Rivers | East of England | Great Britain |
|---|---|---|---|
| RQF1 | 94.4 | 90.9 | 89.0 |
| RQF2 | 94.4 | 88.0 | 86.5 |
| RQF3 | 86.9 | 64.7 | 67.8 |
| RQF4 | 76.6 | 42.8 | 47.3 |

*Source: Nomis Labour Market Profiles: Qualifications (2023)*

In 2019, 28.3% of pupils at the end of Key Stage 4 in state funded schools within Three Rivers achieved the English Baccalaureate at a grade 5 or above in English and maths and at a grade C or above in sciences, a language and history or geography. This was a decrease of 3.4% on the previously recorded figure for Three Rivers District which was 31.7%. This was higher than the Hertfordshire average for state-funded schools in 2019 of 24% and of 17% in England[125].

## Employment

Three Rivers is a part of a function economic market area (FEMA) with neighbouring authorities Dacorum, Hertsmere, St Albans, and Watford, developed as a result of commuting and migration patterns, and shared leisure, retail and public services. Three Rivers has the smallest employment and business base in the FEMA. It shares close economic and labour market links with neighbouring Watford, with a high proportion of Three Rivers residents commuting into the town. The main employment centres are found at Croxley Park, Kings Langley, Maple Cross and Leavesden. 55% of all employment in the district is office based[126].

Within the District, 79.8% of the working population (16-64 years) were economically active between January 2023 and December 2023. This is lower than the East of England average (80.6%) but higher than the national average (78.8%). However, there is a significant gender difference in the number of economically active males (91.6%) and females (66.3%)[127].

As seen in Table A-5, average weekly earnings in 2023 for people who work full time in Three Rivers were higher than the average for neighbouring Hertsmere, as well as East of England and Great Britain. Average weekly earnings for men were significantly higher than for women in the district, with an average pay gap of £238. The average pay gap in weekly earnings is much higher in Three Rivers than in neighbouring authorities Hertsmere (£92.5) and St Albans (£180)[128].

[125] Annual Monitoring Report 2022/23 9019166.04 (threerivers.gov.uk) (Accessed 19/06/24)

[126] Regeneris Report (threerivers.gov.uk) (Accessed 24/06/24)

[127] Nomis Labour Market Profiles: Three Rivers Labour Market Profile - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk) (Accessed 19/06/24)

[128] Nomis Labour Market Profiles: Three Rivers Labour Market Profile - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk) (Accessed 19/06/24)

**Table A-5: Average Weekly Earnings (£)**

| | Three Rivers (£) | Hertsmere (£) | St Albans (£) | East England (£) | Great Britain (£) |
|---|---|---|---|---|---|
| Full time | 826.7 | 730.0 | 873.6 | 705.7 | 682.6 |
| Male full time | 886.3 | 756.3 | 946.6 | 755.6 | 728.3 |
| Female full time | 648.3 | 663.8 | 766.6 | 635.3 | 628.8 |

*Source: Nomis Labour Market Profiles: Earnings by Place of Work (2023)*

Unemployment rates within the district stood at 3.8% between January 2023 and December 2023. Unemployment rates in Three Rivers are slightly higher than the East of England average (3.6%) and the Great Britain average (3.7%)[129]. In 2021/22, 3.1% of the district's working age population were claiming out of work benefits, and 1.3 per 1000 residents were considered 'long term unemployed'[130].

Unemployment rates vary spatially across the district. The percentage of the working age population claiming out of work benefits is highest in the most deprived ward (South Oxhey- 5.7%) and lowest in one of the least deprived wards (Moor Park and Eastbury- 1%). Figures are similar for residents considered as 'long term unemployed'; 3.6 per 1000 residents within South Oxhey are considered as long term unemployed, whereas 0 per 1000 residents in Moor Park and Eastbury are considered as long term unemployed [131]. There will need to be training opportunities in place for those returning to work, in order to support them in becoming skilled workers.

A significant proportion of Three Rivers residents (86.8%) fall under three employment categories: managers, directors and senior officials; professional occupations; and associate professional occupations. The proportion of residents employed in these professions is significantly higher than the East England average (53.5%) and the national average (52.9%)[132]. These figures suggest that the district holds a well skilled and qualified workforce.

## Crime

Victim based crime rates within the district were recorded at 18.18 crimes per 1000 population at the end of 2023. This figure is lower than the Hertfordshire average (21.58 crimes per 1,000)[133].

Table A-6 highlights the number of type of offenses committed in the district between 2019 and 2023. Recorded figures show robbery and vehicle offences have decreased since 2019, whilst violence against persons and burglary offenses have fluctuated, but are the same as 2019[134]. Overall, the highest rate of offenses is violence against persons and burglaries. The design of developments could subsequently have an effect on these offenses.

[129] Nomis Labour Market Profiles: Three Rivers Labour Market Profile - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk) (Accessed 19/06/24)

[130] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

[131] Hertfordshire & West Essex District Profile 2024 (hertshealthevidence.org) (Accessed 24/06/24)

[132] Nomis Labour Market Profiles: Three Rivers Labour Market Profile - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk) (Accessed 19/06/24)

[133] Violence against the person (offences per 1,000 population) in Three Rivers | LG Inform (local.gov.uk) (Accessed 13/06/24)

[134] Annual Monitoring Report 2022/23 9019166.04 (threerivers.gov.uk) (Accessed 19/06/24)

**Table A-6: Type of Offense Per 1000 Residents**

| | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|
| Violence against persons | 17.0 | 17.4 | 18.6 | 17.0 |
| Robbery | 1.0 | 0.3 | 0.2 | 0 |
| Burglary | 4.0 | 3.0 | 2.6 | 4.0 |
| Vehicle offenses | 7.0 | 6.0 | 5.4 | 5.0 |

Although crime rates are relatively low across the district, knife crime and serious youth violence remains of high concern among residents[135].

A number of initiatives and projects have been implemented in order to reduce crime across the district. The Community Safety Partnership (CSP) has been developed as part of the Local Strategic Partnership and is a network of public bodies and organisations that work together to reduce crime and antisocial behaviour to keep our communities safe. The CSP annually assesses the level of crime and disorder within the district, along with concerns expressed by the local community[136]. Additionally, the Three Rivers Neighbourhood Watch work with the Hertfordshire Constabulary to offer advice and training on crime prevention, including advice on setting up and running a Neighbourhood Watch scheme[137].

A 'Tackling Violence Against Women and Girls Head On' project has been developed, providing police-led self-defence lessons for women in Rickmansworth and a community safety team-led training day on how to engage perpetrators in interventions for female professionals[138].

## Housing

Access to housing is a fundamental part of achieving a good quality of life in which stable relationships, good health and education, and rewarding work can be achieved. House and rental prices across the district are high and there is a growing and ageing population which presents further housing challenges[139].

As shown in Table A-7, levels of home ownership in the district are slightly higher than the regional and national rates, whilst private renting is lower than both the regional and national rates. This is likely to be a result of the district being relatively affluent. However, it may also reflect the high price of rental costs, forcing those on a lower income to look beyond Three Rivers to source affordable housing[140].

[135] Anti-knife crime and serious youth violence initiative extended | | Three Rivers District Council (Accessed 19/06/24)

[136] a5af0540-7ee7-11ee-9786-b1b33c9de7b9-Community Strategy 23-28.pdf (threerivers.gov.uk) (Accessed 19/06/24)

[137] Community safety in Three Rivers District | Three Rivers District Council (Accessed 19/06/24)

[138] Self-defence and safety course for Three Rivers women | Crime and safety | Three Rivers District Council (Accessed 19/06/24)

[139] 1da7d590-fd55-11ee-b009-2b65741e1885-Appendix One - HOUSING, HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2028.pdf (threerivers.gov.uk) (Accessed 19/06/24)

[140] 1da7d590-fd55-11ee-b009-2b65741e1885-Appendix One - HOUSING, HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2028.pdf (threerivers.gov.uk) (Accessed 19/06/24)

Residents in the least deprived areas of the district are far more likely to be property owners, whereas residents in the most deprived areas of the district are more likely to be renting, including social housing.

**Table A-7: Housing**

| Housing Type | Three Rivers | East of England | England |
|---|---|---|---|
| Owned or shared ownership | 71.6% | 66.2% | 62.3% |
| Private rented or lives rent free | 13.4% | 18.3% | 20.6% |
| Social rented | 14.8% | 15.5% | 17.1% |

Since 2011, the level of owned or shared ownership households has decreased by 1.8%, and the level of private rented households has increased by 2.8%[141]. This may be a result of the cost-of-living crisis, making mortgage prices unaffordable to more residents. Three Rivers has the third highest average house price in the county. It is predicted that due to this cost-of-living crisis, approaches to the council for housing advice and assistance will increase[142].

Issues of affordability are further exacerbated by a lack of affordable housing development in the district. Three Rivers aims for 45% of all new housing to be affordable. During the 2022/23 monitoring period, 61 new affordable homes were built; this equates to 27.8% of all new housing built during this time period being affordable. Out of these 61 affordable homes, 33 affordable rented homes and 28 shared equity homes were provided. Since the start of the plan period in 2001, 1,223 gross affordable homes have been completed, which amounts to 22.6% of a total 5,388 gross dwelling completions[143]. The district has the lowest need for affordable housing in Hertfordshire[144].

The barriers to housing domain of the IMD 2019 measures the physical and financial accessibility of housing. TRDC is ranked 131st out of 317 local authorities in England (where a rank of 1 is the most deprived)[145]. At the LSOA level, there are a number of that are located amongst the top 20% most deprived neighbourhoods nationally. These are located in the wards of Oxhey Hall and Hayling, Chorleywood North and Sarratt and Gade Valley.

Three Rivers has an ageing population, with 24.2% of residents predicted to be aged 65 or older by 2041. This may increase the need to provide additional accommodation that is suitable for the needs of older people with different requirements. Developing to the Building Regulations (2010) Standards (Part M)- specifically relating to accessible and adaptable dwellings, as well as wheelchairs user access- would help to support these residents further and enable them to live independently for longer.

In 2021, there were three travelling communities that are either permanent residents in Three Rivers or visit the district. There are five authorised Gypsy and Traveller sites within Three Rivers,

[141] How life has changed in Three Rivers: Census 2021 (ons.gov.uk) (Accessed 24/06/24)

[142] 1da7d590-fd55-11ee-b009-2b65741e1885-Appendix One - HOUSING, HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2028.pdf (threerivers.gov.uk) (Accessed 19/06/24)

[143] Annual Monitoring Report 2022/23 9019166.04 (threerivers.gov.uk) (Accessed 24/06/24)

[144] South West Herts Local Housing Needs Assessment Update 2023 (Accessed 23/08/24)

[145] The English Indices of Deprivation 2019 | Ministry of Housing, Communities and Local Government

providing 33 pitches with permanent planning permission, all of which are privately owned and managed. There are currently no unauthorised pitches within Three Rivers.

In 2023, Three Rivers District Council retrofitted the poorest performing socially rented and privately rented/owner occupied homes focusing on the most vulnerable households, in order to support those most at risk of fuel poverty, low-income households and those living with disabilities and/or health conditions.

## Air Quality

Poor air quality can have a direct impact on health, particularly on those with pre-existing respiratory diseases such as chronic obstructive pulmonary disease (COPD) or asthma. 1.6% of Three Rivers residents have COPD and 6.3% have asthma. These figures are slightly lower than the regional and national averages. In 2022, 14.8 per 1000 residents died from respiratory disease. Respiratory causes of death were higher for males in Three Rivers' (28.4%), than females (24.2%).

There are two areas deemed as Air Quality Focus Areas (AQFAs) within Three Rivers (Chorleywood NO2 and PM10). These are areas that exceed or are likely to exceed the EU annual mean limit for nitrogen dioxide (NO2) and have high human exposure. These AQFs have also been identified to highlight areas that may never have their air pollution issues fully resolved, despite national, regional, and local air quality measures. It is therefore likely that residents living within these areas will have a disproportionate exposure to air pollution, and thus the associated health impacts. There is evidence to suggest that premature deaths (40-50,000 per year in the UK) are caused by poor air quality. The most recent Air Quality Status Report (2023) highlights that NO2 concentrations have decreased at most air quality monitoring sites over the last 5 years. There were also no exceedances of the annual mean objective at the Chorleywood NO2 AQMA.

Three Rivers District Council aims to reach net-zero carbon across the district by 2045. This will require a 14% reduction in emissions from 2023-2028. Currently, the average household in Three Rivers produces 18.9t of CO2e per year compared to the GB average of 16t of CO2e per year, with consumption of goods and services having the highest impact. The District Council will aim to meet this target by encouraging developers to adopt net zero design standards (including the integration of renewable energy and low-carbon heat technologies), supporting residents and businesses to reduce their energy use and improve the efficiency of their homes and buildings, and expanding public electric vehicle charging infrastructure.

## Noise

Excessive noise seriously harms human health and can interfere with daily activities at school, at work, at home and during leisure time. It can disturb sleep; cause adverse cardiovascular, metabolic, psychophysiological and birth outcomes; lead to cognitive and hearing impairment; reduce performance; and provoke annoyance responses and changes in social behaviour[146].

Noise Action Plans are required by the Environmental Noise Directive. The Department for Environment Food and Rural Affairs (Defra) has identified locations experiencing the highest levels of noise associated with roads and railway lines. These are known as Noise Important Areas (NIAs).

With regards to road noise, there are a large number of NIAs in the District, the majority of which are associated with the M25 as well as the M1, A404 and A412. There are six NIAs associated with railway noise in the district, located at Kings Langley Railway station and the line south of the

[146] Health Topics – Noise | World Health Organisation

station at Hunton Bridge and the line north at Nash Mills (two NIAs). There are two further NIAs at Moor Park Underground Station (Metropolitan Line) and Carpenders Park (Overground).

# Appendix B HIA Assessment Matrices

## Three Rivers District Council Local Plan

### Integrated Health and Equality Impact Assessment

**Three Rivers District Council**

SLR Project No.: 430.000113

16 January 2026

## B.1 HIA Assessment

### B.1.1 Spatial Strategy

The assessment of Spatial Strategy is presented in **Table B-1** below.

**Table B-1: HIA of Spatial Strategy**

| Policy Grouping Name | Spatial Strategy | | | | |
|---|---|---|---|---|---|
| Included Policies | Overall Levels of Growth<br>Infrastructure Delivery | | | | |
| Health Impact Assessment | | | | | |
| Determinants of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | ? | ST/LT | New development has the potential to give rise to air quality effects both during construction with respect to material transport and equipment emissions and during operation dependent on the nature of the activities proposed.<br><br>Whilst air quality is not explicitly referenced within the 'Spatial Strategy' polices, the text supporting the 'Overall Levels of Growth' policy states that the proposed housing and employment growth has been 'curtailed to ensure that the plan remains environmentally responsible and consistent with national policy.' Thus, this implies air quality considerations will be considered within the design of new development.<br><br>The 'Infrastructure Delivery' also policy explains that the natural, built and historic environment should be conserved and enhanced, which suggests development that would give rise to adverse air quality impacts will not be permitted. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to air quality will likely be provided by the Environment related policies. |
| Noise | ? | ST/LT | New development has the potential to give rise to noise effects both during construction with respect to material transport and equipment emissions and during operation dependent on the nature of the activities proposed.<br><br>Whilst noise is not explicitly referenced within the 'Spatial Strategy' polices, the text supporting the 'Overall Levels of Growth' policy states that the proposed housing and employment growth has been 'curtailed to ensure that the plan remains environmentally responsible and consistent with national policy.' Thus, this implies air quality considerations will be considered within the design of new development.<br><br>The 'Infrastructure Delivery' policy explains that the natural, built and historic environment should be conserved and enhanced, which also suggests development that would give rise to adverse air quality impacts will not be permitted. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to noise will likely be provided by the Environment related policies. |

| | |
|---|---|
| Policy Grouping Name | Spatial Strategy |
| Included Policies | Overall Levels of Growth<br>Infrastructure Delivery |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinants of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Housing | +/- | ST/LT | Additional housing provision, including high quality housing and a mix of housing types and tenures, contributes to ensuring appropriate provision for current and future populations. Housing is proposed in the most sustainable locations, specifically, principal towns, small towns and large villages which have higher levels of accessibility, services and infrastructure capacity. This is beneficial in ensuring residents are able to access the services they require to meet their daily needs, without being dependent on the use of the car.<br><br>However, the Draft Local Plan significantly underdelivers on the calculated housing need of 12,480 (across the plan period) as identified by the standard methodology. The plan only provides scope for 6,200 new dwellings which may have negative health effects given the district has an acute affordable housing and specialist accommodation need (particularly given the districts ageing population) and it is unclear if such needs will be delivered in full.<br><br>The Spatial Strategy also encourages higher-density development in response to there being limited brownfield land opportunities and given the authority is tightly constrained by the Green Belt. Whilst this is positive in increasing resident proximity to jobs, services and encourages walking/cycling (such as through the 15-minute city concept), the draft policies lack detail on how social isolation will be addressed (i.e. through communal ground floor facilities/services) where tall buildings are required. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Care leavers<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | Given the spatial strategy significantly underdelivers on its housing need (as identified by the standard methodology) greater context should be included as to how the acute affordable housing and specialist accommodation needs are addressed across the district (with reference to the 'Sustainable Development' policies). |
| Economy and Employment | + | ST/LT | The policies outlined within this theme positively contribute to access to services throughout TRDC. The spatial strategy seeks to direct new employment to the most sustainable locations, specifically, principal towns, small towns and large villages which have higher levels of accessibility, services and infrastructure capacity. This is beneficial in ensuring residents are able to access the services they require to meet their daily needs, without being dependent on the use of the car.<br><br>The Economic Study supporting the local plan explains that there are limited quantitative needs for new employment land given the districts economic profile and constraints. Nonetheless, the 'Overall Levels of Growth' policy confirms that existing employment sites will be safeguarded which is important in ensuring such sites can continue to positively contribute to the local economy, whilst ensuring the job security of the local workforce.<br><br>New employment opportunities are also likely to be secured through the new housing development and via the provision of new infrastructure (e.g. construction jobs/operational jobs associated with the use of certain facilities like new schools), providing further opportunities for the local population. | Unemployed and low-income groups<br>Socially excluded or isolated groups<br>Care leavers<br>Socially excluded or isolated groups | Where possible, employment opportunities should seek to provide employment to the local population in the first instance. |

| | |
|---|---|
| Policy Grouping Name | Spatial Strategy |
| Included Policies | Overall Levels of Growth<br>Infrastructure Delivery |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinants of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Education and Skills | ? | LT | The delivery of new infrastructure and services may provide opportunities for education, skills and training, particularly within employment related development. The 'Infrastructure Delivery' policy also makes reference to 'cumulative pressures on the local area' arising new development, which could include new school places given this is an essential service. Thus, whilst uncertain, this implies new opportunities for education/skills may be delivered as part of the spatial strategy. | N/A | Where possible, employment should seek to encourage new opportunities for education and skills. |
| Social Cohesion and Community Safety | + | LT | The development of new housing and employment is anticipated to encourage social interaction and a sense of community belonging, and the spatial strategy offers opportunities to further this, such as via encouraging the development of new infrastructure, green spaces and community facilities. Development is also directed to sustainable locations which will help ensure all residents in the community have equitable access to essential services and thus reducing social inequality.<br><br>Social cohesion will also be strengthened via the 'Infrastructure Delivery' policy that will ensure new development will deliver new infrastructure and service provision, which will be secured by planning obligations and the community infrastructure levy (CIL). The creation of new infrastructure/services is particularly beneficial in creating new opportunities for interaction and ensuring residents service/amenity needs are fulfilled. However, a lack of detail is provided as to how community safety/security will be ensured within the polices.<br><br>In addition, the Spatial Strategy encourages higher-density development in response to there being limited brownfield land opportunities and given the authority is tightly constrained by the Green Belt. Whilst this is positive in increasing resident proximity to jobs, services and encourages walking/cycling (such as through the 15-minute city concept), the draft policies lack detail on how social isolation will be addressed (i.e. through communal ground floor facilities/services) where tall buildings are required which as a result could have a negative impact upon social cohesion. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | Mitigation secured with respect to safety and secuirty within the 'local Distinctiveness and Place Shaping' policy should be adhered to. |

| Policy Grouping Name | Spatial Strategy |
|---|---|
| Included Policies | Overall Levels of Growth<br>Infrastructure Delivery |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinants of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Access to Services | + | LT | The policies outlined within this theme positively contribute to access to services throughout TRDC. The spatial strategy seeks to direct growth to the most sustainable locations, specifically, principal towns, small towns and large villages which have higher levels of accessibility, services and infrastructure capacity. This is beneficial in ensuring residents are able to access the services they require to meet their daily needs, without being dependent on the use of the car.<br><br>It is acknowledged that an increased population in the district through the provision of new housing as proposed in the Spatial Strategy may put pressure on existing services. However, the 'Infrastructure Delivery' policy seeks to ensure new services/infrastructure are delivered 'to address the direct needs of new occupants while protecting the service capacity of existing community networks', which implies new services will be delivered in response to increase demands (e.g. increased school places). The policy will also ensure services/infrastructure are secured via planning obligations and the community infrastructure levy (CIL)<br><br>In addition, the Spatial Strategy encourages higher-density development in response to there being limited brownfield land opportunities and given the authority is tightly constrained by the Green Belt. Whilst this is positive in increasing resident proximity to jobs, services and encourages walking/cycling (such as through the 15-minute city concept), the draft policies lack detail on how social isolation will be addressed (i.e. through communal ground floor facilities/services) where tall buildings are required | Older people<br>People with disabilities and mobility impairment<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | Whilst new development will be directed to sustainable locations, the spatial strategy explains that 1-2% of housing growth will be within washed-over Green Belt villages and comprise small-scale schemes. Notwithstanding this only constituting a small portion of the districts housing growth, development in such locations should be supported by the appropriate services to meet resident needs.<br><br>It is assumed the IDP would be updated to reflect the current socio-economic/health profile across the Three Rivers District.<br><br>The policy should also be expanded to provide detail as to how social isolation will be addressed, where tall buildings are required. |
| Physical Activity | + | LT | The policies outlined within this theme positively contribute to access to services throughout TRDC. The spatial strategy seeks to direct growth to the most sustainable locations, specifically, principal towns, small towns and large villages which have higher levels of accessibility, services and infrastructure capacity. This is beneficial in ensuring residents are able to access the services they require to meet their daily needs, without being dependent on the use of the car.<br><br>The text supporting the spatial strategy further explains that in assessing potential sites for housing, those with 'poor opportunities for walking and cycling' were discounted which is particularly important in ensuring residents are able to uptake active travel.<br><br>In addition, the text supporting the 'Infrastructure Delivery' policy denotes that infrastructure can include 'footpaths, cycle paths and roads; and green spaces, such as parks, country parks and other general ecological enhancements', which suggests opportunities to enhance opportunities for physical activity has been considered. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | Improvements to footpaths, cycle paths and roads and green spaces should be secured within the new development before planning consent (i.e. planning obligations/ integrated into the design of developments). |

| Policy Grouping Name | Spatial Strategy |
|---|---|
| Included Policies | Overall Levels of Growth<br>Infrastructure Delivery |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinants of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Green Infrastructure | + | LT | This spatial strategy seeks to limit Green Belt development, which in turn may protect existing green infrastructure in this area. However, there is still potential limited Green Belt development, where development meets national policy criteria which has potential to result in loss of green infrastructure if development is to occur.<br><br>Nonetheless, the text supporting the 'Infrastructure Delivery' policy explains green infrastructure will be enhanced and conserved, whilst development is expected to provide new opportunities for green infrastructure in the extant IDP (which is assumed to be updated as part of the new Local Plan). | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | It is assumed the IDP would be updated to reflect the current socio-economic/health profile across the Three Rivers District. |

### B.1.2 Sustainable Development

The assessment of Sustainable Development Policies is presented in **Table B-2** below.

**Table B-2: HIA of Sustainable Development Policies**

| Policy Grouping Name | Sustainable Development | | | | |
|---|---|---|---|---|---|
| Included Policies | Housing Density<br>Provision for Gypsies, Travellers and Travelling Showpeople<br>Affordable Housing<br>Housing Mix and Type | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | ? | ST/LT | Additional housing in the district could result in a high number of cars on the roads which could worsen air quality particularly given that there are three AQMAs in place across the district. Temporary worsening of air quality may also occur during construction through dust and plant emissions. Overall effects will likely depend upon the location of future sites and their access to existing facilities and services, which could minimise the need to travel. The Housing Density Policy supporting text states that new development will have 'due regard for the character and amenities of the district and the quality of life of residents' which implies access to services will be considered. | Older people<br>Children and young people<br>People with existing health conditions | Mitigation will likely be provided by the Sustainable Transport and Travel policy.<br><br>Additional mitigation could be offered by the consideration of Dust Management Plans (DMP) should be compiled prior to demolition and construction of new sites. Consideration should also be given to energy-efficient and electric or hybrid machinery/machinery. |
| Noise | ? | ST/LT | Additional housing in the district, including high-density housing, could have impacts on the existing surrounding communities in terms of noise. Temporary increases in noise pollution may also occur during construction. Overall, effects will likely depend upon the location of future sites and the nature of developments. The Housing Density Policy supporting text states that new development will have 'due regard for the character and amenities of the district and the quality of life of residents' which implies access to services will be considered. | Older people<br>Children and young people<br>People with existing health conditions | Mitigation will likely be provided by the Deliveries, Servicing and Construction.<br><br>Additional mitigation could be offered by the consideration of a Construction Environmental Management Plan (CEMP) should be compiled prior to demolition and construction of new sites. Consideration should also be given to ensuring noise buffering at the site. |
| Housing | + | LT | Additional housing provision, including high quality housing and a mix of housing types and tenures, contributes to ensuring appropriate housing for current and future populations. This also provides a mix of homes, including affordable and adaptable homes, which is anticipated to improve access to homes for those who may experience barriers in accessing high quality housing. The Provision for Gypsies, Travellers and Travelling Showpeople Policy also considers accessibility of housing to wider facilities, linking these groups with the existing community. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Care leavers<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | N/A |
| Economy and Employment | 0 | | The policies within Sustainable Development are unlikely to impact upon economy and employment within TRDC. | N/A | N/A |
| Education and Skills | 0 | | The policies within Sustainable Development are unlikely to impact upon education and skills within TRDC. | N/A | N/A |

| Policy Grouping Name | Sustainable Development |
|---|---|
| Included Policies | Housing Density<br>Provision for Gypsies, Travellers and Travelling Showpeople<br>Affordable Housing<br>Housing Mix and Type |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Social Cohesion and Community Safety | + | LT | The development of new housing is anticipated to encourage social interaction and a sense of community belonging. The Housing Mix and Type policy states the need for the creation of balanced and sustainable communities as well as ensuring specialised and supported accommodation supports integration with the community, which is anticipated to promote social cohesion. The Provision for Gypsies, Travellers and Travelling Showpeople Policy also considers accessibility of housing to wider facilities, linking these groups with the existing community. There is also potential for high quality development, as outlined within the Housing Density policy, to contribute to improved community safety. However, this is likely to be determined by individual developments that may arise. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | N/A |
| Access to Services | +/- | LT | The policies outlined within this theme positively contribute to access to services throughout TRDC.<br>Policies aim to locate gypsy and traveller sites in close proximity to services and facilities. The Housing Density Policy supporting text states that new development will have 'due regard for the character and amenities of the district and the quality of life of residents' which implies access to services will be considered. Additionally, the Housing Mix and Type policy ensures that specialised and supported accommodation is well located close to services and facilities. However, increased population in the district through the provision of new housing under this group may put pressure on existing services. The increased demand on services may have an adverse effect on the health and wellbeing of the population. | Older people<br>People with disabilities and mobility impairment<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | Mitigation will likely be provided by the Health and Wellbeing and Social and Community Uses policies.<br><br>Additional mitigation could be offered by undertaking further assessment as part of scheme design, to evaluate the provision of existing facilities and ensure that supply is sufficient to support new communities. |
| Physical Activity | ? | LT | The Provision for Gypsies, Travellers and Travelling Showpeople Policy considers the location of sites, ensuring good pedestrian access to the site and adequate on site play amenity. Overall, effects will likely depend on the location of future sites and their access to open space, as well as recreational networks, which could improve physical activity. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | Mitigation will likely be provided by the Health and Wellbeing, Sustainable Transport and Travel, and Open Space, Play Space, Sport and Recreation policies. |
| Green Infrastructure | ? | LT | Additional development of housing in the district, including high-density housing, could result in the potential loss of green space, depending upon the location of development. This is particularly likely to occur if development arises within the green belt.<br>There is also potential for development of housing to result in additional green space provision within developments, and the incorporation of green infrastructure within design. However, this is likely to be determined by individual developments that may arise. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | Mitigation will likely be provided by the Green Belt, and Open Space, Play Space, Sport and Recreation policies. |

### B.1.3 Employment

The assessment of Employment Policies is presented in **Table B-3** below.

**Table B-3: HIA of Employment Policies**

| Policy Grouping Name | Employment | | | | |
|---|---|---|---|---|---|
| Included Policies | Retail<br>Warner Brothers Allocation<br>Employment and Economic Development | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | ? | ST/LT | These policies will likely lead to significant levels of new employment related development within the plan area which has the potential to worsen air quality particularly given that there are three AQMAs in place across the district. Air quality impacts may materialise via increased transportation as a result of construction activities during the short term and the longer term impacts associated with employees and commuting.<br><br>Nonetheless, there is potential for a betterment in local air quality concerning an expanded workforce. The text supporting the policy refers to The South West Herts Economic Study Update (2024) which identifies an existing trend of high levels of out-commuting from the Three Rivers District which limits the labour supply. Thus, new employment opportunities locally have the potential to address this problem in reducing the distance residents travel employment destinations and the associated transport emissions.<br><br>The 'Employment and Economic Development' polices also state that proposals 'should be of a high-quality design and in keeping with the surrounding environment', which implies environmental impacts have been considered, however, is largely silent on measures that should be secured to achieve good air quality. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Where possible, employment opportunities should seek to provide employment to the local population in the first instance.<br><br>Mitigation should be provided by the Sustainable Transport and Travel policy such as promoting car sharing.<br><br>Additional mitigation should be identified by the means of an air quality assessment and could be offered by the consideration of Dust Management Plans (DMP) that should be compiled prior to demolition and construction of new sites and be<br><br>Consideration should also be given to energy-efficient and electric or hybrid machinery/machinery at employment sites |
| Noise | ? | ST/LT | New employment development including new retail and industrial premises could impact the surrounding communities and workforce concerning noise. This includes temporary increases in noise pollution as a result of construction activities such as increased traffic and the establishment/construction compounds. Impacts may also materialise during operation of employment development, depending on the nature of the industry (e.g. industrial sites often contain machinery that can generate significant levels of noise).<br><br>Consideration of noise is imperative in ensuring the local workforce are not exposed to significant level of noise that would exceed recommended exposure limits, whilst ensuring local communities are not adversely affected, particularly those who spend longer period at home and thus greater exposed to increased noise levels including TRDCs ageing population.<br><br>The 'Employment and Economic Development' polices state that development should not have an 'unacceptable impact on amenity', suggestive noise impacts have been considered, however, omits any detail as to how the local workforce should be protected from elevated noise levels. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation should be provided by the noise policy such provide suitable buffers from employment bases to protect residential amenity.<br><br>Mitigation could be offered by the consideration of a Construction Environmental Management Plan (CEMP) should be compiled prior to demolition and construction of new sites. Consideration should also be given to ensuring noise buffering at the site.<br><br>Consideration could also be offered by the means of a workforce management plan to protect the health and safety of employees. |

| Policy Grouping Name | Employment |
|---|---|
| Included Policies | Retail<br>Warner Brothers Allocation<br>Employment and Economic Development |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Housing | + | ST/LT | The text supporting the proposed 'Employment and Economic Development' policy explains that 'it is important to make provision for future employment and economic development alongside housing growth (...)' which implies to the delivery of new housing and employment facilities will be considered together. Moreover, the 'Employment and Economic Development' policy also states that the 'locality and accessibility' of new development will be considered in new development, implying residents will be able to access employment in a sustainable manner. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Care leavers<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | Where possible, employment opportunities should seek to provide employment to the local population in the first instance.<br><br>Developer contributions should be secured from new housing development to ensure the appropriate infrastructure and required services are deliver to support the local population which in turn will create new employment opportunities. |
| Economy and Employment | + | ST/LT | There will be significant levels of new employment related development which will generate new opportunities for the local workforce. New local opportunities are particularly important to ensure the local workforce are retained within the borough given there is a trend of high levels of out-commuting from the district. New employment opportunities is also beneficial given there has been a rise in unemployment in the area between 2016 and 2022 (albeit this trends remains lower than the national average).<br><br>The expansion of the Warner Brother Film Studios is advantageous in strengthening Leavesden role as a major visitor location and allowing it to continue to make significant contributions to the local and national economy, whilst responding to the need for more studio space.<br><br>Furthermore, the retail policy recognises the role that town centres and district centres can play in supporting the local economy, and encourage the development of retail, leisure activity and other town centre uses to increase local expenditure. However, the policy would benefit from greater context on town centre viability, particularly in more deprived areas (like South Oxhey for instance) where there may be a requirement for more creative solutions (e.g. a shift focus from just retail to mixed uses) to develop and regenerate the town centre. | Unemployed and low-income groups<br>Socially excluded or isolated groups<br>Care leavers<br>Socially excluded or isolated groups | Where possible, employment opportunities should seek to provide employment to the local population in the first instance and provide equal opportunities for all groups to apply from future employment positions.<br><br>The policy could also be expanded to include more creative solutions to ensure town centre viability. |
| Education and Skills | + | LT | Education is important for health as it provides the skills and specialist knowledge needed to secure good jobs and allows residents to participate in society, particularly those in areas that are subject to increased levels of deprivation and unemployed.<br><br>The 'Employment and Economic Development' policy seeks to secure a range of types and sizes of employment sites and premises to meet the needs of the local economy which will likely bring new opportunities for education, training and upskilling. This is alongside the proposed expansion of the Warner Brother Film Studio that responds to the demand for more creative space. However, the delivery of a diverse range of employment types does not necessarily guarantee equal access to training and education. As such, the employment policies could be strengthened to encourage/require applicants to provide training and education opportunities to employees. | Unemployed and low-income groups<br>Socially excluded or isolated groups<br>Young people<br>Care leavers | Where possible, employment should seek to encourage new opportunities for education and skills. |

| Policy Grouping Name | Employment |
|---|---|
| Included Policies | Retail<br>Warner Brothers Allocation<br>Employment and Economic Development |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Social Cohesion and Community Safety | + | LT | The delivery of new retail and employment development is likely to improve social cohesion by providing economic stability, particularly for those who are unemployed and living in deprivation. New retail development may also assist in improving and regenerating town centres and improve social cohesion by creating focal points for interaction and cohesion.<br><br>However, concerning community safety, the 'Employment' policies could benefit from context as to which safety and security measures should be in place to prevent crime and anti-social behaviour. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Care leavers<br>Unemployed and low-income groups<br>Socially excluded or isolated groups | Mitigation relating to safety will likely be provided by the Design related policies |
| Access to Services | + | LT | The 'Employment' policies are anticipated to improve access to services, including the ‘Retail’ policy that seeks to deliver new employment and economic development opportunities to meet the need for a range of employment uses including office, industry and warehousing, public and community, leisure and tourism and town centre.<br><br>The 'Employment and Economic Development' policy also outlines that outside of designated employment areas, new development will not be permitted where it causes 'harm to the amenity or operation of neighbouring uses', which implies that new employment development will not impact upon access to essential services. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Socially excluded or isolated groups | N/A |
| Physical Activity | ? | LT | The 'Warner Brothers Allocation' policy proposes that land to the north of the site is used for green infrastructure and public open space which is beneficial in providing new opportunities for social interaction and physical activity. The 'Employment and Economic Development' policy also outlines that outside of designated employment areas, new development will not be permitted where it causes 'harm to the amenity or operation of neighbouring uses', which implies that new employment development will not adversely affect existing physical activity destinations like active travel routes and open space.<br><br>Nonetheless, all the ‘Employment’ related policies would benefit from detail as to how opportunities for physical activity could be promoted, such as via travel plans that would be secured within new development to encourage walking or cycling to work such as via providing secure bike storage and shower facilities. However, it is anticipated this requirement will be addressed within the 'Transport' policies presented later in the Draft Local Plan. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | Mitigation will likely be provided by the Sustainable Transport and Travel policy. |
| Green Infrastructure | ? | LT | The 'Employment and Economic Development' policy outlines that outside of designated employment areas, new development will not be permitted where it causes 'harm to the amenity or operation of neighbouring uses', which implies that new employment development will not adversely affect green infrastructure assets. In addition, the 'Warner Brothers Allocation' policy proposes that land to the north of the site is used green infrastructure and public open space which is beneficial in providing new opportunities for social interaction and physical activity. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |

### B.1.4 Social and Community Facilities/ Health and Wellbeing

The assessment of Social and Community Facilities/ Health and Wellbeing Policies is presented in **Table B-4** below.

**Table B-4: HIA of Social and Community Facilities/ Health and Wellbeing Policies**

| Policy Grouping Name | Social and Community | | | | |
|---|---|---|---|---|---|
| Included Policies | Health and Wellbeing<br>Social and Community Uses | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | + | LT | Ensuring that development is well located, close to sustainable and active travel routes, is anticipated to reduce private vehicle movements, improving air quality. Additionally, ensuring Health Impact Assessments are undertaken is anticipated to ensure that air quality, and more specifically the impacts on human health, is considered within developments. If there is anticipated to be a significant adverse effect on air quality arising from development, it is anticipated that this will be mitigated against. | Older people<br>Children and young people<br>People with existing health conditions | N/A |
| Noise | + | MT | Ensuring Health Impact Assessments are undertaken is anticipated to ensure that noise, and more specifically the impacts on human health is considered within developments. If there is anticipated to be a significant adverse effect on noise arising from development, it is anticipated that this will be mitigated against. | Older people<br>Children and young people<br>People with existing health conditions | N/A |
| Housing | + | MT | There is potential that the preservation and development of new community infrastructure that is well located, accessible by sustainable transport modes, may indirectly improve the quality of housing. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |
| Economy and Employment | ? | MT | The development of new social and community infrastructure facilities has potential to provide additional high quality employment opportunities. However, this is likely to be determined by the infrastructure that is developed. Additionally, the ability for local residents to take up new employment opportunities will be dependent on the available skills in the resident population of TRDC. Where these skills are not available within current residents, roles may be filled with out of district residents, diluting the benefits to the local population. | Unemployed and low-income groups | Where possible, employment opportunities should seek to provide employment to the local population in the first instance. |
| Education and Skills | ? | LT | There is potential for new social and community infrastructure facilities to include education provision. However, it is currently unclear whether these facilities will be included within proposed developments. | Children and young people<br>Unemployed and low income groups | Further assessment should be undertaken to ensure that proposed community services meet the needs of the existing and new communities. |
| Social Cohesion and Community Safety | + | LT | The policies proposed include the preservation of existing community facilities, as well as developing new facilities. The development of such facilities may improve social cohesion and encourage those who are socially isolated to utilise facilities. Socialisation is a crucial aspect in improving the mental health and wellbeing of the population, especially those currently experiencing social isolation. New community facilities should also enhance feelings of safety through the use of passive surveillance. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | N/A |
| Access to Services | + | LT | The policies focus on both improving and preserving access to services and community facilities, which could assist in maintaining and improving the quality of life of a number of vulnerable groups, including the disabled, young people, old people, socially isolated, or those who have long term health conditions. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Socially excluded or isolated groups | Further assessment should be undertaken to ensure that proposed community services meet the needs of the existing and new communities. |

| Policy Grouping Name | Social and Community | | | | |
|---|---|---|---|---|---|
| Included Policies | Health and Wellbeing<br>Social and Community Uses | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Physical Activity | + | LT | Ensuring that development is well located, close to sustainable and active travel routes, is anticipated to encourage physical activity when accessing sites. Additionally, the Health and Wellbeing policy encourages physical exercise and that developments include accessible open space. These positive effects could potentially impact across all demographic groups. Physical activity may be indirectly encouraged by the improved accessibility and safety of open spaces as brought about by the proposed policies. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |
| Green Infrastructure | + | LT | The Health and Wellbeing policy includes the requirement for developments to develop accessible open space, alongside vegetation and landscaping. This is anticipated to improve green infrastructure provision, improving physical and mental health and wellbeing. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |

### B.1.5 Climate Change

The assessment of Climate Change Policies is presented in **Table B-5** below.

**Table B-5: HIA of Climate Change Policies**

| Policy Grouping Name | Climate Change and Net Zero | | | | |
|---|---|---|---|---|---|
| Included Policies | Flood Risk and Water Resources<br>Net Zero Operational Carbon in New Build Residential Development<br>Net Zero Operational Carbon in New Build Non-Residential Development<br>Climate-adapted Design and Construction<br>Embodied Carbon and Minimising Waste<br>Reducing Carbon Emissions in Existing Buildings | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | + | ST/LT | The climate change related polices include several design requirements that must be secured by new development to ensure air quality impacts do not accelerate climate change including the requirement for all new dwellings to meet Part L energy efficiency standards. The 'Climate-adapted Design and Construction' policy also requires development to minimise its carbon footprint and energy impact through sustainable design and construction practices such as through site location and thus reducing the emissions associated with transport.<br><br>Moreover, air quality is addressed under the 'Environment' Policies which requires applicants to undertake an air quality assessment where development would cause significant increases in emissions which in turn would identify appropriate mitigation measures where required. As such, if there is anticipated to be a significant adverse effect on air quality arising from development, it is anticipated that this will be mitigated against. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to air quality will likely be provided by the Environment related policies. |
| Noise | 0 | LT | Noise is addressed under the 'Environment' Policies which requires applicants to undertake a noises and vibration assessment where development would cause significant effects which in turn would identify appropriate mitigation measures where required. As such, if there is anticipated to be a significant adverse effect on noise arising from development, it is anticipated that this will be mitigated against. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to noise will likely be provided by the Environment related policies. |
| Housing | + | LT | The 'Net Zero Operational Carbon in New Build Residential Development' policy sets out strict measures to ensure new housing is designed to high environmental and energy efficiency standards which will make development more resilient and future-proofed towards climate change in line with national legalisation and policy. 'The 'Climate-adapted Design and Construction' policy subsequently explains that all new build developments must minimise their carbon footprint and energy impact through sustainable design and construction practices. These policies will ensure that all new housing development will be sustainably located and includes best-practice measures to reduce emissions associated with the construction process.<br><br>In addition, the 'Embodied Carbon and Minimising Waste' policy is included in the Draft Local Plan and sets limits on embodied carbon and seeks to ensure that carbon emissions are limited across the whole life cycle of a building. Thereafter, the 'Reducing Carbon Emissions in Existing Building' policy strongly encourages the decarbonisation of existing buildings through adopting a retrofit-first approach, before demolition is considered. Both the ambitions of these polices are particularly positive given a third of the district's emissions arise from existing buildings. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | N/A |
| Economy and Employment | 0 | | The policies within Climate Change are unlikely to impact upon economy and employment within TRDC. | N/A | N/A |
| Education and Skills | 0 | | The policies within Climate Change are unlikely to impact upon education and skills within TRDC. | N/A | N/A |

| Policy Grouping Name | Climate Change and Net Zero |
|---|---|
| Included Policies | Flood Risk and Water Resources<br>Net Zero Operational Carbon in New Build Residential Development<br>Net Zero Operational Carbon in New Build Non-Residential Development<br>Climate-adapted Design and Construction<br>Embodied Carbon and Minimising Waste<br>Reducing Carbon Emissions in Existing Buildings |

Health Impact Assessment

| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
|---|---|---|---|---|---|
| Social Cohesion and Community Safety | + | LT | Climate change is linked to social cohesion and community safety as climate induced impacts such as flooding can cause stress, loss of property/assets and conflict. Additionally, specific groups are more vulnerable to climate change impacts including TRDCs ageing population who are more susceptible to extreme heat and poor air quality arising from increased emissions.<br><br>Concerning flood risk, the 'Flood Risk & Water Resources' policy that explains development will not be permitted in areas identified at being at risk of flooding, only where sequential and exception tests have been undertaken and passed as necessary, whilst ensuring new development is safe and resilient to flood risk. The policy also supports development that protects and enhances water resources, taking into account climate change.<br><br>In addition, the 'Climate-adapted Design and Construction' policy includes strict measures to ensure new development is designed to high environmental and energy efficiency standards that is more resilient and future-proofed towards climate change. Moreover, other polices across the Draft Local Plan including the 'Ground Conditions, Contamination and Pollution' policy requires developments to be supported by other technical assessment such as air quality which in turn would identify further mitigation measures to ensure community safety and resilience to climate change. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation will likely be provided by the Environment related policies. |
| Access to Services | + | ST/LT | Ensuring that development is well located and close to sustainable and active travel routes is important in reducing the distance (and associated transport emissions) residents within the Three Rivers District would need to travel to access services and amenities. The 'Climate-adapted Design and Construction' policy advocates this, stating 'proposals should demonstrate efforts to reduce greenhouse gas emissions by considering factors such as site location'.<br><br>Additionally, whilst not explicitly stated under the Climate Change Policies, the 'Green Blue Infrastructure' policy contained in the Draft Local Plan explains that Public Rights of Ways and other sustainable transport links between spaces in the Green Infrastructure network should be protected and enhanced through development proposals. With reference to this policy, it is recommended that the climate changes policies advocate improvements to active travel connections/linkages to services to reduce the reliance on car use. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Where possible, opportunities to promote active travel should be encouraged within the climate change policies. |
| Physical Activity | + | ST/LT | Ensuring that development is well located and close to sustainable and active travel routes is important in reducing the distance (and associated transport emissions) residents within the district would need to travel to access housing, services and employment destinations. The 'Climate-adapted Design and Construction' policy advocates this, stating 'proposals should demonstrate efforts to reduce greenhouse gas emissions by considering factors such as site location'.<br><br>Physical activity and sustainable modes of transport is also encouraged with the 'Social and Community Facilities/Health and Wellbeing' policies. However, the climate change related policies would benefit from greater context on how improvements to active travel routes should be delivered to promote sustainable means of transport for residents. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Where possible, opportunities to promote active travel should be encouraged within the climate change policies. |

| Policy Grouping Name | Climate Change and Net Zero |
|---|---|
| Included Policies | Flood Risk and Water Resources<br>Net Zero Operational Carbon in New Build Residential Development<br>Net Zero Operational Carbon in New Build Non-Residential Development<br>Climate-adapted Design and Construction<br>Embodied Carbon and Minimising Waste<br>Reducing Carbon Emissions in Existing Buildings |

Health Impact Assessment

| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
|---|---|---|---|---|---|
| Green Infrastructure | ? | ST/LT | Green infrastructure plays an important role in addressing climate change via mitigating its causes (carbon dioxide absorption) as well as adapting to its effects including managing flood risk and reducing the urban heat island effect. The flood risk and water resources policy explains that major development in all areas will require Sustainable Drainage Systems (SuDS) which implies that green infrastructure will be used to manage surface water runoff, although, specific solutions could be outlined.<br><br>The 'Climate-adapted Design and Construction' Policy also denotes that proposals should demonstrate efforts to reduce climate change via landscaping which again implies the development of green infrastructure will be used to reduce the urban heat island and heating effects. Nonetheless, the climate change related policies would benefit from greater context on specific green infrastructure measures/strategies that should be secured by new development to address climate change, with reference to the 'Green Blue Infrastructure' policy that is presented earlier in the Draft Local Plan. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Where possible, the climate change related policies would benefit from greater context on specific green infrastructure measures/strategies that should be secured by new development to address climate change |

### B.1.6 Green Belt

The assessment of Green Belt Policies is presented in **Table B-6** below.

**Table B-6: HIA of Green Belt Policies**

| Policy Grouping Name | Green Belt | | | | |
|---|---|---|---|---|---|
| Included Policies | Green Belt | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | 0 | | The policies within Green Belt are unlikely to impact upon air quality within TRDC. | N/A | N/A |
| Noise | 0 | | The policies within Green Belt are unlikely to impact upon noise within TRDC. | N/A | N/A |
| Housing | 0 | | The policies within Green Belt are unlikely to impact upon housing within TRDC. | N/A | N/A |
| Economy and Employment | 0 | | The policies within Green Belt are unlikely to impact upon economy and employment within TRDC. | N/A | N/A |
| Education and Skills | 0 | | The policies within Green Belt are unlikely to impact upon education and skills within TRDC. | N/A | N/A |
| Social Cohesion and Community Safety | + | LT | Preservation of Green Belt land and providing opportunities for improved access is likely to improve social cohesion by providing areas which foster opportunities for socialisation. The policy will also aims to support the enhancement of landscapes, visual amenity and biodiversity, improving the quality of the Green Belt. This is most likely to benefit those who are socially isolated such as new and expectant mothers. | Children and young people<br>Socially excluded or isolated groups | N/A |
| Access to Services | + | LT | The Green Belt policy encourages measures to improve public access to the Green Belt. It is anticipated that this would include inclusively improving access, which is likely to benefit those groups who may have access limitations, particularly due to mobility constraints and affordability constraints. | People with disabilities and mobility impairment<br>People with existing health conditions<br>Unemployed and low-income groups | N/A |
| Physical Activity | + | LT | The preservation of Green Belt land and open countryside is anticipated to preserve opportunities for physical activity in this area, with people utilising these spaces for leisure and recreation. The policy will also aims to support the enhancement of landscapes, visual amenity and biodiversity, improving the quality of the Green Belt. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | Access to the Green Belt and wider countryside should be accessible for all groups inclusively. |
| Green Infrastructure | +/- | LT | This policy aims to protect the Green Belt against inappropriate development, protecting existing green infrastructure in this area. However, there is still potential for development of Green Belt land under this policy, where development meets national policy criteria. This has potential to result in loss of green infrastructure if development is to occur. | Children and young people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Socially excluded or isolated groups<br>Unemployed and low-income groups | Development located within the Green Belt should include additional green infrastructure provision, and provide open space within development. |

### B.1.7 Environment

The assessment of Environment Policies is presented in **Table B-7** below.

**Table B-7: HIA of Environment Policies**

| Policy Grouping Name | Environment | | | | |
|---|---|---|---|---|---|
| Included Policies | Waste Management and Recycling<br>Ground Conditions, Contamination and Pollution | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | + | ST/LT | The 'Ground Conditions, Contamination and Pollution' policy explains that development will not be permitted where it would have an adverse effect on air pollution levels, particularly within AQMAs. The text supporting the policy also confirms that where significant increases in air quality are proposed, a suitable assessment/modelling exercise will be required to assess impacts. The assessment should identify appropriate mitigation measures for all types of development, should any significant impacts be identified. | Older people<br>Children and young people<br>People with existing health conditions | Air quality assessments should support development where there is potential for adverse impacts to identify mitigation. |
| Noise | + | ST/LT | The 'Ground Conditions, Contamination and Pollution' policy explains that development will not be permitted where it would have an unacceptable adverse impact on the indoor or outdoor acoustic environment of existing or planned development or give rise to unacceptable vibration impacts. The supporting policy text also encourages noise-sensitive developments to be located away from existing sources of significant noise and confirms where proposals are subject to noise and/or vibration impacts, that applications are supported by a suitable assessment. The assessment should identify appropriate mitigation measures for all types of development, should any significant impacts be identified. | Older people<br>Children and young people<br>People with existing health conditions | Noise assessments should support development where there is potential for adverse impacts to identify mitigation. |
| Housing | 0 | | The policies within Environment are unlikely to impact upon housing. | N/A | N/A |
| Economy and Employment | 0 | | The policies within Environment are unlikely to impact upon economy and employment. | N/A | N/A |
| Education and Skills | 0 | | The policies within Environment are unlikely to impact upon education and skills within TRDC. | N/A | N/A |
| Social Cohesion and Community Safety | + | LT | The 'Ground Conditions, Contamination and Pollution' policy recognises the role artificial lighting plays improving local amenity and highlighting buildings and open spaces of character. This is a key addition within the policy in promoting security across the District, such that residents are able to access essential services in a safe and comfortable manner. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | N/A |
| Access to Services | 0 | | The policies within Environment are unlikely to impact upon access to services. | N/A | N/A |
| Physical Activity | 0 | | The policies within Environment are unlikely to impact upon physical activity. | N/A | N/A |
| Green Infrastructure | 0 | | The policies within Environment are unlikely to impact upon green infrastructure. | N/A | N/A |

### B.1.8 Green Blue Infrastructure

The assessment of Green Blue Infrastructure Policies is presented in **Table B-8** below.

**Table B-8: HIA of Green Blue Infrastructure Policies**

| Policy Grouping Name | Green Blue Infrastructure | | | | |
|---|---|---|---|---|---|
| Included Policies | Chiltern Beechwoods Special Area of Conservation (SAC)<br>Green Blue Infrastructure<br>Open Space, Play Space, Sport and Recreation<br>Trees, Woodlands, Hedgerows and Landscaping<br>Biodiversity<br>Landscape Character | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | + | LT | These policies are anticipated to enhance biodiversity and provide improved access to open space within the district. The community will benefit from new green and blue infrastructure as this contributes to reducing pollution, improving air quality, providing benefits to mental and physical health to residents in the district. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with long term health conditions. | N/A |
| Noise | + | LT | The community will benefit from new green and blue infrastructure as this contributes to reducing pollution and screening noise, reducing disturbance and increasing levels of tranquillity within the district. This is anticipated to provide benefits to health for local communities. | People with long term health conditions | N/A |
| Housing | 0 | | The policies within Green Blue Infrastructure are unlikely to impact upon housing within TRDC. | N/A | N/A |
| Economy and Employment | ? | MT | The development of new sports and recreation facilities has potential to provide additional employment opportunities. However, this is likely to be determined by the infrastructure that is developed. Additionally, the ability for local residents to take up new employment opportunities will be dependent on the available skills in the resident population of TRDC. Where these skills are not available within current residents, roles may be filled with out of district residents, diluting the benefits to the local population. | Unemployed and low-income groups | Where possible, employment opportunities should seek to provide employment to the local population in the first instance. |
| Education and Skills | 0 | | The policies within Green Blue Infrastructure are unlikely to impact upon education and skills within TRDC. | N/A | N/A |
| Social Cohesion and Community Safety | + | LT | Preserving existing open spaces, as well as providing new open spaces and play spaces within the district is likely to improve social cohesion by providing areas which foster opportunities for socialisation. The Open Space, Play Space, Sport and Recreation policy also contributes to reducing crime and antisocial behaviour in new and existing open spaces, as the policy requires proposals to be designed to minimise the potential for crime and antisocial behaviour. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | N/A |
| Access to Services | + | LT | The policies within Green Blue Infrastructure are anticipated to improve access to open space and sports and recreation facilities through preserving existing facilities as well as providing new facilities. | People with disabilities and mobility impairment<br>People with existing health conditions<br>Unemployed and low-income groups | N/A |

| Policy Grouping Name | Green Blue Infrastructure |
|---|---|
| Included Policies | Chiltern Beechwoods Special Area of Conservation (SAC)<br>Green Blue Infrastructure<br>Open Space, Play Space, Sport and Recreation<br>Trees, Woodlands, Hedgerows and Landscaping<br>Biodiversity<br>Landscape Character |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Physical Activity | + | LT | A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space. It is anticipated that providing new open space will encourage physical activity. Additionally, the Green and Blue Infrastructure policy encourages public rights of way and sustainable transport links between the green infrastructure network. This is likely to encourage active travel, which may also improve physical activity and health. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |
| Green Infrastructure | + | LT | The maintenance and enhancement of a greener landscape ecological value can add to sense of place. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas, particularly people seeking to manage mental health and/or stress. | Children and young people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Socially excluded or isolated groups<br>Unemployed and low-income groups | N/A |

### B.1.9 Design and Heritage

The assessment of Design and Heritage Policies is presented in **Table B-9** below.

**Table B-9: HIA of Design and Heritage Policies**

| Policy Grouping Name | Design and Heritage | | | | |
|---|---|---|---|---|---|
| Included Policies | Advertisements<br>Local Distinctiveness and Place Shaping<br>Heritage and the Historic Environment<br>Residential Design and Layout | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | + | ST/LT | Whilst air quality is not explicitly referenced within the 'Design and Heritage' polices, the 'Residential Design and Layout' section of the Draft Local Plan states that 'proposals must take opportunities to make sustainable design integral to the development (…) taking into account climate'. Thus, this implies air quality considerations will be considered within the design of new development.<br><br>The 'Design and Heritage' polices are also supported by Appendix 4: Design Criteria that establishes detailed design requirements new development must achieve to ensure the quality of the built environment is maintained. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to air quality will likely be provided by the Environment related policies. |
| Noise | + | ST/LT | The design of new development and noise is directly related given effective design mitigates noise and protects the quality of local amenity. This is addressed in the 'Local Distinctiveness and Place Shaping' policy which includes an specific section on the safeguarding of amenity that explains 'Development should protect the amenities and the attractiveness of the living environment (…) taking into account the need for adequate levels of (…) amenity.'<br><br>Several measures to ensure amenity is protected is also set out in Appendix 4: Design Criteria which explains proposals should 'provide a good standard of amenity for all occupiers'. | Unemployed and low-income groups<br>Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to noise will likely be provided by the Environment related policies. |

| Policy Grouping Name | Design and Heritage |
|---|---|
| Included Policies | Advertisements<br>Local Distinctiveness and Place Shaping<br>Heritage and the Historic Environment<br>Residential Design and Layout |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Housing | + | LT | The design of new housing is key to health given it shapes behaviours, accessibility, environmental quality, and social interactions, which represent key determinants of physical and mental wellbeing. The 'Local Distinctiveness and Place Shaping' policy includes requirements development must follow to ensure 'proposals are easy to navigate, with buildings designed and positioned to define and enhance a hierarchy of streets and spaces'. The 'Residential Design and Layout' Policy and Appendix 4: Design Criteria also sets out specific design criteria for residential development to ensure high design standards are achieved.<br><br>Thus, it is clear the draft polices strongly promote the delivery of high-quality housing by virtue of the design requirements established. | Children and young people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Socially excluded or isolated groups<br>Unemployed and low-income groups | Mitigation should be imposed to ascertain that large-scale/tall buildings include appropriate accessibility features for the elderly and for those who are disabled and have mobility impairments. High quality communal open space and shared ground floor facilities must also be delivered alongside tall buildings, such that residents are not subjected to social isolation.<br><br>In addition, the 'Residential Design and Layout' Policy would benefit from greater detail as to how those with accessibility issues will be considered in the design of new developments such as through requiring proposals to comply with The Building Regulations (2010) standards (Part M) with reference to the 'Housing Mix and Type' policy discussed earlier in the Draft Local Plan. This is particularly given the district's ageing population who necessitate increased levels of accessibility. |
| Economy and Employment | 0 | | The policies within Design and Heritage are unlikely to impact upon economy and employment within TRDC. | N/A | N/A |
| Education and Skills | 0 | | The policies within Design and Heritage are unlikely to impact upon education and skills within TRDC. | N/A | N/A |
| Social Cohesion and Community Safety | + | LT | The design of development can influence social cohesion by fostering opportunities for interaction, creating a sense of place and ensuring equal access and safety within local environments. This is addressed in the 'Local Distinctiveness and Place Shaping' policy which sets several requirements all developments must achieve including ensuring the layout of proposals are easy to navigate, with buildings designed and positioned to define and enhance a hierarchy of streets and spaces. The policy also advocates community safety by including a specific section on 'Safety and Security' which requires all development to design out opportunities for crime and anti-social behaviour.<br><br>Opportunities to promote social cohesion and community safety are also encouraged within the 'Residential Design and Layout' policy and Appendix 4: Design Criteria including the requirement to achieve appropriate levels of natural surveillance within communal areas.<br><br>In addition, the 'Heritage and Historic Environment' policy is included in the Draft Local Plan, which outlines the role the historic environment can play in 'bringing social, cultural, economic and environmental benefits to the community.' The policy seeks to protect and enhance the Three Rivers Districts heritage assets and requires applications that could impact the historic environment to be supported by a heritage impact assessment to identify suitable mitigation if required. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | N/A |

| Policy Grouping Name | Design and Heritage |
|---|---|
| Included Policies | Advertisements<br>Local Distinctiveness and Place Shaping<br>Heritage and the Historic Environment<br>Residential Design and Layout |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| | | | Thus, as is clear, the design and heritage policies seek to promote opportunities to foster social cohesion and community safety and encourage the protection and enhancement of the historic environment such that it makes a positive contribution to the local character and distinctiveness of places. | | |
| Access to Services | + | LT | The design of new development can influence access to services both through linkages/improved connections to existing amenities and via the services delivered as part of major masterplans. This is directly addressed in the 'Local Distinctiveness and Place Shaping' policy which explains that the layout of development should be designed to ensure it connects appropriately to existing street patterns and built form, and creates safe and accessible spaces, implying connections to local services will be delivered.<br><br>Furthermore, the 'Residential Design and Layout' policy states that major development will be required to provide a masterplan that is developed in accordance with the National Design Guide and National Model Design Codes. Whilst the preparation of masterplans suggests new services will be provided within major development to meet local needs, greater context be provided within the policy on the specific services that would be included within major proposals such as schools, GPs and nurseries etc. to address any local deficiencies. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | Local services should be integrated into large-scale development to meet local needs and address any deficiencies. The policy could be clearer on the type and nature of services that should be delivered within residential-led mixed-use development. |
| Physical Activity | + | LT | The design of new development can promote high levels of physical activity through the inclusion of features that promote walking, cycling and footfall within communal areas. This is comprehensively addressed within the 'Local Distinctiveness and Place Shaping' and 'Residential Design and Layout' polices which promotes:<br>• Requirements for buildings and open spaces to be designed to create a high quality public realm;<br>• Making provision for adequate lighting and for street furniture and public art;<br>•Providing appropriate levels of parking for cycles to support sustainable travel choices;<br>•Ensuring places, spaces and buildings are accessible to all potential users, including those with mobility difficulties ; and<br>• Requiring all development to meet local standards concerning the quantity and quality of amenity space delivered as set out in Appendix 4: Design Criteria. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |
| Green Infrastructure | + | LT | Green infrastructure is a key component in designing new development due to supplying multi-functional benefits in providing essential ecosystem services like flood control, whilst making the local environmental more attractive for public use. Across the 'Design and Heritage' polices the importance of high-quality design is emphasised, suggestive that green infrastructure will be delivered and protected as part of new development proposals. The 'Local Distinctiveness and Place Shaping' policy also explicitly states that green infrastructure is one of several elements that is integral to sustainable design.<br><br>Alongside the 'Green and Blue Infrastructure' policy that is presented earlier in the Draft Local Plan which seeks to achieve a net gain in the quality and quantity of Green and Blue Infrastructure delivered as part of new development, it is considered this topic is sufficiently addressed. | Children and young people<br>People with disabilities and mobility impairment<br>People with existing health conditions<br>Socially excluded or isolated groups<br>Unemployed and low-income groups | N/A |

### B.1.10 Transport and Connections

The assessment of Transport and Connections Policies is presented in **Table B-10** below.

**Table B-10: HIA of Transport and Connections Policies**

| Policy Grouping Name | Transport | | | | |
|---|---|---|---|---|---|
| Included Policies | Broadband and Electronic Communication<br>Deliveries Servicing and Construction<br>Waterways<br>Parking<br>Sustainable Transport and Travel | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | +/- | ST/LT | There is potential for these policies to result in the encouragement of utilising sustainable vehicles, due to providing supporting infrastructure for sustainable transport modes, including electric vehicle parking spaces, which is likely to reduce GHGs from private vehicles, improving air quality and the overall respiratory health of the population.<br>There is potential for the construction of developments, as well as implementing parking within developments to result in negative effects upon air quality, due to encouraging private vehicle use, as well as construction emissions, which could negatively affect vulnerable groups, including children, older people, and those with long term health conditions. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with long term health conditions. | The policy wording could also be expanded to ensure that any construction resulting in negative effects upon air quality should be appropriately mitigated within the CMP. |
| Noise | +/- | ST/LT | There is potential for these policies to result in the encouragement of utilising sustainable vehicles, which has potential to reduce road noise. However, there is potential for to encourage private vehicle use due to providing parking within new developments. Additionally, the construction of developments to result in and increase in noise, which could negatively affect the mental health of the local population through increased nuisance. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>People with long term health conditions. | The policy wording could also be expanded to ensure that any construction resulting in negative effects upon noise should be appropriately mitigated within the CMP. |
| Housing | 0 | | The policies within Transport are unlikely to impact upon housing. | N/A | N/A |
| Economy and Employment | + | MT | The Construction, Deliveries, Collections and Servicing policy seeks to support the deliveries and services that are essential to the economic growth of the district. Additionally, this policy has potential to result in employment opportunities, particularly during the construction of new developments. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |
| Education and Skills | + | LT | Improvements to broadband infrastructure for new developments will be beneficial to all district residents. Faster broadband will also be beneficial for young people, especially students who require the utility for studying. High quality broadband may also provide opportunities for education and upskilling of adults within the district who may not be able to access education in their local area. Additionally, broadband infrastructure improvements may support flexible home working, and support work life balances for all social groups. | Children and young people<br>Socially excluded or isolated groups<br>Unemployed and low-income groups | N/A |
| Social Cohesion and Community Safety | + | LT | Additionally, improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Similarly, providing infrastructure to support car clubs may aid in improving social cohesion, providing access to facilities and services, fostering community relationships.<br>The policy also includes requirements for secure cycle parking which is likely to reduce bicycle theft. This is beneficial for those who's only accessible mode of transport as a result of low-income is cycling. | Older people<br>Unemployed and low-income groups | N/A |

| Policy Grouping Name | Transport |
|---|---|
| Included Policies | Broadband and Electronic Communication<br>Deliveries Servicing and Construction<br>Waterways<br>Parking<br>Sustainable Transport and Travel |

| Health Impact Assessment | | | | | |
|---|---|---|---|---|---|
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Access to Services | + | LT | The Waterways policy has potential to result in improved public access to high quality water spaces will be beneficial to the mental wellbeing of the community in the district.<br>The Sustainable Transport and Travel policy ensures that developments are well connected to local facilities, improving accessibility for all groups, but particularly the elderly, disabled, low income groups and children, as well as those without access to private vehicles. Similarly, providing infrastructure to support car clubs may aid in improving social cohesion, providing access to facilities and services. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Unemployed and low-income groups | N/A |
| Physical Activity | + | LT | Providing improved pedestrian networks and encouraging active travel is anticipated to encourage physical activity amongst the local population by providing higher quality walking and cycling routes. This also includes ensuring cycle and walking routes to schools are of high quality, encouraging physical activity in children and young people. | All groups | N/A |
| Green Infrastructure | 0 | | The policies within Transport are unlikely to impact upon green infrastructure within TRDC. | N/A | N/A |

### B.1.11 Other Policies (Northwood Headquarters (MOD))

The assessment of Other Policies (Northwood Headquarters (MOD)) Policies is presented in **Table B-11** below.

**Table B-11: HIA of Other Policies (Northwood Headquarters (MOD)) Policies**

| Policy Grouping Name | Other Policies | | | | |
|---|---|---|---|---|---|
| Included Policies | Northwood Headquarters (MOD) | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Air Quality | - | ST/LT | New development at the Northwood Headquarters has the potential to give rise to air quality effects both during construction with respect to material transport and equipment emissions and during operation dependent on the nature of the activities proposed.<br><br>Nonetheless, new development at the Northwood Headquarters will need to be complaint with the air quality requirements set out in the 'Ground Conditions, Contamination and Pollution' policy contained in the Draft Local Plan and will likely be supported by a suitable assessment that would inform mitigation if required. | Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to air quality will likely be provided by the Environment related policies. Specifically, it is assumed that the requirement within the 'Ground Conditions, Contamination and Pollution' policy for an air assessment to inform suitable mitigation (where there is potential for adverse effects) would be adhered to as part of any forthcoming proposals at the site. |
| Noise | - | ST/LT | New development at the Northwood Headquarters has the potential to give rise to noise effects both during construction with respect to material transport and equipment emissions and during operation dependent on the nature of the activities proposed.<br><br>Nonetheless, new development at the Northwood Headquarters will need to be complaint with the noise requirements set out in the 'Ground Conditions, Contamination and Pollution' policy contained in the Draft Local Plan and will likely be supported by a suitable assessment that would inform mitigation if required. | Older people<br>Children and young people<br>People with existing health conditions | Mitigation relating to noise will likely be provided by the Environment related policies. Specifically, it is assumed that the requirement within the 'Ground Conditions, Contamination and Pollution' policy for an air assessment to inform suitable mitigation (where there is potential for adverse effects) would be adhered to as part of any forthcoming proposals at the site. |
| Housing | 0 | | The Northwood Headquarters policy is unlikely to impact upon housing. | N/A | N/A |
| Economy and Employment | + | LT | The Northwood Headquarters is key to the economy, acting as a major employer in the Three Rivers District, whilst supporting national security as a major defence asset. The operation of the headquarters also delivers positive supply chain impacts both through increased local spending and private sector contracts. The policy states that 'Non-military or non-defence related development within or in the areas around the Northwood Headquarters site will not be supported where it would adversely affect military operations or capability', which is an important addition in protecting the role the site plays in supporting the local economy.<br><br>Concerning local employment opportunities, whilst the 'Employment and Economic Development' policy presented earlier in the Draft Local Plan encourages new employment opportunities to be secured for the local population, the Northwood Headquarters would benefit from detail as to show this would be encouraged at the military site for any new development that is proposed. | Unemployed and low-income groups | Where possible, employment opportunities should seek to provide employment to the local population in the first instance. |

| Policy Grouping Name | Other Policies | | | | |
|---|---|---|---|---|---|
| Included Policies | Northwood Headquarters (MOD) | | | | |
| Health Impact Assessment | | | | | |
| Determinant of Health | Effect | Duration | Details/ Evidence | Affected Vulnerable Groups | Mitigation |
| Education and Skills | + | ST/LT | The Northwood Headquarters is key to the economy, acting as a major employer in the District and thus has the potential to secure education, skills and training opportunities as part of new employment related development at the site. | Unemployed and low-income groups<br>Socially excluded or isolated groups<br>Young people | Whilst the 'Employment and Economic Development' polices presented earlier in the Draft Local Plan seek to improve 'access to jobs, skills (...)', the Northwood Headquarters policy could encourage such opportunities to be secured at the site as part of new development proposals.<br><br>In addition, where possible, employment should seek to encourage new opportunities for education and skills. |
| Social Cohesion and Community Safety | 0 | ST/LT | Notwithstanding crime rates within the Three Rivers District being reported as low in the baseline review, the Northwood Headquarters policy would benefit on context as to how safety and security would be ensured as part of any new development proposals. This is particularly given military bases are associated with sensitive equipment, and classified information etc. that should be safeguarded in the interest of protecting the local population. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | It is acknowledged that the 'Local Distinctiveness and Place Shaping' presented earlier in the Draft Local Plan requires new development to 'Design out opportunities for crime and anti-social behaviour', however, this should be expanded upon within the Northwood Headquarters policy given the site's sensitive nature.<br><br>Specifically, the policy should require suitable mitigation to be delivered for new development at the site to prevent crime and anti-social behaviour. |
| Access to Services | 0 | ST/LT | The Northwood Headquarters policy is unlikely to impact upon access to services within TRDC. The site is an established principal military headquarters and is supported by appropriate infrastructure and service provision.<br><br>The policy also states that 'redevelopment, conversion and change of use of redundant MOD sites and buildings will be supported'. Thus, this implies new development opportunities will be advocated within the policy to strengthen the site's service offering. However, it is uncertain within the policy as to whether new facilities to meet local needs will be provided. | Children and young people<br>Older people<br>People with disabilities and mobility impairment<br>Socially excluded or isolated groups | The policy would benefit from context on the type services and facilities to be delivered at the site, particularly in relation to local needs and any deficiencies. |
| Physical Activity | 0 | ST/LT | The Northwood Headquarters policy is unlikely to impact upon green infrastructure within TRDC. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | Mitigation will likely be provided by the Sustainable Transport and Travel policy. |
| Green Infrastructure | 0 | ST/LT | The Northwood Headquarters policy is unlikely to impact upon green infrastructure within TRDC. | No specific vulnerable groups are anticipated to be affected by these policies. All residents are likely to be affected by this. | N/A |

# Appendix C EqIA Assessment Matrices

## Three Rivers District Council Local Plan

### Integrated Health and Equality Impact Assessment

**Three Rivers District Council**

SLR Project No.: 430.000113

16 January 2026

## C.1 EqIA Assessment

### C.1.1 Spatial Strategy

The assessment of Spatial Strategy is presented in Error! Reference source not found. below.

| Policy Grouping Name | Spatial Strategy | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Overall Levels of Growth<br>Infrastructure Delivery | | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation | |
| Overall Levels of Growth | +/- | +/- | 0 | + | + | + | + | 0 | +/- | This policy explains that development will be focused in sustainable locations, specifically, principal towns, small towns and large villages which have higher levels of accessibility, services and infrastructure capacity. Development is also anticipated to be at high densities to ensure that a mix of housing types and tenures, including affordable and adaptable homes, are provided.<br><br>This is beneficial to all groups in ensuring equal and ease of access to services and amenities, particularly older persons and people with disabilities who find it more difficult to travel further distances to reach access essential services.<br><br>However, text supporting this policy outlines that the Draft Local Plan will under deliver its housing need (as identified by the standard methodology). This may disproportionally impact groups whom are socially derived and younger persons/future first time buyers if this comes at the expense of affordable units, as well as older persons if the required specialist housing is not delivered. There may also be risk of displacement/reduced economic mobility if housing is not delivered near employment destinations/services (such as schools) or if first time buyers cannot buy homes near their current place of residence. | Delivering the quantified housing need (as per the standard methodology) has beneficial effects in ensuring a sufficient mix of housing types and tenures, including affordable and adaptable homes are deliver in suitable locations. Given this need is unmet in the Draft Local Plan, greater context should be included as to how TRDC's acute affordable housing and specialist accommodation needs will be delivered upon.<br><br>Mitigation should be imposed to ascertain that large-scale/tall buildings include appropriate accessibility features for the elderly and for those who are disabled and have mobility impairments. High quality communal open space and shared ground floor facilities must also be delivered alongside tall buildings, such that residents are not subjected to social isolation. | |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Infrastructure Delivery | + | + | 0 | + | + | + | + | 0 | + | This policy is anticipated to benefit the entire district given all development proposals will secure the infrastructure and services necessary to support their specific impacts. The delivery of infrastructure will also be informed by statutory providers which is important in identifying any local deficiencies (e.g. school places).<br><br>Increased access to serviced afforded by this policy is particularly beneficial to older persons and people with disabilities who find it more difficult to travel further distances to reach access essential services.<br><br>The delivery of open space and green infrastructure which is also encouraged in the policy is particularly beneficial to those who are subject to socio-economic deprivation who have less access to communal facilities. | No mitigation measures are identified. However, mitigation will likely be provided on a site-specific basis once development proposals come forward. |

### C.1.2 Sustainable Development

The assessment of Sustainable Development Policies is presented in **Table C-2** -12 below.

**Table C-2 -12: EqIA of Sustainable Development Policies**

| Policy Grouping Name | Sustainable Development |
|---|---|
| Included Policies | Housing Density<br>Provision for Gypsies, Travellers and Travelling Showpeople<br>Affordable Housing<br>Housing Mix and Type |

| Equality Impact Assessment | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Housing Density | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | Providing appropriate housing densities is anticipated to ensure that a mix of housing types and tenures, including affordable and adaptable homes, are provided. This is anticipated to positively affect elderly, disabled and those in more socio-economically deprived communities as these groups are most likely to benefit from higher density housing. | N/A |
| Provision for Gypsies, Travellers and Travelling Showpeople | 0 | 0 | 0 | 0 | + | + | 0 | 0 | + | Providing adequate provision for Gypsies, Travellers and Travelling showpeople directly benefits these groups through providing sites and improved access to local services and facilities. | Should any additional accommodation be required as a result of improvements to the existing site the council will need to consider appropriate locations for this to avoid illegal sitings. |
| Affordable Housing | + | + | 0 | + | 0 | + | 0 | 0 | + | Affordable housing provision within the District is anticipated to result in positive effects for the elderly, disabled, single parent households, racially discriminated groups and those in socio-economically deprived groups. These groups are likely to benefit from more affordable housing, including affordable adaptable and wheelchair accessible homes, ensuring homes are provided for these groups. | N/A |

| Policy Grouping Name | Sustainable Development |
|---|---|
| Included Policies | Housing Density<br>Provision for Gypsies, Travellers and Travelling Showpeople<br>Affordable Housing<br>Housing Mix and Type |

| Equality Impact Assessment | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Housing Mix and Type | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | Providing a mix of housing types and tenures is anticipated to positively affect a number of protected characteristics. A mix of housing types includes affordable housing, providing homes for those in more deprived communities. There is also anticipated to be improved supported living facilities, benefitting those with disabilities and long term health conditions. In terms of age, providing a mix of housing types that is of high quality and accessible and adaptable dwellings is anticipated to benefit older people. Additionally, this is anticipated to improve housing quality for these groups. | N/A |

### C.1.3 Employment

The assessment of Employment Policies is presented in **Table C-3** below.

**Table C-3: EqIA of Employment Policies**

| Policy Grouping Name | Employment | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Retail<br>Warner Brothers Allocation<br>Employment and Economic Development | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Retail | +/- | +/- | + | +/- | + | + | + | + | + | This policy recognises the role that town and district centres can play in supporting the local economy and encourages the development of new retail, leisure and other town centre uses to increase local expenditure.<br><br>The policy is beneficial to all groups especially those who are dependent on retail for employment and those who use high streets/town centre to access essential services. However, people with mobility impairments such as the elderly and those who are disabled may be negatively impacted if suitable accessibility measures are not delivered. This could include ensuring parking spaces are developed in close proximity to shop/retail entrances. | The policy would benefit from greater context on town centre viability, particularly in more deprived areas (like South Oxhey for instance) where there may be a requirement for more creative solutions (e.g. a shift focus from just retail to mixed uses) to develop and regenerate the town centre. This is such that those subject to socio-economic deprivation are not disproportionately impacted.<br><br>The policy should also more greatly encourage new retail development to include accessibility measures for those who have mobility and visual impairments. |

| Policy Grouping Name | Employment |
|---|---|
| Included Policies | Retail<br>Warner Brothers Allocation<br>Employment and Economic Development |

Equality Impact Assessment

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Warner Brothers Allocation | +/- | +/- | + | +/- | + | + | + | + | +/- | This policy is anticipated to provide an economic boost to the local economy as well as deliver new employment opportunities, which is particularly beneficial to those who are subject to socio-economic deprivation and those who are unemployed. However, residents subject to socio-economic deprivation may need to attain appropriate skills/qualifications to gain employment, depending on the nature of the roles created.<br><br>The policy also includes no detail as to how employees will be procured and how equal opportunities will be made to ensure all groups are not deterred from applying for future positions at the site (such as implementing appropriate accessibility provisions for those with physical disabilities).<br><br>In addition, the policy proposes that land to the north of the site is used green infrastructure and public open space. This is beneficial to all groups given new opportunities for social interaction and physical activity will be provided.<br><br>The site is also located in an established residential and commercial area and may disproportionately effect nearby residential receptors, particularly residences that contain children/younger and older persons, people with disabilities and those who are pregnant/in maternity who are likely to spend longer periods at home compared to those that economically active and absent during the work day. This is because such groups would be greater exposed to construction impacts (i.e. increased transport) and operational impacts. | Consideration should be given to how equal opportunities will be made for all groups applying for future employment positions at the Site. This could be considered with a health impact assessment which is a requirement for non-residential developments of 1000sqm within the Draft Local Plan.<br><br>Mitigation should also be imposed to ensure development at the site does not give rise to adverse impacts during construction and operation. However, it is anticipated that this will be addressed by other policy including the 'Ground Conditions, Contamination and Pollution' section of the Draft Local Plan. |
| Employment and Economic Development | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | This policy is anticipated to deliver new employment and economic development opportunities to meet the need for a range of employment uses including office, industry and warehousing, public and community, leisure and tourism and town centre.<br><br>New employment space is likely to benefit all groups through having a positive multiplier effect in encouraging new investment streams and providing new employment opportunities. This is particularly beneficial to those who are subject to socio-economic deprivation and those who are unemployed.<br><br>However, new employment related development should include accessibility such that all groups have equal opportunities in applying and working in future jobs afforded by employment development. | New employment development could be encouraged along major public transport routes such that young people and those suffering from socio-economic deprivation who do not have use of private vehicles can access employment destinations.<br><br>Consideration should also be given to how equal opportunities will be made for all groups applying for positions afforded by employment related development. This could be considered with a health impact assessment which is a requirement for non-residential developments of 1000sqm within the Draft Local Plan. |

### C.1.4 Social and Community Facilities/ Health and Wellbeing

The assessment of Social and Community Facilities/ Health and Wellbeing Policies is presented in **TableC-4** below.

**TableC-4: EqIA of Social and Community Facilities/ Health and Wellbeing Policies**

| Policy Grouping Name | Social and Community | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Health and Wellbeing<br>Social and Community Uses | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Health and Wellbeing | + | + | + | + | + | + | + | + | + | This policy is anticipated to ensure development provides access to accessible open space and sports and recreation facilities, which is likely to positively effect children and young people, as well as disabled users. These facilities also include free to access facilities such as open spaces, benefitting those who may not be able to afford private memberships to recreational facilities. Additionally, new health facilities being well located close to sustainable transport options and accessible to all community members is anticipated to result in improved access for deprived groups, elderly and disabled users.<br>There is potential for safe walking and cycling routes to reduce fear of discrimination and improve feelings of safety. However, these effects are likely to be determined by individual scheme design. | Where possible, walking and cycling routes should be designed to incorporate designing out crime principles, including being well lit, and provide clear sightlines.<br>Active travel infrastructure should be accessible and inclusive.<br>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.<br>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users. |
| Social and Community Uses | + | + | 0 | + | + | + | 0 | 0 | + | The development of new, accessible community facilities has potential to improve senses of community for a number of groups, however, this is likely to be determined by the nature of community infrastructure that is put forward, and the services provided.<br>Providing new school sports facilities that are accessible, as well as including public uses, is anticipated to improve access to these facilities for children and young people, disabled users, and those who are more socio-economically deprived. | Community infrastructure services should aim to provide a range of services across the district, including spaces that can be utilised for support groups or cultural activities.<br>Community engagement should be undertaken to identify the needs of both the new and existing communities. |

### C.1.5 Climate Change

The assessment of Climate Change Policies is presented in **Table C-5** below.

**Table C-5: EqIA of Climate Change Policies**

| Policy Grouping Name | Climate Change | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Flood Risk and Water Resources<br>Net Zero Operational Carbon in New Build Residential Development<br>Net Zero Operational Carbon in New Build Non-Residential Development<br>Climate-adapted Design and Construction<br>Embodied Carbon and Minimising Waste<br>Reducing Carbon Emissions in Existing Buildings | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Flood Risk and Water Resources | + | + | 0 | + | 0 | + | 0 | 0 | + | This policy is anticipated to enhance climate resilience across the District through ensuring flood risk in duly considered within planning applications. The policy also restricts development that would adversely impact water resources, whilst promoting opportunities to upgrade wastewater infrastructure.<br><br>The policy will have positive impacts for most groups, particularly people that are subject to higher levels of socio-economic deprivation who are more often located in areas more vulnerable to higher flood risk and have less infrastructure protection against flood events. | No mitigation measures are identified. However, mitigation will likely be provided on a site-specific basis once development proposals come forward. |
| Net Zero Operational Carbon in New Build Residential Development | + | + | 0 | + | 0 | + | 0 | 0 | + | This policy is anticipated to ensure new residential developments are designed to high environmental standards and are compliant with building regulations in terms of reducing energy consumption, whilst allowing for climate adaptation.<br><br>The policy will have positive impacts for most groups in reducing the costs of energy, particularly those who are subject to higher levels of socio-economic deprivation with lower incomes. Costs savings arising from reduced energy consumption may also reduce anxiety/stress associated with the increasing costs of living.<br><br>Furthermore, the delivery of net zero carbon buildings and infrastructure will have positive benefits on resident health due to reducing exposure to the cold and harmful emissions. This is beneficial to all groups, particularly children/younger and older persons, those with disabilities and those who are pregnant/in maternity. This is because such groups are more susceptible to the health effects of pollution. | No mitigation measures are identified. However, mitigation will likely be provided on a site-specific basis once development proposals come forward. |

| Policy Grouping Name | Climate Change |
|---|---|
| Included Policies | Flood Risk and Water Resources<br>Net Zero Operational Carbon in New Build Residential Development<br>Net Zero Operational Carbon in New Build Non-Residential Development<br>Climate-adapted Design and Construction<br>Embodied Carbon and Minimising Waste<br>Reducing Carbon Emissions in Existing Buildings |

Equality Impact Assessment

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Net Zero Operational Carbon in New Build Non-Residential Development | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | This policy is anticipated to ensure non-residential developments are designed to high environmental standards and drive significant improvements in energy efficiency to support TRDC's ambition to become carbon neutral.<br><br>Similar to the 'Net Zero Operational Carbon in New Build Residential Development' policy, the delivery of Net Zero carbon buildings and infrastructure will have positive benefits on resident health due to lessening exposure to harmful emissions, whilst also contributing to a reduction in energy bills.<br><br>The policy also encourages the use of on-site renewable energy which may bring new employment opportunities to meet this ambition. This may be most beneficial to those suffering from socio-economic deprivation and those who are unemployed. | No mitigation measures are identified. However, mitigation will likely be provided on a site-specific basis once development proposals come forward. |
| Climate-adapted Design and Construction | + | + | 0 | + | 0 | + | 0 | 0 | + | This policy is anticipated to ensure proposals are underpinned by a climate-adapted design and that the construction of development minimises its carbon footprint.<br><br>This policy will have positive impacts for all groups for the similar reasons discussed in the columns above by reducing exposure to harmful emissions, whilst also contributing to a reduction in energy bills.<br><br>The policy also requires development to prevent overheating through following a 'cooling hierarchy'. This is beneficial to all groups, especially children/younger and older persons, those with disabilities and those who are pregnant/in maternity. This is because such groups are more susceptible to the health effects associated with increased temperatures and extreme heat. | No mitigation measures are identified. However, mitigation will likely be provided on a site-specific basis once development proposals come forward. |
| Embodied Carbon and Minimising Waste | + | + | 0 | + | 0 | + | 0 | 0 | + | This policy is anticipated to reduce the embodied carbon associated with materials and construction processes throughout the whole lifecycle of buildings and infrastructure within the Three Rivers District.<br><br>Through reducing emissions, the policy will be beneficial to all groups, particularly children/younger and older persons, those with disabilities and those who are pregnant. This is because such groups are more susceptible to the health effects of emissions associated with materials and construction processes. | Major development should be subject to a Whole Life Carbon Assessment to ensure embodied carbon is reported and assessed. |

| Policy Grouping Name | Climate Change |
|---|---|
| Included Policies | Flood Risk and Water Resources<br>Net Zero Operational Carbon in New Build Residential Development<br>Net Zero Operational Carbon in New Build Non-Residential Development<br>Climate-adapted Design and Construction<br>Embodied Carbon and Minimising Waste<br>Reducing Carbon Emissions in Existing Buildings |

Equality Impact Assessment

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Reducing Carbon Emissions in Existing Buildings | + | + | 0 | + | + | + | 0 | 0 | + | Retrofitting existing buildings, especially housing will reduce energy consumption and lessen energy bills. This will have positive impacts for all groups, particularly those who are subject to higher levels of socio-economic deprivation with lower incomes.<br><br>Retrofitting and decarbonisation will also ensure the longevity of existing buildings and reduce maintenance costs. This may be particularly beneficial to socio-economically deprived groups, younger people and first time buyers whom are looking to gain access onto the property ladder.<br><br>In addition, the policy places an emphasis on making heritage assets adaptive and resilient to climate change. This is likely to contribute to securing the longevity of the historic environment which will benefit all groups. This is given the historic environment can foster a sense of place and serve as destinations for social interaction. | Subsides to facilitate low-income groups in undertaking retrofitting should be considered. |

### C.1.6 Green Belt

The assessment of Green Belt Policies is presented in **Table C-6** below.

**Table C-6: EqIA of Green Belt Policies**

| Policy Grouping Name | Green Belt | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Green Belt | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Green Belt | + | + | 0 | + | 0 | 0 | 0 | 0 | + | Preserving Green Belt and open countryside is likely to benefit younger people and parents, providing informal recreation space for children and young people. Additionally, these spaces provide areas for mental health management and relieving stress. Green Belt land, can provide people living in more deprived communities with access to informal open space. | Access to the Green Belt and wider countryside should be accessible for all groups inclusively. |

### C.1.7 Environment

The assessment of Environment Policies is presented in **Table C-7** below.

**Table C-7: EqIA of Environment Policies**

| Policy Grouping Name | Environment | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Waste Management and Recycling<br>Ground Conditions, Contamination and Pollution | | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation | |
| Waste Management and Recycling | +/- | +/- | 0 | +/- | 0 | 0 | 0 | 0 | 0 | This policy is anticipated to ensure development provides appropriate waste and recycling facilities for all residents and employment uses which will ensure high environmental conditions are maintained which will benefit all groups.<br><br>However, groups with disability, older people and those who are pregnant/in maternity which may have mobility issues may be disproportionately affected if provisions are not in place to ensure safe and equal access. This may include where refuse and recycling facilities are situated at a considerable distance away from properties.<br><br>The policy also seeks to reduce waste through encouraging the re-use of materials and delivering upon the circular economy principles. This is beneficial to all groups given by fostering an cleaner environment, with reduced emissions. | Provision of refuse and recycling facilities and collection points should be situated in locations that are accessible for those with mobility disabilities and be within a reasonable distance from dwellings. Features such as ramps and raised pavements should be considered within specialist housing/homes for older persons. | |

| Policy Grouping Name | Environment |
|---|---|
| Included Policies | Waste Management and Recycling<br>Ground Conditions, Contamination and Pollution |

| Equality Impact Assessment | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Ground Conditions, Contamination and Pollution | + | + | 0 | + | 0 | 0 | 0 | 0 | + | This policy is anticipated to ensure new development does not put residents and communities at risk of unacceptable levels of ground, air, water, light or noise pollution, odour, vibration, disturbance or land instability. The policy recommends that suitable assessments support development proposals for the following environmental considerations:<br>• Waste<br>• Ground Conditions;<br>• Air Quality;<br>• Noise and Vibration; and<br>•Lighting<br>The assessment will thereafter inform suitable mitigation to ensure no adverse effects materialise. This is beneficial to all groups, particularly children/younger and older persons, those with disabilities and those who are pregnant/in maternity. This is because such groups are more susceptible to the health effects of pollution.<br><br>Groups suffering from socio-economic deprivation, particularly those unemployed are also vulnerable and will benefit from pollution mitigation. This is because those unemployed will likely spend longer periods at home and be more exposed to the pollution arising from new development. | None - however, the mitigation identified in the technical assessments (waste, ground conditions, air quality, noise and vibration and lighting) supporting development proposals should be implemented to ensure all groups are not exposed to unacceptable levels of pollution. |

### C.1.8 Green Blue Infrastructure

The assessment of Green Blue Infrastructure Policies is presented in **Table C-8** below.

**Table C-8: EqIA of Green Blue Infrastructure Policies**

| Policy Grouping Name | Green Blue Infrastructure |
|---|---|
| Included Policies | Chiltern Beechwoods Special Area of Conservation (SAC)<br>Green Blue Infrastructure<br>Open Space, Play Space, Sport and Recreation<br>Trees, Woodlands, Hedgerows and Landscaping<br>Biodiversity<br>Landscape Character |

| Equality Impact Assessment | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Chiltern Beechwoods Special Area of Conservation (SAC) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | N/A | N/A |
| Green Blue Infrastructure | + | + | 0 | + | 0 | 0 | 0 | 0 | + | The community will benefit from new green and blue infrastructure as this contributes to reducing pollution, improving air quality, enhancing biodiversity, screening noise, improving natural drainage, reducing flood risk, providing benefits to mental and physical health.<br>Access to open space is particularly beneficial to low income groups who may not have access to privately owned green space.<br>Green spaces, particularly those with play spaces included are also beneficial to parents with young children as it enables them to access opportunities for both physical activity and socialisation.<br>The development of new Green and Blue infrastructure is required to be accessible and safe, improving safety for children and parents utilising these spaces, as well as improving access for users with mobility restrictions. | No mitigation measures have been outlined. Mitigation measures are likely to be based on site specific information once development sites have come forward. |

| Policy Grouping Name | Green Blue Infrastructure |
|---|---|
| Included Policies | Chiltern Beechwoods Special Area of Conservation (SAC)<br>Green Blue Infrastructure<br>Open Space, Play Space, Sport and Recreation<br>Trees, Woodlands, Hedgerows and Landscaping<br>Biodiversity<br>Landscape Character |

Equality Impact Assessment

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Open Space, Play Space, Sport and Recreation | + | + | 0 | + | 0 | 0 | 0 | 0 | + | There is potential for the preservation of existing open and play space to protect this community asset. The development of new infrastructure for public use likely to benefit those in more deprived communities, who may not be able to access these spaces through private memberships.<br>Ensuring the design of new open spaces and sports facilities is in line with Sports England and British Standards anticipated to improve accessibility to these spaces, as well as ensuring a high standard of design for users.<br>Providing play facilities is also anticipated to benefit children and pregnancy and maternity, providing spaces for physical activity and socialisation. | New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions. Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces. Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the district. |
| Trees, Woodlands, Hedgerows and Landscaping | + | + | 0 | + | 0 | 0 | 0 | 0 | + | Additional planting around the district will improve the environmental surroundings, contributing to improved mental wellbeing for all community members. Additional tree planting and landscaping is anticipated to contribute to a greener landscape which will benefit people living in high density residential areas who may not have access to private gardens or outside space. | Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the district. |
| Biodiversity | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | + | Implementing Biodiversity Net Gain (BNG) is likely to benefit all community members.<br>The maintenance and enhancement of a greener landscape can add to sense of place. Improved environmental surroundings will likely generate positive impacts on mental health, particularly people seeking to manage mental health and/or stress. A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space. | When implementing BNG, where practicable, sensory planting should be encouraged to aid the neurodiverse population in the district. |

| Policy Grouping Name | Green Blue Infrastructure |
|---|---|
| Included Policies | Chiltern Beechwoods Special Area of Conservation (SAC)<br>Green Blue Infrastructure<br>Open Space, Play Space, Sport and Recreation<br>Trees, Woodlands, Hedgerows and Landscaping<br>Biodiversity<br>Landscape Character |

| Equality Impact Assessment | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Landscape Character | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | Improving access to national landscapes and landscape regions will benefit people living in high density residential areas who may not have access to private gardens or outside space. | Enhancements to public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used. |

### C.1.9 Design and Heritage

The assessment of Design and Heritage Policies is presented in **Table C-9** below.

**Table C-9: EqIA of Design and Heritage Policies**

| Policy Grouping Name | Design and Heritage | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Advertisements<br>Local Distinctiveness and Place Shaping<br>Heritage and the Historic Environment<br>Residential Design and Layout | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Advertisements | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | This policy is anticipated to ensure all advertisements and signs do not compromise amenity and public safety and are sympathetic to the character or setting of local environments. The policy also seeks to ensure all advertisements are appropriately sited which is important in ensuring those with disabilities are able to engage with the content.<br><br>The nature of the content within advertisements can cause offence and discrimination, however, this draft policy outlines that the material advertised is not a planning matter. | Whilst not a planning matter, advertisements and signs should be encouraged to be appropriate and to not include harmful and offensive content through an permissive policy approach. |
| Local Distinctiveness and Place Shaping | + | + | + | + | + | + | + | + | + | This policy is likely to improve the design quality of new development particularly through creating a strong sense of place and ensuring residents have access to a highly accessible and safe environment and public realm.<br><br>The safety and security requirements set out in the policy that seek to design out crime are beneficial to all groups, particularly younger/old people, those with disability, women, LGBTQ+ people and people with different ethnicities who are typically more vulnerable to anti-social behaviour, especially during night time.<br><br>The accessibility and inclusion requirements established in the policy are also beneficial to older people and those with disabilities in ensuring that such groups are able to use and interact with communal spaces.<br><br>In addition, the emphasis the policy places on creating a distinct local character and sense of place is important in ensuring all groups, especially those who are often more marginalised (such as different ethnicities and LGBTQ+ people) feel safe and comfortable using public and communal spaces provided within new development. | No mitigation measures are identified. However, mitigation will likely be provided on a site-specific basis once development proposals come forward. |

| Policy Grouping Name | Design and Heritage |
|---|---|
| Included Policies | Advertisements<br>Local Distinctiveness and Place Shaping<br>Heritage and the Historic Environment<br>Residential Design and Layout |

| Equality Impact Assessment | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Heritage and the Historic Environment | + | 0 | 0 | 0 | + | + | 0 | 0 | 0 | This policy is anticipated to ensure that the historic environment will be preserved and enhanced in a manner appropriate to its significance. This is likely to benefit all members of the community given historic environments can foster a sense of place and serve as destinations for social interaction. This is emphasised within the text supporting the policy which states the historic environment is 'an important resource bringing social, cultural, economic and environmental benefits to the community.' | N/A |
| Residential Design and Layout | + | + | 0 | + | + | + | 0 | + | + | This policy is likely to improve the design quality of housing development particularly through improving the privacy for residents, ensuring houses are designed to appropriate spaces standards and via providing appropriate residential amenity space. The policy is also supported by Appendix 4: Design Criteria that establishes detailed design requirements new development must achieve.<br><br>Requiring housing development to meet high residential and amenity standards is beneficial to the elderly and disabled groups in ensuring users can move easily within buildings and associated communal space.<br><br>The policy also seeks to prevent tall buildings from infringing upon the amenity of the surrounding area, whilst being appropriate to its surroundings in terms of scale and form. This is beneficial in preventing social isolation, particularly for children/younger and older persons, people with disabilities and those who are pregnant/in maternity who spend greater periods at home.<br><br>In addition, the policy requires major development proposals to be supported by an a masterplan that is developed in accordance with the National Design Guide and National Model Design Codes. This implies that large-scale housing will include services to meet local needs such as schools, GPs etc. This is beneficial for older persons and people with disabilities who find it more difficult to travel further distances to reach access essential services. | Mitigation should be imposed to ascertain that large-scale/tall buildings include appropriate accessibility features for the elderly and for those who are disabled and have mobility impairments. High quality communal open space and shared ground floor facilities must also be delivered alongside tall buildings, such that residents are not subjected to social isolation.<br><br>Development should meet Part M of the Building Regulations (2010) standards. However, it is acknowledged that this is addressed within the 'Housing Mix and Type' and 'Affordable Housing' polices presented in the Draft Local Plan.<br><br>Furthermore, local services should be integrated into large-scale development to meet local needs and address any deficiencies. The policy could be clearer on the type and nature of services that should be delivered within residential-led mixed-use development. |

### C.1.10 Transport and Connections

The assessment of Transport and Connections Policies is presented in **Table C-10**: below.

**Table C-10: EqIA of Transport and Connections Policies**

| Policy Grouping Name | Transport | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Broadband and Electronic Communication<br>Deliveries Servicing and Construction<br>Waterways<br>Parking<br>Sustainable Transport and Travel | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Broadband and Electronic Communication | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | Improvements to broadband infrastructure for new developments will be beneficial to all district residents. Additionally, improved broadband connections will be beneficial to elderly people suffering from social isolation as well as disabled users. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for studying. Additionally, broadband infrastructure improvements may support flexible home working, and support work life balances for all social groups, particularly affecting those in more deprived communities. | Those living in social housing should be made aware of government-backed social tariffs for broadband, aiding in improving broadband connections for these communities. |
| Deliveries Servicing and Construction | ? | ? | 0 | ? | 0 | 0 | 0 | 0 | 0 | There is potential for the construction of developments to result in negative effects upon air quality and noise, which could negatively affect children, older people, those with long term health conditions, and pregnant people. Additionally, introductions of road diversions during construction could cause confusion amongst road users, particularly elderly users. It could also lead to severance and driver delays making access to local services more challenging.<br>Whilst this policy includes the implementation of a Construction Environmental Management Plan (CEMP), this does not consider mitigation measures for all developments. | The policy could be expanded to ensure that developments requiring routing changes communicate changes to the local community in advance of works, as well as ensuring diversion routes do not cause undue confusion amongst road users.<br>The policy could also be expanded to ensure that any construction resulting in negative effects upon air quality and noise should be appropriately mitigated |
| Waterways | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | This policy has potential to result in improved public access to high quality water spaces will be beneficial to the mental wellbeing of the community in the district. | Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used. |

| | |
|---|---|
| Policy Grouping Name | Transport |
| Included Policies | Broadband and Electronic Communication<br>Deliveries Servicing and Construction<br>Waterways<br>Parking<br>Sustainable Transport and Travel |

Equality Impact Assessment

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Parking | +/- | +/- | 0 | +/- | 0 | 0 | 0 | 0 | + | This policy involves the provision of parking for new developments and aims to minimise adverse effects from on street parking on road safety. The policy also involves the provision of electric vehicle (EV) charging points, as well as the potential for car club if deemed appropriate. If developed, car clubs can provide opportunities for those who do not own private vehicles.<br>The policy also includes requirements for secure cycle parking which is likely to reduce bicycle theft. This is beneficial for those who's only accessible mode of transport as a result of low-income is cycling.<br>There is potential for this policy to result in the encouragement of sustainable vehicles usage, which is likely to reduce GHGs from private vehicles, improving air quality and the overall respiratory health of the population. Provision is also supported for disabled parking.<br>However, there is potential that EV charging can present barriers to the elderly, those with disabilities, and those with pushchairs through trailing cables, and parking bays being too narrow. | Cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes, in line with LTN 1/20 Cycle Infrastructure Design. Management should protect priority bays to maintain accessibility for protected groups.<br>EV charging points should adhere to the British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022). |

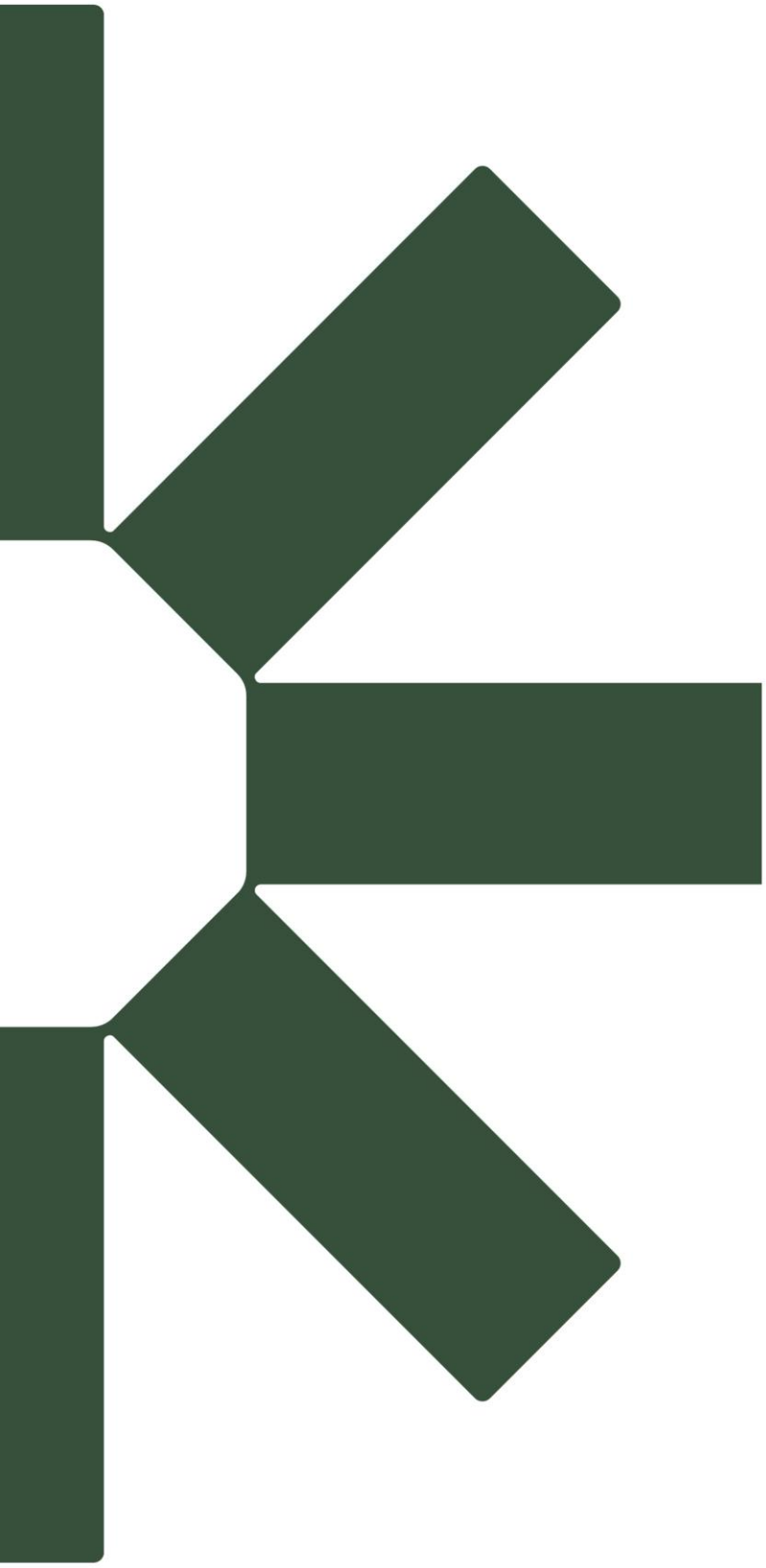
| | |
|---|---|
| Policy Grouping Name | Transport |
| Included Policies | Broadband and Electronic Communication<br>Deliveries Servicing and Construction<br>Waterways<br>Parking<br>Sustainable Transport and Travel |

Equality Impact Assessment

| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Sustainable Transport and Travel | + | + | 0 | + | 0 | 0 | 0 | 0 | + | This policy is anticipated to improve the accessibility and safety of multiple transport modes, including vehicle, pedestrian, cycle and public transport. This also includes ensuring that developments are well connected to local facilities, improving accessibility for all groups, but particularly the elderly, disabled, and children, as well as those without access to private vehicles. Additionally, providing permeable site layouts may further improve accessibility, particularly for the elderly, and people with disabilities or long term health conditions. Providing improved cycle and walking routes to schools is also likely to benefit local children and those accompanying children to school.<br>There is potential for this policy to result in the encouragement of sustainable vehicles usage, which is likely to reduce GHGs from private vehicles, improving air quality and the overall respiratory health of the population. | Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.<br>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles. It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters.<br>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.<br>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that residents are not required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. |

### C.1.11 Other Policies (Northwood Headquarters (MOD))

The assessment of Other Policies (Northwood Headquarters (MOD)) Policies is presented in **Table C-11** below.

**Table C-11: EqIA of Other Policies (Northwood Headquarters (MOD)) Policies**

| Policy Grouping Name | Other Policies | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Included Policies | Northwood Headquarters (MOD) | | | | | | | | | | | |
| Equality Impact Assessment | | | | | | | | | | | | |
| Policy | Age | Disability | Gender Reassignment | Pregnancy and Maternity | Religion or Belief | Race | Sex | Sexual Orientation | Socio-economic Status | Summary of Effects | Mitigation |
| Northwood Headquarters (MOD) | +/- | +/- | 0 | +/- | 0 | 0 | 0 | 0 | + | The Northwood Headquarters is key to the economy, acting as an major employer in the Three Rivers District and the proposed policy advocates that new development at the site should enhance and/or sustain its operational capability.<br><br>This is anticipated to provide an economic boost to the local economy as well as deliver new employment opportunities for the District, which is particularly beneficial to those who are subject to socio-economic deprivation and may be unemployed. However, those subject to socio-economic deprivation may need to attain appropriate skills/ qualifications to gain employment at the site.<br><br>The policy also includes no detail as to how employees will be procured and how equal opportunities will be made to ensure all groups are not deterred from applying for future positions at the site (such as implementing appropriate accessibility provisions for those with physical disabilities).<br><br>In addition, the site is located in an established suburban town and new development may disproportionately effect nearby residential receptors, particularly residences that contain children/younger and older persons, people with disabilities and those who are pregnant/in maternity who spend greater periods at home compared to those that are economically active and absent during the working day. This is because such groups would be greater exposed to construction impacts (i.e. increased transport) and operational impacts. | Consideration should be given to how equal opportunities will be made for all groups applying for future employment positions at the site. This could be considered with a health impact assessment which is a requirement for non-residential developments of 1000sqm within the Draft Local Plan.<br><br>Mitigation should also be imposed to ensure development at the site does not give rise to adverse impacts during construction and operation. However, it is anticipated that this will be addressed by other policy including the 'Ground Conditions, Contamination and Pollution' section of the Draft Local Plan. |