
LOCAL PLAN SUB-COMMITTEE

VIRTUAL MEETING NOTICE AND AGENDA

For a virtual/remote meeting to be held on Thursday, 8 August 2024 at 7.00 pm

Members of the Planning Committee:-

Councillors:

Stephen Giles-Medhurst (Chair)
Christopher Alley
Oliver Cooper
Stephen Cox
Steve Drury

Louise Price (Vice-Chair)
Philip Hearn
Chris Mitchell
Sarah Nelmes
Andrew Scarth

*Joanne Wagstaffe, Chief Executive
Wednesday, 31 July 2024*

“The Local Authorities and Police and Crime Panels Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 made under the Coronavirus Act 2020 enable Council / Committee meetings to be held in a virtual format and enables remote attendance.

The meeting will start at 7.30pm and will be virtual / remote, in that they will be conducted at no specific location and all participants are at various locations, communicating via audio and online.

The Council welcomes contributions from Members of the public to its discussion on agenda items at Planning Committee meetings. Contributions will be limited to one person speaking for and one against each item for not more than three minutes. Please note that 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 automatically be given the right to speak on the item at that next meeting of the Committee. Details of the procedure are provided below:

Members of the public wishing to speak will be entitled to register and identify which application(s) they wish to speak on from the published agenda for the remote meeting. Those who wish to register to speak must do so by notifying the Committee team by e-mail (CommitteeTeam@threerivers.gov.uk) 48 hours before the meeting. The first 2 people to register on any application (1 for and 1 against) will be sent a link so that they can join the meeting to exercise that right. This will also allow the Committee Team to prepare the speaker sheet in advance of the remote meeting to forward to the Chair of the meeting.

In accordance with The Openness of Local Government Bodies Regulations 2014 any matters considered under Part 1 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 Act and the laws of libel and defamation.

Please note that the meeting is being held virtually. The business of the meeting will be live streamed at –

The Planning Committee virtual meeting protocol can be viewed below:

1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2. MINUTES

To confirm as a correct record, the minutes of the Local Plan Sub-Committee meeting held on 16 July.

(Pages 5
- 10)

3. NOTICE OF OTHER BUSINESS

Items of other business notified under Council Procedure Rule 30 to be announced, together with the special circumstances that justify their consideration as a matter of urgency. The Chairman to rule on the admission of such items.

4. DECLARATION OF INTERESTS

To receive any declaration of interests.

5. LOCAL PLAN: UPDATED POLICIES FOLLOWING REGULATION 18 CONSULTATION

This report seeks member agreement of the updates to the draft Local Plan policies from the Draft Local Plan Regulation 18 Part 1: Preferred Policy Options document in response to changes to national planning policy, comments received to the Regulation 18 consultation and consideration at Local Plan Sub-Committee meetings in 2022 and 2023.

(Pages
11 - 76)

Recommendation:

That the Local Plan Sub-Committee note the contents of this report, and recommend to the Policy & Resources Committee the following policy updates:

- **Chilterns Beechwoods SAC Policy (Appendix 1)**
- **Northwood Headquarters MOD Policy (Appendix 2)**

- Residential Design and Layout Policy (Appendix 3)
- Local Distinctiveness and Place Shaping Policy (Appendix 4)
- Heritage and Historic Environment Policy (Appendix 5)
- Social and Community Uses Policy (Appendix 6)
- Flood Risk and Water Resources Policy (Appendix 7)
- Ground Conditions, Contamination and Pollution Policy (Appendix 8)
- Waste Management and Recycling Policy (Appendix 9)
- Landscape Character Policy (Appendix 10)
- Advertisements Policy (Appendix 11)
- Deliveries, Servicing and Construction Policy (Appendix 12)

6. OTHER BUSINESS - If approved under item 3 above.

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

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THREE RIVERS DISTRICT COUNCIL

At a meeting of the Local Plan Sub-Committee held virtually remotely on Tuesday, 16 July 2024 from 7.00 - 9.10 pm

Present: Councillors Stephen Giles-Medhurst (Chair), Councillor Louise Price, Christopher Alley, Oliver Cooper, Stephen Cox, Steve Drury, Philip Hearn, Chris Mitchell, Sarah Nelmes and Andrew Scarth

Also in Attendance:

Councillor Sara Bedford

Officers in Attendance:

Marko Kalik, Head of Planning Policy and Conservation
Aaron Roberts, Senior Planning Officer
Sharon Keenlyside, Interim Senior Planning Officer

External in Attendance:

Matthew Bedford
Jon Bishop, Chorleywood Residents Association

LPSC23/23 APOLOGIES FOR ABSENCE

There were none.

LPSC24/23 MINUTES

It was confirmed that the minutes of the meeting held on 24 August 2023 were a correct record and would be signed by the Chair.

LPSC25/23 NOTICE OF OTHER BUSINESS

There was none

LPSC26/23 DECLARATION OF INTERESTS

There was none.

LPSC27/23 LOCAL PLAN REGULATION 18 PART FOUR CONSULTATION SUMMARY, NON-HOUSING SITES AND BEDMOND VILLAGE GROWTH OPTIONS

The Chair had circulated to Members of the sub-committee a proposed amendment to the Officer's recommendations published in the report.

The proposed recommendations from the Chair were as follows:

That the Local Plan Sub Committee:

1. Note the contents of this report and the required further work.
2. Agree the Lower Growth and Green Belt restraint option, that received over 90% public support, where only sites in areas of moderate Green Belt harm or less, as set out in the Stage 2 Green Belt Review, are considered acceptable for residential development continues to be Council's position.

3. Agree the non-housing allocations as set out in this report except for CFS 11 (Carpenders Park Farm, Oxhey Lane) where officers are to require Hertfordshire County Council, as the education authority, to substantiate their requirement for this site with evidence for a 10fe secondary Low Growth option of this authority and report back.
4. That officers work further with Hertfordshire County Council over the Countys' identified need for a secondary school, but not yet a site, in the Abbots Langley/ Kings Langley area.
5. Agree the inseting of Bedmond within the Green Belt as established via the Stage 1 Green Belt Review and as required by para 140 of the NPPF
6. Agree to site CFS10 NOT being allocated in addition to the two Bedmond sites included in the Regulation 18 Part 4 Lower Housing Growth Option.

The Chair informed the Committee that there were some inconsistencies in Appendix 7, Proposed Open Space Allocation. Some open space allocations were missing and several small open space allocations had been included. These errors would be addressed by officers.

Marko Kalik, Head of Planning Policy and Conservation, presented the report and appendices which provided a summary of the regulation 18, part 4 consultation on the Council's low growth option and sought Member agreement on the growth option to be pursued for the regulation 19 publication version of the plan and sought Member approval for a range of non-housing allocations and agreement on the inseting of Bedmond in the Green Belt.

The Head of Planning presented the background to the Council's Local Plan and then spoke about each appendix in turn and answered questions raised.

The Chair advised the sub-committee that if any definitive guidance or information was forthcoming from Central Government, following the change of administration, a Local Plan Sub-Committee meeting may be required in September.

Jon Bishop from the Chorleywood Residents Association spoke to the sub-committee about concerns regarding the moderate growth option and that he was in support of the low growth option. It was felt that any delay would very impactful and there were objections to the inseting of Bedmond.

Appendix 1- Part 4 Consultation Report

Appendix 1 set out the consultation summary. 17,000 consultation responses had been received from 957 individual respondents. Most responses were from older people and officers would continue to try and reach younger people and hard to reach groups.

The final details of the individual sites were being considered based on consultation responses and would come to a future Local Plan Sub-Committee. 90% supported the Council's approach to growth.

The Head of Planning Policy and Conservation reminded Members that it was not a vote and that it was the content of the comments that mattered not the quantity. The inspector at examination would note support and objections but the inspector's decisions would be solely based on technical planning matters.

The Chair explained to Members that due to some of the comments that had been raised, some of the individual sites would be reviewed with potentially revised

numbers and removals. This would be brought to one of the meetings scheduled for August, when documentation for individual sites would be available.

A Member requested that there was a breakdown of support, opposition and comments based on the geography of the respondent.

Aaron Roberts, Senior Planning Officer, confirmed that there was a breakdown by postcode available.

The Head of Planning Policy and Conservation agreed to consider providing the information requested if it would not take up too much of officers' time and cause delays of the Plan.

Appendix 2 Part 4 Statutory Consultation Summaries

The Head of Planning Policy and Conservation informed Members that some of the responses were very long and if Members wanted to read the full responses on pdf, officers would share upon request.

Appendix 3 – Proposed Employment Allocations

The Head of Planning Policy and Conservation reminded officers that for the Regulation 18 Part 4 consultation, Members had agreed the low growth approach (270 dwellings per annum) for the regulation 19 draft plan whereas officer's recommendation had been for the moderate growth approach (415 dwellings per annum). The standard method target was now 640 dwellings per annum. Officers were recommending the moderate growth option again. There had been a tabled amendment for the low growth approach from the Chair.

Officers needed to caveat that it was officers' opinion, that the government's recent announcement may make some difference and increase the level of risk associated with the moderate approach.

Regarding the Duty to Co-operate, officers had been in discussion with neighbouring authorities about signing future statements of common ground, however, if their positions change due to the governments proposed change of policy then this may be a concern. TRDC does have a good history of working collaboratively with neighbouring authorities.

A Member commented that Adult Social Care Services had made a valid point in that there was an under allocation of care provision and proposed that the larger sites of Maple Cross and Shepherds Lane had extra provision of Adult Social Care Services on-site.

The Head of Planning Policy and Conservation explained that there would be input into the sites assessment work and putting forward options for extra care facilities if agreed by Members. It would have to be balanced with other infrastructure requirements.

The Head of Planning Policy and Conservation explained that there were concerns that the lower levels of growth could result in the examination being paused to enable the Council to find more sites or could be rejected. This would result in delays to the Plan which would cost the Council time and money. Members would need to weigh up delays of the Plan now and delays by the examination process. Members were already aware of the risk of speculative planning applications during these periods. The lowest risk option was meeting the standard method target in full. The officer's recommendation was the moderate growth approach which was high risk and the lower growth approach was even higher risk.

Appendix 3 - Proposed Employment Allocations

The Head of Planning Policy and Conservation informed Members that the Economic Study Update had taken longer than expected. A meeting in August had been scheduled for the final report. Early indications were that there was no further need for office development in the district. An additional office allocation for Leavesden Park was being proposed by officers as this was successfully included in the article 4 direction agreed by the Secretary of State.

In terms of industrial warehouse use, early indications were that there would be less need than was set out in the 2021 regulation 18 consultation. In the allocations, Lynsters Farm may need to be reduced to just the brownfield elements of that site and there were some Highway's objections to larger vehicles using the access there. If this could not be resolved, there may be a need for alternative locations.

The Head of Planning Policy and Conservation would clarify whether the extension to Croxley Business Park planning application was still implementable.

Appendix 4 - Warner Bros Studios Allocation

The Head of Planning Policy and Conservation explained that this remained a site of strategic importance to the district and should be safeguarded for expansion.

Appendix 5 - Proposed Town Centres and Retail Allocations

The Head of Planning Policy and Conservation explained that the article 4 directions now included the town and district centres but not the local centres.

Appendix 6 – Proposed Education Allocations

The Chair raised secondary school allocations and felt it was prudent to ask Hertfordshire County Council (HCC) to review them and provide supporting evidence in the case of the site in Oxhey Lane. Officers were also asked to go back to HCC regarding the need for a secondary school in the Abbots Langley/Kings Langley area. The Head of Planning Policy and Conservation explained that was a cross boundary strategic matter so some of the need would meet Watford's and Hertsmere's need.

Appendix 7 & 8 – Proposed Open Space Allocation

The Chair informed Members that the map did not include all open space sites and very small areas of grass had been included. The Head of Planning Policy and Conservation clarified that the map was accurately showing where the open spaces were, based on historic allocations.

The map would be reviewed, and the small sites removed. It would then come back to Committee in August. Members were invited to submit a list of potential sites to be included in the open space allocation, being mindful of the quantity submitted so that it did not cause delays to the Plan due to officer's being overloaded with work.

Matthew Bedford, resident, was invited to speak and said that he supported all the open space designations, including the two new ones on the Warner site. Matthew wanted to urge the Committee to reconsider land to the North of Abbots Langley to the motorway, specifically to the eastern end of that land. It was previously consulted on and there were no objections. It was important to protect that land as much as possible due to recreation on the site. Two other potential sites were Long Spring

Wood, Bedmond, owned by the Herts and Middlesex Wildlife Trust, and a small area of woodland at the North of Church Hill, Bedmond designated as a local nature site. Breakspear School was being relocated and the relocation of the Vine House doctors surgery to the Breakspear school site, once vacated by the school, therefore would it be appropriate to put a health allocation on it.

Members added their support to the suggestions put forward by Matthew Bedford.

The Head of Planning Policy and Conservation agreed to review the sites and discuss the potential health allocation site with HCC and would check the position on allotments and the open space allocation.

Appendix 9 – Proposed Maple Lodge Wastewater Treatment Works Allocation.

The Head of Planning Policy and Conservation informed Members of a proposed minor change; the significant infrastructure site in the Green Belt no longer existed in Planning Policy therefore it was proposed to remove the site from the Green Belt to allow for future works, to help alleviate infrastructure pressures.

Appendices 10 – 15

The Head of Planning Policy and Conservation presented the appendices and the Bedmond Green Belt inseting proposal.

Members commented and discussed various reasons why they did not agree with the inseting of the Bedmond site including recently updated NPPF and the change of emphasis regarding the Green Belt.

The Head of Planning Policy and Conservation explained that there were exceptional circumstances where the Green Belt needed to be reviewed and the inspector would expect the Council to do so to meet development needs. The inseting of Bedmond village core which was completely developed would allow the opportunity to do some small-scale development.

The Chair commented that the wording of the recommendation could be reviewed to include updating the relevant policy references, before it was submitted to the Policy and Resources Committee.

The Head of Planning Policy and Conservation and the Chair clarified that the exact area for the proposed inset was all the developed areas plus the garage and the white area inside the red square of the map. The mauve area would not become part of the inset.

A District Councillor raised concerns that sites believed to be protected by the Green Belt would, despite not being in the inset area, become more vulnerable to residential development as a result of inseting Bedmond.

The Head of Planning Policy and Conservation clarified that the area in the map that was not cross hatched, was the original Bedmond inseting. The garage would be in the inseting area, and it was agreed that the sites to the south would be added to with the 12 extra dwellings. The Council was required to meet development needs and the smaller additions to Bedmond would help. Any sites next to the inseting would still be in the Green Belt and would not be at any more risk of development as they would still be subject to Green Belt policy.

Councillor Cooper proposed to amend the recommendation to remove line 5 relating to Bedmond.

Councillor Alley seconded the proposal.

A Member wanted it noted that the stated position of the Conservative Group was to further limit itself within the Green Belt, to consider only previously developed land to be acceptable for development but would not put that to a vote.

Members discussed in detail the positives and negatives of inseting Bedmond and as no overriding reason could be identified that would be beneficial, the Chair proposed that Bedmond would remain as a “washed over” Green Belt area and moved the revised recommendations, seconded by Councillor Nelmes.

RESOLVED: Unanimously that the Local Plan Sub Committee:

- 1. Note the contents of this report and the required further work, particularly on open spaces.**
- 2. Agree the Lower Growth and Green Belt restraint option, that received over 90% public support, where only sites in areas of moderate Green Belt harm or less, as set out in the Stage 2 Green Belt Review, are considered acceptable for residential development continues to be Council’s position.**
- 3. Agree the non-housing allocations as set out in this report except for CFS 11 (Carpenders Park Farm, Oxhey Lane) where officers are to require Hertfordshire County Council, as the education authority, to substantiate their requirement for this site with evidence for a 10fe secondary Low Growth option of this authority and report back.**
- 4. That officers work further with Hertfordshire County Council over the Countys' identified need for a secondary school, but not yet a site, in the Abbots Langley/ Kings Langley area.**
- 5. Agree to site CFS10 NOT being allocated in addition to the two Bedmond sites included in the Regulation 18 Part 4 Lower Housing Growth Option.**

LPSC28/23 OTHER BUSINESS - IF APPROVED UNDER ITEM 3 ABOVE.

There was none.

CHAIR

LOCAL PLAN SUB-COMMITTEE 8 August 2024 PART I

LOCAL PLAN: Changes to Preferred Policy Options following Regulation 18 Consultation (DCES)

1 Summary

This report seeks member agreement of the updates to the draft Local Plan policies from the Draft Local Plan Regulation 18 Part 1: Preferred Policy Options document in response to changes to national planning policy, comments received to the Regulation 18 consultation and consideration at Local Plan Sub-Committee meetings in 2022 and 2023.

2 Details

- 2.1 The Regulation 18 Part 1 Preferred Policy Options was consulted on from 11 June – 20 August 2021.
- 2.2 Following this round of Regulation 18 consultation the Local Plan Sub-Committee considered updates to the draft Local Plan policies in 2022 and 2023. At these Local Plan Sub-Committee meetings, Members were informed of any changes to national policy and considered representations made on the policies through the consultation.
- 2.3 These policies have now been further updated to include Member comments from these meetings and are proposed by officers for inclusion in the Regulation 19 Publication version of the Local Plan. It should be noted that any changes are fairly minor and in essence these policies have already been agreed by Members at previous Local Plan Sub-Committees.
- 2.4 In addition to the updated policies there is one new policy to be considered by Members relating to the Chiltern Beechwoods Special Area of Conservation.
- 2.5 This report will set out some background on each policy, the draft policies can be viewed in the appendices to the report.

Chiltern Beechwoods Special Area of Conservation (SAC)

- 2.6 Dacorum Borough Council commissioned visitor surveys at the Chiltern Beechwoods SAC as part of their Local Plan preparation. The footprint Ecology Report found that the site is being heavily damaged by visitor pressure and identified concerns around the cumulative impact of residential development.
- 2.7 The report identified a 12.6km Zone of Influence (ZOI). As a result, large developments in the ZOI will be required to produce a Habitat Regulations Assessment and may be required to provide mitigation measures.
- 2.8 Although part of Three Rivers falls within the ZOI it was not included in the 'strategic solution' by Natural England as less than 2% of visitors to the SAC were from Three Rivers.
- 2.9 Natural England responded to our Regulation 18 Additional Sites for Potential Allocation consultation. A key mitigation measure they require is the provision of

Suitable Alternative Natural Greenspace (SANG). Any SANG would need to be sufficient size/quality to divert visitors away from the Chiltern Beechwoods and create a semi-natural experience. SANGs must have the following:

- Adequate parking for visitors, unless the site is intended for local use (within 400m walk of developments linked to it).
- Possible to complete a circular walk of 2.3 to 2.5km around the SANG.
- SANG must be designed so that they are perceived as safe by users; they must not have tree and scrub cover along parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid an urban feel.
- SANG must be semi-natural spaces with little intrusion of artificial structures.

2.10 The draft Chiltern Beechwoods SAC policy has been prepared in consultation with Natural England who are satisfied with the wording provided. The policy can be viewed in Appendix 1 to this report.

Northwood Headquarters MOD

2.11 National planning policy¹ requires planning policies to take into account defence requirements by recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

2.12 Following a representation to the Part 1 Regulation 18 consultation from the Defence Infrastructure Organisation (MOD) on behalf of the Secretary of State for Defence, a new policy was proposed in relation to the MOD Northwood Site which they identify as a significant defence asset where additional development is envisaged to support National Security needs.

2.13 Therefore, a new policy was proposed to meet national planning policy guidance, to support operational development of the site, to ensure that development proposals in proximity of the MOD Northwood site would not lead to the need for mitigation from MOD activities and also recognising the MOD's commitment to reduce its built estate in the future which may result in brownfield sites becoming available.

2.14 The policy was agreed by Members at the March 2022 Local Plan Sub-Committee and only minor changes have been made to make the policy read better. The policy for Northwood Headquarters (MOD) is set out in Appendix 2.

Residential Design and Layout

2.15 As well as securing an adequate supply of housing of a mix of sizes, types and tenures to meet needs in the District, to ensure the quality of life of Three Rivers' residents and communities it is essential that all housing that is provided is of high quality and that there is suitable accommodation to meet a range of needs.

2.16 The NPPF acknowledges at paragraph 128 that development should take into account the desirability of maintaining an area's prevailing character and setting

¹ NPPF Paragraph 101 b)

(including residential gardens), and at paragraph 72 that there may be a case for policies to resist inappropriate development of residential gardens for example where development would cause harm to the local area.

- 2.17 Pressure for development including on garden land or for infill development can erode the particular character of an area or impact on the residential amenity of both existing and new occupants if not managed. However, taking a different approach to the established character of an area will not necessarily be harmful in all cases where it is informed by careful consideration for important elements of local character and the quality of the area. The draft policy sets out the factors that will be considered in determining whether a proposal may result in unacceptable harm to an area.
- 2.18 In particular, proposals for tandem development (one or more dwellings directly behind one another on the same plot and sharing the same access) or backland development (one or more dwellings provided to the rear of existing buildings with no street frontage and generally accessed by a long driveway) need to be carefully considered as these can often be inappropriate.
- 2.19 The subdivision of existing dwellings can also contribute a source of new housing supply and these types of applications can be a satisfactory way of raising densities in low density areas close to local transport nodes and local services. However, whether or not subdivision is acceptable will depend on the characteristics of the building and area, and the standard of accommodation that can be created. Applications will therefore be carefully assessed to ensure that character and residential amenity are protected.
- 2.20 Delivering high quality housing requires careful consideration for the provision of usable internal space, as well as providing access to a suitable quantity and quality of external amenity space to support quality of life for residents.
- 2.21 To provide for a suitable standard of accommodation, the Government has published nationally described space standards (NDSS) which set out optional requirements for the floor area of new dwellings depending on the level of occupancy, as well as floor areas and dimensions for key parts of the home such as bedrooms, storage and floor to ceiling heights.
- 2.22 Requiring new development to generally accord with NDSS would provide for improvement to the quality of housing being delivered and resulting benefit or the general health and wellbeing of the community and a more flexible and adaptable housing stock to be able to meet the needs of residents.
- 2.23 The main change to the policy since previously being considered by Members at the Local Plan Sub-Committee is the addition of a section on tall buildings as Members had asked for this to be considered further. This section qualifies tall buildings as those with 4 storeys or above or any building substantially taller than its neighbours.
- 2.24 The additional wording on tall buildings puts an emphasis on character and design as well as impact on views.
- 2.25 It should be noted that the detailed design standards appendix is still being updated and will be reported to a future Local Plan Sub Committee. This work is not expected to affect the policy itself.
- 2.26 The Residential Design and Layout Policy is in Appendix 3 to this report.

Local Distinctiveness and Place Shaping

- 2.27 The Local Plan identifies a requirement to accommodate significant growth over the plan period including the provision of new homes and space for employment and economic development with supporting infrastructure.
- 2.28 This should not be at the cost of the quality of the environment or quality of life, or the local distinctiveness of our places. It is essential that all new development functions well for all users and will add to the overall quality of the area in both the short and long-term. Proposals should respond to the elements of a place that make it distinctive, but this does not mean that development should necessarily replicate the scale or density of the existing built form.
- 2.29 Well-designed places should be functional; support mixed uses and tenures; include successful public spaces; be adaptable and resilient; have a distinctive character; be attractive; and encourage ease of movement.
- 2.30 Alongside the requirements of other policies of the Local Plan, the draft Local Distinctiveness and Design policy identifies the key design considerations which will apply in Three Rivers to all development proposals including new development, extensions, alterations, conversions and changes of use to create quality places and spaces for our communities.
- 2.31 When considering this policy previously, Members of the Local Plan Sub-Committee raised issues around connectivity and light pollution, however these issues are covered by other Local Plan policies and have not been added here.
- 2.32 Members wished to see reference to Neighbourhood Plans and the diverse architecture of the District, and these have been added to criterion 4 in the policy.
- 2.33 The revised Local Distinctiveness and Place Shaping Policy is in Appendix 4 to this report.

Heritage and Historic Environment

- 2.34 The District's historic environment is not just important for its own sake, but contributes towards the high quality of environment in the District and is an important resource bringing social, cultural, economic and environmental benefits to the community.
- 2.35 The historic environment is a finite and non-renewable resource. Heritage assets and the historic environment should be protected from inappropriate development to sustain and where appropriate enhance their significance, including putting heritage assets into uses consistent with their conservation. The more significant the heritage asset, the greater the presumption for its conservation.
- 2.36 Within Three Rivers, heritage assets which make a positive contribution to the historic environment include
- Designated heritage assets such as Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas, and the setting of these assets;
 - Non-Designated heritage assets such as Locally Important Buildings, unregistered historic parks and gardens, and archaeology, and the setting of these assets.

2.37 The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment and the draft policy aims to protect, conserve and enhance our historic environment and the heritage assets within it.

2.38 The strategy will also:

- support proposals which conserve and enhance the historic environment
- carry out a programme of reviewing existing conservation areas and producing conservation area appraisals to identify what it is about the area that contributes to its significance as well as identifying and considering new areas for designation as conservation areas
- support proposals for heritage-led regeneration, ensuring that heritage assets are conserved, enhanced and secured for the future
- identify heritage assets that make an important contribution to the local character of the area and update our local list on a regular basis
- identify buildings that could be included on the national list and preparing reports to support new listings
- identify buildings that are falling into disrepair and work with owners to find new uses to ensure their continued beneficial use.

2.39 Some minor changes to wording have been made for clarification purposes including adding the word 'public' when referencing views in and out of the conservation area as requested by Members. Throughout the policy and reasoned justification the word conserve has been replaced with preserve to bring it in line with The Town and Country Planning Act (1990). In paragraph 5 "applications for development which could impact upon a designated heritage asset" has been added to more clearly specify that only sites impacting on a heritage asset would need to submit a heritage statement, not all development.

2.40 The revised Heritage and Historic Environment Policy is in Appendix 5 to this report.

Social and Community Uses

2.41 Paragraph 97 of the NPPF confirms that to provide the social, recreational and cultural facilities and services that the community needs, policies should plan positively for the provision and use of shared spaces, community facilities, and other local services to enhance the sustainability of communities and residential environments. Policies should also take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; and ensure an integrated approach to consider the location of housing, economic uses and community facilities and services.

2.42 Social and community facilities and important local services may include (but are not limited to) local shops, post offices, health services such as doctors or dental surgeries, schools and nurseries, libraries, places of worship, community centres or village halls, meeting places, sports venues, open space, play space, cultural buildings, facilities for arts, theatres, and public houses.

- 2.43 The Open Space, Sport and Recreation Study identified that several community venues, such as village halls, schools, community centres and scout huts are used for sport and leisure provision and recommends that these should be protected.
- 2.44 Outside of urban areas, facilities such as public houses, post offices and petrol stations in particular can perform a vital function in terms of the economic and social welfare of such areas and to help ensure the continued vitality of village and rural communities.
- 2.45 As social and community facilities, whether publicly or privately owned, can be subject to development pressures from alternative uses it is recommended that the new Local Plan contains a policy that will protect the existing services and facilities and ensure that new development supports the necessary enhancements to, or provision of new facilities.
- 2.46 The proposed Draft Social and Community Facilities Policy is set out Appendix 6 to this report.

Flood Risk and Water Resources

Flooding and SuDs

- 2.47 The National Planning Policy Framework requires that strategic flood risk policies are informed by a Strategic Flood Risk Assessment (SFRA) and states that strategic flood risk policies should manage flood risk from all sources.
- 2.48 The Council has completed both a Level 1 and Level 2 SFRA .
- 2.49 The Level 1 SFRA is a strategic level study² which collates and analyses the latest available information and data for current and future (i.e. climate change) flood risk from all sources³ and how these can be mitigated
- 2.50 The Level 2 SFRA provides an assessment of:
- all sources of flooding including fluvial flooding, surface water flooding, groundwater flooding, reservoir flooding, mapping of the functional floodplain and the potential increase in fluvial and surface water flood risk due to climate change.
 - any flood warning areas at sites, including whether there is safe access and egress during an extreme event, and
 - Advice and recommendations on the likely suitability of Sustainable Drainage Systems (SuDS) for managing surface water runoff.
- 2.51 SuDS are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. They provide opportunities to reduce the causes and impacts of flooding and combine water management with green space and amenity, recreation and wildlife benefits.

² A joint study with Dacorum Borough Council, St. Albans City and District Council and Watford Borough Council.

³ The SFRA has considered all sources of flooding including fluvial, surface water, ground water, sewers and reservoirs.

- 2.52 The NPPF states that all major developments should incorporate SuDS unless there is clear evidence that this would be inappropriate. The systems should:
- a) take account of advice from the lead local flood authority;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.
- 2.53 The Level 1 SFRA recommended that planning policies should focus on supporting the Lead Local Flood Authority (Hertfordshire County Council) in ensuring that all developments, even minor ones, build SuDS into their design. As the effectiveness of SuDS within a site is dependent on the site characteristics such as topography, geology, soil permeability and existing flow paths across the site, the techniques used should be appropriate to local conditions.

Water Resources

- 2.54 The Three Rivers District is entirely underlain by a chalk aquifer, which is the main drinking water resource for the area and a regionally important source of groundwater. The Three Rivers area has a large number of surface water resources including the Rivers Colne, Gade and Chess, the Grand Union Canal, as well as several lakes and ponds, particularly within the floodplain of the River Colne.
- 2.55 The NPPF goes on to state that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. Development should, wherever possible, help to improve local environmental conditions such as water quality, taking into account relevant information such as river basin management plans (paragraph 180).
- 2.56 It is essential for development to protect and, where possible, enhance water quality. This means controlling aquatic pollution, protecting and enhancing the quality and quantity of groundwater, protecting and enhancing surface water resources, such as through the use of SuDS to manage surface water. Changes to the design of developments and the implementation of mitigation measures should prevent potential harm to water bodies, however, where it is likely that a proposal would have a significant adverse impact on water quality, a more detailed assessment will be required.
- 2.57 Paragraph 158 of the NPPF states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- 2.58 Three Rivers is located in an area of serious water stress⁴. Until recently, the District's water supply region had one of the highest water usage rates yet is located in one of

⁴ The Environment Agency (2013) Water stressed areas – final classification https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf. 'Serious' water stress is identified as an area where the current or future demand for household water is, or is likely to be, a high proportion of the effective rainfall which is available to meet that demand.

the driest regions, with Hertfordshire's average rainfall returning only two thirds the national average⁵. Climate change is predicted to bring warmer wetter winters and hotter drier summers, reducing the overall available supply of water and increasing the demand for water. Prolonged periods of hotter weather is anticipated to lead to more evaporation from reservoirs and rivers and potential drought events whilst intense rainfall would result in surface flooding and more pollutants running off into rivers and streams.

- 2.59 This highlights the importance of protecting the quality of water resources as well as encouraging the use of water efficiency measures and a reduction in water consumption, in order to protect future water supply. In individual developments, the design of dwellings and buildings can incorporate water efficient features such as rainwater storage tanks, water butts and green roofs (as appropriate). The efficient use of water resources, including water re-use and recycling, should also be sought through sustainable construction methods (such as rainwater harvesting) that conserve and make prudent use of water and other natural resources. Water efficient appliances (for showers, taps, washing machines, toilets, etc.) and water efficient landscaping and irrigating measures in new developments will also help to support sustainable supplies of water for the future.
- 2.60 Part G of the Building Regulations sets a mandatory requirement that all new homes must achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015, the Building Regulations Part G were updated and an 'optional' requirement of 110 l/p/d for new residential development was introduced⁶. Where there is a clear need, Local Plan policies can require that new dwellings meet optional requirement of 110 l/p/d⁷.
- 2.61 Given the estimated future regional shortfall in water supply, the recommendation from the Environment Agency in the Thames River Basin Management Plan and in consultation with Affinity Water, it is considered that there is an evidenced need to require the optional standard of 110 l/p/d in new developments in order to ensure water efficiency. Three Rivers' classification in an area of serious water stress further evidences a need for the optional 110 l/p/d requirement.
- 2.62 The policy was discussed at the March 2022 Local Plan Sub-Committee and relevant comments have been incorporated including 'the minimum optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day'. Minor changes made for clarity and as per DM comments. For example, reference to 'Environment Agency' added in relation to their classification of 'less vulnerable uses' in Policy 1(c). New phrases 'from any source' and 'as necessary' are added to Policy 1(a) for clarity.
- 2.63 The proposed Flood Risk and Water Resources Policy is set out Appendix 7 to this report.

Ground Conditions, Contamination and Pollution

⁵ Building Futures Water Facts <https://www.hertfordshire.gov.uk/microsites/building-futures/a-sustainable-design-toolkit/technical-modules/water/water-facts.aspx>

⁶ It should be noted that in July-October 2019, the Government consulted on lowering the mandatory standard of 125 l/p/d and optional requirement of 110 l/p/d as a measure to reduce personal water use (<https://consult.defra.gov.uk/water/measures-to-reduce-personal-water-use/>).

⁷ NPPG, Housing: optional technical standards, Paragraph: 014

- 2.64 The planning system has an important role to play in protecting the environment, biodiversity, local residents, businesses and the public in general from all forms of development that could give rise to pollution. Pollution can be in many forms and includes all solid, liquid and gaseous emissions⁸ to air, land and water (including groundwater) from all types of development.
- 2.65 Although pollution control regimes are governed by legislation outside of the planning process, the NPPF emphasises that planning policies and decisions should contribute to and enhance the natural environment which includes consideration for land stability, contamination and pollution.⁹
- 2.66 Paragraph 194 of the NPPF makes it clear that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions where these are subject to separate pollution control regimes. Planning decisions should assume that these regimes will operate effectively.
- 2.67 With regards to land stability and contamination, national planning policy states that planning policies (and decisions) should only be concerned as to whether a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination and any proposals for mitigation¹⁰.
- 2.68 The legal definition of 'contaminated land' is set out in Part 2A of the Environmental Protection Act 1990:
- 'Any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that significant harm is being caused or there is a significant possibility of such harm being caused; or significant pollution of controlled waters is being, or is likely to be caused.'
- 2.69 The Local Plan should therefore contain a policy that ensures that any unstable land is appropriately remediated and any contaminated¹¹ land is allocated only for appropriate development.
- 2.70 Air pollutants (including dust and odour) have been shown to have an adverse effect on both health and the environment and the 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂).
- 2.71 To ensure that objectives can continue to be met in future and to secure improvements in air quality, emissions arising from any development including indirect emissions, such as those attributable to associated traffic generation, must be considered in determining planning applications. Developments sensitive to air

⁸ Emissions include noise, light, vibration, smell, smoke and fumes, soot, ash, dust or grit which has a damaging effect on the environment and the public's enjoyment, health or amenity

⁹ Measures to protect and enhance water quality will be covered in a separate policy.

¹⁰ Paragraph 189 of NPPF states that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

¹¹ It is important to note that land that does not fit this legal definition of 'contaminated land' may still be affected by contamination.

pollutants should also be located where future occupiers would not be subject to unacceptable levels of air pollutants from existing sources.

- 2.72 In considering noise and vibration impacts, it is important to ensure noise-sensitive developments are located away from existing sources of significant noise and that potentially noisy developments are located in areas where noise or vibrations will not give rise to adverse impacts on surrounding occupiers or the environment, or where impacts can be minimised and mitigated.
- 2.73 Equally, insensitive lighting (light pollution) can have a negative effect on the amenity of surrounding areas and have a negative impact on biodiversity by influencing plant and animal activity patterns. In particular, light pollution can be harmful to birds, bats, and other nocturnal species that avoid overly lit areas.
- 2.74 Wording of the policy has been changed from 'Soil' to 'Ground' to remove confusion. Clarification that mitigation measures must accompany a planning application has been added. The section on light pollution has been updated to include guidance from the Institute of Lighting Professionals and that hours of illumination should be controlled as suggested by Members.
- 2.75 Updated Reasoned Justification now includes details of Ground Conditions, Air Quality (including updated statistics), Noise and Vibration and Lighting. Additional detail on noise fencing has also been added.
- 2.76 The proposed Ground Conditions, Contamination and Pollution Policy is set out Appendix 8 to this report.

Waste Management and Recycling

- 2.77 The most effective environmental solution is often to reduce the generation of waste, including the re-use of products (prevention). Products that have become waste can be checked, cleaned or repaired so that they can be re-used (preparing for re-use). Waste materials can be reprocessed into products, materials or substances – (recycling). Waste can serve a useful purpose by replacing other materials that would otherwise have been used (other recovery). The least desirable solution where none of the above options is appropriate is disposal.
- 2.78 Whilst the responsibility for dealing with waste (and minerals) in Three Rivers lies principally with Hertfordshire County Council, the District Council can help promote kerbside collection and community recycling through planning policy.
- 2.79 A key part of this is ensuring that residents and businesses have sufficiently convenient facilities and storage to maximise re-use and recycling, and that this provision is integrated through the design and layout of development without adverse impact on the street scene or, in less developed areas, the local landscape.
- 2.80 The Council is preparing guidance to be used by developers and landowners to design waste management facilities for new and refurbished development called 'Solid Waste Storage/Collection Guidance'. The draft policy refers developers to this guidance.
- 2.81 The policy refers to Modern Methods of Construction (MMC) and integrating a circular economy statement into the Waste Management Plan as a means to achieve a raft of benefits including reduced carbon emissions, higher levels of sustainability, less

construction waste and lower total development cost, due to lower whole life costs and lower costs in use. Hertfordshire County Council are actively encouraging the use of MMC through Herts IQ, the County's Enterprise Zone with its innovation partner BRE.

- 2.82 The Draft Waste and Recycling Policy in Appendix 9 seeks to reduce, re-use and recycle waste as part of the construction process and for the design of development to facilitate waste recycling.
- 2.83 Changes have been made to this policy in terms of wording added to the adverse impact on the surrounding areas, specifying new development proposals, and specifying that only major applications will require a waste management plan and a circular economy statement. The exploration for opportunistic extraction of minerals for new developments has also been added at the request of Hertfordshire County Council Minerals and Waste.

Landscape Character

- 2.84 The landscape of Three Rivers is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other landforms. Wildlife habitats such as meadows, woodlands, hedgerows, orchards and wetlands are valued components of the landscape and have their own special management requirements.
- 2.85 The NPPF states that strategic policies in a Local Plan should:
- Make sufficient provision for the conservation and enhancement of the natural, built and historic environment including landscapes and green infrastructure¹².
 - Ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)¹³.
 - Contribute to and enhance the natural local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)¹⁴.
 - Give great weight to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues and the scale and extent of development within these designated areas should be limited.¹⁵
- 2.86 Three Rivers incorporates 546 hectares of the Chilterns National Landscape consisting largely of chalk stream, river, valley and adjacent hillsides and woods. As there will be increasing pressure for development across the District, it is important that all landscape, including the Chilterns National Landscape, is conserved and

¹² NPPF Paragraph 20 d)

¹³ NPPF Paragraph 135 c)

¹⁴ NPPF Paragraph 180 a)

¹⁵ NPPF Paragraph 182

enhanced. The policy ensures that the design of development proposals is sensitive enough to ensure that schemes make a positive contribution to the landscape. National Landscapes are designated for the purpose of conserving and enhancing the natural beauty of the area, which includes its flora, fauna, and geological and natural physical features.

- 2.87 The NPPF makes it clear that AONB designations (now known as National Landscapes) provide a strong reason to restrict the overall scale/type/distribution of development and the Council has a duty to conserve and enhance its natural beauty¹⁶.
- 2.88 Hertfordshire County Council's Landscape Character Assessment identifies three landscape regions in Three Rivers:
- The Chilterns Landscape Region (including parts of the Chilterns National Landscape)
 - The Central River Valleys Landscape Region
 - The South Hertfordshire Plateau
- 2.89 These landscape regions contain a variety of landscape character areas for which assessments have been produced identifying key characteristics and influences.
- 2.90 The Council should seek to ensure that development complements the surrounding local landscape of Three Rivers as identified in the current Local Character Assessments, through siting, layout, design, appearance and landscaping of development. The draft policy encourages applicants to refer to the Landscape Character Assessments for information in relation to these matters.
- 2.91 Minor changes have been made to the policy primarily to align with the government's decision to rebrand the Area of Outstanding Natural Beauty as National Landscape from 22 November 2023. A new paragraph has been added in reasoned justification to explain this, as many people may not be fully aware. However, since 'AONB' remains the legal name for the designation, this term is also used in appropriate places, for example, when referring to older documents such as the Chilterns AONB Management Plan.
- 2.92 The proposed Landscape Character Policy is set out Appendix 10 to this report.

Advertisements

- 2.93 The term 'advertisement' covers a wide range of advertisements and signs including hoardings, illuminations of hoardings, illuminated fascia signs, free-standing display panels, and estate agent boards.
- 2.94 Not all advertisements are regulated by the Council and others benefit from deemed consent, which means that permission is not needed: this will depend on the size, position and illumination of the advert.
- 2.95 Paragraph 141 of the NPPF confirms that the quality and character of places can suffer when advertisements are poorly sited and designed and so, where consent is

¹⁶ NPPF Paragraph 11 d) i.

required, the Council can have regard to considerations of amenity and public safety, taking account of cumulative impacts.

- 2.96 The proposed Advertisements Policy (Appendix 11) identifies specific criteria which will be taken into account when considering amenity and public safety of advertisements in Three Rivers to ensure that the quality and character of the District and places is not adversely affected.
- 2.97 Minor changes to clarify wording have been made following suggestions from Development Management Officers. Members had discussed illuminations at a previous Local Plan Sub-Committee meeting, particularly with regard to sustainability (i.e. advertisements being illuminated 24/7). While the policy does not make explicit reference to the length of time for which advertisements should be illuminated, it is stated that new advertisements must be sited to prevent visual intrusion by virtue of light pollution into adjoining sensitive land uses, including residential properties and wildlife habitat, and respect local context. Officers considers this wording satisfactory, and it has therefore not been changed.

Deliveries, Servicing and Construction

- 2.98 The arrangements for deliveries and servicing and for the management of construction can have a significant impact on the environment, both on a development site and in the surrounding area and must be considered as an important part of proposals for new development.
- 2.99 The proposed Deliveries, Servicing and Construction Policy (Appendix 12) aims to ensure that development proposals provide adequate space and access within a site to accommodate requirements for storage and collection of waste and deliveries as well as managing associated vehicle movements so that these do not result in harm to the amenity of the area or any neighbouring occupiers, and ensure safe access and egress for emergency vehicles.
- 2.100 This policy remains the same as agreed by Members at previous Local Plan Sub-Committee.

- **Policy/Budget Reference and Implications**

The recommendations in this report are within the Council's agreed policy and budgets.

Financial, Legal, Equal Opportunities, Staffing, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications

None specific.

- **Recommendation**

That the Local Plan Sub-Committee note the contents of this report, and recommend to the Policy & Resources Committee the following policy updates:

- Chilterns Beechwoods SAC Policy (Appendix 1)
- Northwood Headquarters MOD Policy (Appendix 2)

- Residential Design and Layout Policy (Appendix 3)
 - Local Distinctiveness and Place Shaping Policy (Appendix 4)
 - Heritage and Historic Environment Policy (Appendix 5)
 - Social and Community Uses Policy (Appendix 6)
 - Flood Risk and Water Resources Policy (Appendix 7)
 - Ground Conditions, Contamination and Pollution Policy (Appendix 8)
 - Waste Management and Recycling Policy (Appendix 9)
 - Landscape Character Policy (Appendix 10)
 - Advertisements Policy (Appendix 11)
 - Deliveries, Servicing and Construction Policy (Appendix 12)
- **Background Papers**
 - National Planning Policy Framework (2023)
 - Planning Practice Guidance (2023)
 - Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)
 - Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

APPENDICES

- Appendix 1 Chilterns Beechwoods SAC Policy
- Appendix 2 Northwood Headquarters MOD Policy
- Appendix 3 Residential Design and Layout Policy
- Appendix 4 Local Distinctiveness and Place Shaping Policy
- Appendix 5 Heritage and Historic Environment Policy
- Appendix 6 Social and Community Uses Policy
- Appendix 7 Flood Risk and Water Resources Policy
- Appendix 8 Ground Conditions, Contamination and Pollution Policy
- Appendix 9 Waste Management and Recycling Policy
- Appendix 10 Landscape Character Policy
- Appendix 11 Advertisements Policy
- Appendix 12 Deliveries, Servicing and Construction Policy

Appendix 1 - Chiltern Beechwoods Special Area of Conservation (SAC)

Chiltern Beechwoods Special Area of Conservation (SAC)

- 1) Development proposals which are likely to have a significant effect on the Chiltern Beechwoods Special Area of Conservation (SAC) will be subject to a Habitats Regulations Assessment (HRA). This includes:
 - a) where proposals are within the zone of influence of Chiltern Beechwoods Special Area of Conservation (SAC) and;
 - b) where proposals result in a net increase of 100 units or more
- 2) Where development proposals are subject to a HRA they will be required to deliver suitable mitigation and / or avoidance measures in order to address potential adverse effects arising from increased recreational disturbance. This includes provision, improvement and / or maintenance of Suitable Alternative Natural Greenspace (SANG) (or a suitable financial contribution towards the same).

Reasoned Justification

1.1 The Chiltern Beechwoods Special Area of Conservation includes 9 separate sites in the Chiltern Hills and spreads across 3 counties. The Special Area of Conservation is an internationally recognised designation with habitats and species of significant ecological importance.

1.2 As part of its emerging local plan, Dacorum Borough Council has found evidence of visitor pressure in Chiltern Beechwoods Special Area of Conservation as a result of additional residential development from within the zone of influence. The report identified a 12.6km Zone of Influence (ZOI). As a result, large developments in the ZOI will be required to produce a Habitat Regulations Assessment and may be required to provide mitigation measures.

1.3 A small part of Three Rivers falls within the ZOI. It was not included in the 'strategic solution' by Natural England as less than 2% of visitors to the SAC were from Three Rivers. However, the requirement to produce a Habitat Regulations Assessment applies to sites within the ZOI. The Council has set a threshold of 100 dwellings or more on the advice of Natural England.

1.4 As part of the Habitat Regulations Assessment, development proposals will be expected to deliver suitable mitigation and / or avoidance measures to address any adverse impact on the SAC. Mitigation measures include the provision of Suitable Alternative Natural Greenspace (SANG) of sufficient size/quality to divert visitors away from the Chiltern Beechwoods SAC and leading to a creation of a semi-natural experience. Any mitigation measures should take into account information in the most recent Mitigation Strategy. SANGs must also consist of adequate parking for visitors, unless the site is intended for local use (within 400m walk of developments linked to it); aim to enable completion of a

circular walk of 2.3 to 2.5km around the SANG; are designed to enhance safety perceptions by users; are free from tree and scrub cover along parts of the walking routes and must incorporate a semi-natural feel with little intrusion of artificial structures.

Appendix 2 - Northwood Headquarters (MOD)

Northwood Headquarters (MOD)

Northwood Headquarters (MOD)

- 1) New development at Northwood Headquarters that helps to enhance or sustain its operational capability will be supported.
- 2) Redevelopment, conversion and change of use of redundant MOD sites and buildings will be supported.
- 3) 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, unless it can be demonstrated that there is no longer a defence or military need for the site.

Reasoned Justification

2.1 National planning policy requires planning policies to take into account defence requirements by recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

2.2 Northwood Headquarters is the UK's principal military HQ site for 2,000 personnel. It is home to 5 Operational HQs and HMS Wildfire which is a reserve unit of the Royal Navy. It is identified as a significant defence asset where additional development is envisaged to support National Security needs.

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Appendix 3 - Residential Design and Layout

3.1 As well as securing an adequate supply of housing of a mix of sizes, types and tenures to meet needs in the District, to ensure the quality of life of Three Rivers' residents and communities it is essential that all housing, including residential extensions are of high quality and that there is suitable accommodation to meet a range of needs.

3.2 Achieving this requires new development to be designed in accordance with the objectives and full range of policies of the new Local Plan, as well as specific design principles for new homes set out in the following preferred policy.

Residential Design and Layout

- 1) All applications for residential development, including new dwellings, replacement dwellings, and extensions or alterations to existing dwellings should satisfy the preferred Design Criteria as set out in Appendix X to ensure that development does not lead to a gradual deterioration in the quality of the built environment, and that landscaping, the need for privacy and amenity space and the creation of identity in housing layouts are taken into account.

New Residential Development

- 2) All new development should be designed and built to a high quality for the duration of its lifetime and should comply with the National Design Guide. This includes C3 and C4 Use Class developments, conversions and changes of use where planning permission is required.
- 3) New residential development should make the most efficient use of land, which may include conversion or change of use of existing buildings, new development and taking opportunities to use airspace above existing buildings where this would be consistent with policies of the Local Plan and would not compromise the quality of the environment and existing residential areas.
- 4) The Council will protect the character and residential amenity of existing areas of housing from forms of backland, infill or other forms of new residential development which are inappropriate for the area.
- 5) Development will be supported where it can be demonstrated that the proposal will not result in harm to the character or amenities of an area including through:
 - a) Tandem development;
 - b) Servicing by an awkward access drive which cannot easily be used by service vehicles;

- c) Unsafe or unsuitable access arrangements;
 - d) The generation of excessive levels of traffic;
 - e) Loss of residential amenity; or
 - f) Layouts detrimental to the particular character of an area in terms of plot size, plot depth, building footprint, plot frontage width, frontage building line, height, gaps between buildings and streetscape features (e.g. hedges, walls, grass verges etc.).
- 6) The individual and cumulative effect of applications for development on the character of an area will be taken into account and piecemeal development will be resisted in favour of comprehensive proposals that properly address design requirements.
- 7) Major development will be required to provide a masterplan and should follow the principles of design and master-planning in accordance with the National Design Guide and National Model Design Codes.

Tall Buildings

- 8) The Council will support proposals for tall buildings (buildings 4 storeys or above or any building substantially taller than its neighbours) where:
- a) The location is sustainable and suitable for high density development;
 - b) The height is proportionate to the proposed location and size of site;
 - c) They will not have a negative impact on the general amenity of surrounding businesses and spaces;
 - d) They reinforce or add positively to the surrounding scale and urban form of the area;
 - e) Consideration is given to how the building will affect important views to and from key areas of the District;
 - f) The building is of an exemplary architectural design and residential quality, maximising energy efficiency prioritising the use of sustainable materials and construction methods;
 - g) They provide appropriate levels of usable amenity space for future occupants;
 - h) They include sufficient parking for cars and cycles, in accordance with the Council's parking standards.

Subdivision of Dwellings

- 9) Subject to other development plan policies, proposals for the conversion of single dwellings into two or more units will generally be acceptable where:
- a) The building is suitable for conversion by reason of its size, shape and number of rooms. Normally, only dwellings with three or more bedrooms will be considered suitable for conversion;
 - b) The dwellings created are completely self-contained, with separate front doors either giving direct access to the dwelling, or a secure communal lobby or stairwell which itself has a secure entrance;
 - c) Adequate car parking, services and amenity space can be provided for each new unit in compliance with the Council's standards;
 - d) The character of the area and the residential amenity of immediate neighbours are protected; and
 - e) If conversion of semi-detached dwellings is proposed, generally this takes place in pairs in order that privacy and the amenities of the occupants of the adjoining dwelling are maintained.

Internal Space Standards

- 10) All residential development should meet or exceed the Technical Housing Standards as set out by the Department for Communities and Local Government (DCLG). Appropriate consideration should also be given to:
- a) Providing sufficient space for the general and specific storage needs of residents (including those with disabilities);
 - b) Floor layouts which provide for practical usable space and a good standard of amenity; and
 - c) The provision of rooms which are designed to function comfortably and efficiently for their intended purpose.

Amenity Standards

- 11) All development should meet the standards for the quantity and quality of amenity space as set out in Appendix X, unless a different approach is robustly justified (for example town centre development and development in close proximity to public open space).

Reasoned Justification

3.3 To deliver the step-change in housing required to meet needs in the area the preferred policy confirms that new development should make the most efficient use of land without compromising the quality of the environment and residential areas in line with the NPPF requirement that policies optimise use of land and seek a significant uplift in density in city and town centres and areas well served by public transport unless there are strong reasons why this would be inappropriate.

3.4 While there is a need to increase the density of development generally and encourage innovation in the delivery of new housing, it is also essential that new housing provided is of high quality and that the quality of the environment and existing residential areas is maintained or enhanced. The NPPF also acknowledges at paragraph 128(d) that development should take into account the desirability of maintaining an area's prevailing character and setting (including residential gardens), and at paragraph 72 that there may be a case for policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

3.5 Pressure for development including on garden land or for infill development can erode the particular character of an area or impact on the residential amenity of both existing and new occupants if not managed. However, taking a different approach to the established character of an area will not necessarily be harmful in all cases where it is informed by careful consideration for important elements of local character and the quality of the area.

3.6 In particular, proposals for tandem development (one or more dwellings directly behind one another on the same plot and sharing the same access) or backland development (one or more dwellings provided to the rear of existing buildings with no street frontage and generally accessed by a long driveway) need to be carefully considered as these can often be inappropriate.

3.7 The subdivision of existing dwellings can also contribute a source of new housing supply and these types of applications can be a satisfactory way of raising densities in low density areas close to local transport nodes and local services. Whether or not subdivision is acceptable will depend on the characteristics of the building and area, and the standard of accommodation that can be created.

Internal Space Standards

3.8 Delivering high quality housing requires careful consideration for the provision of usable internal space, as well as providing access to a suitable quantity and quality of external amenity space to support quality of life for residents.

3.9 To provide for a suitable standard of accommodation, the Government has published nationally described space standards (NDSS) which set out optional requirements for the floor area of new dwellings depending on the level of occupancy, as well as floor areas and dimensions for key parts of the home such as bedrooms, storage and floor to ceiling heights.

3.10 The NPPF sets out that Local Plans may make use of these NDSS where the need for an internal space standard can be justified. Monitoring information shows that 193 dwellings (25%) permitted in Three Rivers between April 2015 and March 2019 were smaller than the NDSS. This is a significant proportion and suggests that there is a clear need to apply the NDSS to new housing development in Three Rivers.

3.11 As such, requiring new development to generally accord with NDSS would provide for improvement to the quality of housing being delivered and resulting benefits for the general health and wellbeing of the community and a more flexible and adaptable housing stock better able to meet the needs of residents.

Tall Buildings

3.12 A tall building is defined as being 4 storeys or above or any building substantially taller than its neighbours.

3.13 In considering proposals for the erection of tall buildings, the following criteria will be taken into account:

- The character of the area;
- The relationship between an individual site and adjoining land and buildings;
- The context within which the proposal will sit;
- The design of the building; and
- The impact on long range views.

3.14 When considering tall buildings, an assessment of the appropriateness of the location will be made. Consideration will be given to whether the proposal will enhance the character of the area. The inter-relationship with existing buildings will also be an important factor in the assessment of the appropriateness of the location and proposal. Designs which are inappropriate in their context, or which fail to make good use of the opportunities for improving the character and quality of an area will be refused.

Amenity Space Standards

3.15 Similarly, ensuring that residents have access to a suitable quantity and quality of private or semi-private amenity space is important to provide for a good quality of life and the standards at Appendix X should be applied with consideration for the shape and utility of space provided to ensure that spaces offer good amenity.

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Appendix 4 - Local Distinctiveness and Place Shaping

4.1 It is important that all new development, including extensions and alterations to existing buildings and spaces, is designed to respect the existing character of the District and create great places for the community.

4.2 The relationship between buildings, spaces and landscape as well as detailed design and materials are all relevant factors. Good design positively influences how people move around settlements, how people interact and how places make people feel.

4.3 The Council places a high value on the importance of good design in the built environment and making places better for people. The quality of development and the ability to create well-designed places is central to how the area will function in future and the quality of the environment.

Local Distinctiveness and Place Shaping	
1)	All new development is required to achieve high quality design that contributes to enhancing local distinctiveness (including landscape and townscape character) of the area and help shape a place to create a strong sense of place. Essential elements of place shaping include creating economically and socially successful new places with a distinctive identity that promotes wellbeing.
2)	Development should satisfy relevant Design Criteria at Appendix X.
3)	Innovative designs will be encouraged where appropriate. Development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions will be refused.
Distinct Local Character	
4)	All new development should be designed to respond to locally distinct patterns of development and character, including landscape setting and the historic environment. Proposals will need to take account of local design guidance including that contained within Conservation Area Appraisals, Neighbourhood Plan character areas, where available and Supplementary Planning Documents to preserve or enhance the character, amenities and quality of an area. Large new developments should reflect the diversity of architecture in the area.
5)	Development should make efficient use of land whilst respecting the distinctiveness of the surrounding area in terms of density, character, layout and spacing, the pattern of street blocks and plots, building forms, amenity, scale, height, massing, style, landscaping and the use of materials.

- 6) The layout of proposals must be easy to navigate, with buildings designed and positioned to define and enhance a hierarchy of streets and spaces and create a density appropriate to the site, taking account of factors such as the relationship between building height and street width, and the relationship between the height, width and depth of buildings.
- 7) Materials should be sustainable, practical, durable and attractive with regard to aspects including their colour, texture, grain and reflectivity.
- 8) The size, function or density of some of the allocations for development within the Local Plan are such that it may not be appropriate for these sites to always reflect locally distinct patterns of development. In such cases, sites should take opportunities to create their own identity while ensuring cohesive and vibrant neighbourhoods.

Connections

- 9) 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.
- 10) Buildings and open spaces should be designed to create a high quality public realm, promote positive social interaction and create attractive environments that maximise opportunities and encourage people to move around by cycling and walking.

Safeguarding Amenity

- 11) Development should protect the amenities and the attractiveness of the living environment for both existing and future occupiers by taking into account the need for adequate levels and disposition of privacy, prospect, amenity and garden space, and suitable access.

Landscaping and Public Realm

- 12) Development should incorporate visually attractive frontages to adjoining streets and public spaces and should provide for high standards of building materials, finishes and landscaping.

- 13) A landscape led approach must be considered as an integral element of the layout and design of development, including integration with adjoining networks of green infrastructure, open space, surface water management systems and recreation and wildlife movement networks where appropriate and retaining, enhancing or improving important existing natural features such as trees, hedgerows and walls as far as possible.
- 14) Proposals for landscaping should show how the design, planting species and materials have been selected with regard to factors including the character of the area, conservation and enhancement of biodiversity and the natural environment, and ongoing management and maintenance.
- 15) All proposals must provide landscape schemes, hard and soft landscape specifications, planting schedules and plans and management and maintenance plans for a minimum of five years during the aftercare period.
- 16) Development should provide for a clear distinction between public and private space and should provide boundary treatments which enhance the appearance, character and amenity of the site and area, whilst ensuring wildlife is able to move freely across boundaries.
- 17) Development should enhance the public realm to promote social interaction, including making provision for adequate lighting and for street furniture and public art where appropriate and ensuring that all appropriate frontages contain windows and doors that assist informal surveillance.

Safeguarding Assets and the Environment

- 18) All development should conserve and enhance natural, built, cultural and heritage assets, including public open space.
- 19) Proposals must take opportunities to make sustainable design integral to the development and build resilience into a site's design taking into account climate change including through flood resistant design, Green Infrastructure, sustainable drainage, minimising the use of natural resources, reducing waste and ensuring that buildings and spaces are capable of adaptation to other uses and functions where practical in order to ensure their long-life.

Safety and Security

20) Development must design out opportunities for crime and anti-social behaviour through the incorporation of appropriate measures to minimise the risk of crime and create safe and attractive places taking into account the Police ‘Secured by Design’ standards and where appropriate guidance on terrorism in the Government’s Planning Practice Guidance.

21) Development should provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear consideration for the interrelationship of land use with external spaces and landscaping.

Access and Inclusion

22) Places, spaces and buildings must be accessible to all potential users, including those with mobility difficulties taking into account the setting of buildings in the wider environment, the location of buildings within plots, gradient, transport infrastructure and public realm.

23) Development must provide appropriate levels of parking for cycles to support sustainable travel choices and appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. Parking and cycle storage areas should be convenient, safe and visually attractive areas that do not dominate the development or its surroundings or impact on driver, cyclist or pedestrian sight lines.

Ancillary Facilities

24) Development must provide appropriate facilities for individual and communal use including cycle storage, amenity areas and facilities for the storage and collection of refuse and recycling materials which are designed and sited in accordance with current Council standards, avoiding adverse impacts on safety or security, the street scene, or the amenities of the proposed and existing properties.

Reasoned Justification

4.4 The NPPF states that creating high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, it creates better places in which to live and work and helps make development acceptable to communities. Urban design and architecture can contribute to

health outcomes through the encouragement of more active lifestyles and development should be encouraged to create places that support mixed communities catering for the needs of different types of people including the young and old, encourage walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Building exteriors and public realm should be designed in a way that contributes to pedestrian-friendly environments.

4.5 The Local Plan identifies a requirement to accommodate significant growth over the plan period including the provision of new homes and space for employment and economic development with supporting infrastructure.

4.6 Meeting these requirements in a sustainable way will require all proposals to take opportunities to make the most efficient use of land, and in particular there is a need to secure a general uplift in the density of development in town centres and other locations which are well served by public transport.

4.7 However, this should not be at the cost of the quality of the environment or quality of life, or the local distinctiveness of our places. It is essential that new development functions well for all users and will add to the overall quality of the area in both the short- and long-term. Proposals should respond to the elements of a place that make it distinctive, but this does not mean that development should necessarily replicate the scale or density of existing built form.

4.8 Since no two places are identical, there is no blueprint for good design and each proposal will need to show how the design responds to a thorough understanding of place and context.

4.9 Development of larger sites through allocations within the Plan also offers an opportunity for these sites to create their own identity and character, although it remains vital that these developments are integrated with the surrounding area and community.

4.10 In all situations, well-designed places should be functional; support mixed uses and tenures; include successful public spaces; be adaptable and resilient; have a distinctive character; be attractive; and encourage ease of movement.

4.11 Alongside the requirements of other policies of the Local Plan, Policy D1 identifies the key design considerations which will apply in Three Rivers to all development proposals including new development, extensions, alterations, conversions and changes of use to create quality places and spaces for our communities.

4.12 Further specific requirements which apply to certain forms of development or sites are set out within other preferred policies in this document. Regard will also be had to well-established good design principles as set out in national initiatives such as the 'Building for Life' standard, 'Secured by Design' and 'Manual for Streets', and further guidance will be provided through Supplementary Planning Documents in future.

4.13 Proposals will not be supported where they do not address these policy requirements and where opportunities to improve the character and quality of the area in which they are located are not taken.

4.14 Innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area are encouraged, so long as they are appropriate with regard to the character, distinctiveness and amenities of the area and address the objectives and policies of the Local Plan as a whole.

4.15 The Council encourages applicants, especially major development proposals, to engage in early and ongoing pre application discussions about design and other material planning considerations with both the Local Planning Authority and the local community. In accordance with the NPPF, applications that can demonstrate early, proactive and effective engagement with the community will be looked on more favourably than those that cannot. Reference should be made to the Building Futures sustainable development initiative which provides the Hertfordshire Design Review Service.

4.16 Largescale major development schemes delivering more than 200 dwellings or over 10,000sqm floorspace are encouraged to undergo assessment by a Design Review Panel to provide independent, objective feedback and advice on design proposals. Applicants are strongly encouraged to undertake a design review at pre application stage and to show how feedback has informed proposals for a site. In considering proposals, regard will be had to the outcome of any review undertaken.

4.17 Steps will also be taken through the use of planning conditions and careful consideration for any proposed amendments after the grant of permission to ensure that the quality of approved development is not materially diminished between the grant of permission and completion. This will include (but is not limited to) consideration for materials, architectural detailing, landscaping and layouts.

Appendix 5 - Heritage and the Historic Environment

Heritage and the Historic Environment

Protection and Enhancement

- 1) The historic environment will be preserved and enhanced in a manner appropriate to its significance. Development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the District’s heritage assets and their settings and that will make a positive contribution to local character and distinctiveness will be supported.
- 2) Protecting and enhancing the wide range of historic and cultural assets which contribute to the character and identity of the District is a priority including:
 - Designated heritage assets such as Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas, and the settings of these assets;
 - Non-Designated heritage assets such as Locally Important Buildings, unregistered historic parks and gardens, the Grand Union Canal, and archaeology, and the settings of these assets.
- 3) Opportunities to promote the historic environment as a key element of the vitality of the District, and to reduce the number of heritage assets at risk will be sought.
- 4) Initiatives and opportunities to mitigate the effects of climate change by seeking the reuse of historic buildings, and where appropriate, their modification to reduce carbon emissions and secure sustainable development will be supported where this would not harm the significance of the heritage asset, or its setting.

Designated Heritage Assets

- 5) Applications for development which could impact upon a designated heritage asset must be supported by a Heritage Statement which demonstrates a clear understanding of the significance of any relevant heritage assets and the contribution of their settings, details the likely impacts of the proposal on these assets and their significance and where relevant, explains how this significance has informed the proposals. Proposals on sites which include, or have the potential to include, archaeological interest should be accompanied by an appropriate desk-based assessment, and where necessary a field evaluation.
- 6) There is a presumption in favour of the retention and enhancement of heritage assets and putting heritage assets to viable and appropriate uses to secure their future protection. Applications will be supported where they sustain, preserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.

- 7) The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF, as well as the criteria set out in this policy.
- 8) Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Development which results in substantial harm to or loss of Listed Buildings, registered parks or gardens, scheduled monuments, or other registered heritage assets, should be refused unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.
- 9) Any change of use of a Listed Building should preserve or enhance its character as a building of special architectural or historic interest and its significance, and should ensure its continued use and viability.
- 10) Extensions or alterations to a Listed Building should not adversely affect its character as a building of special architectural or historic interest, its significance or its wider setting.
- 11) Listed Building Consent is required for demolition or for any alteration or extension to a Listed Building which could affect its character (interiors as well as exteriors) and for works to any fixtures and to buildings or structures within the curtilage of the building. Control over changes to Listed Buildings is not intended to prevent all alterations but to protect the buildings from unnecessary demolition and from unsuitable alterations which would be detrimental to the historical significance of the building.
- 12) Proposals should not cause unacceptable harm to registered historic parks or gardens, their settings or public views into, out of, or within them. Proposals should seek to protect their character.
- 13) There is a presumption against any harm to Scheduled Monuments and heritage assets with archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments. Where the loss of the whole or a material part of a heritage asset's significance is justified, planning conditions will ensure that an adequate record is made of the significance of the heritage asset and this is published appropriately.

Conservation Areas

- 14) Within Conservation Areas, development will only be permitted if the proposal:
 - a) Is of a design and scale that preserves or enhances the character or appearance of the area;
 - b) Uses building materials, finishes, including those for features such as walls, railings, gates and hard surfacing, that are appropriate to the local context;

- c) Retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic value, including gardens, roadside banks and verges;
 - d) Retains and restores, where relevant, traditional features such as shop fronts, walls, railings, paved surfaces and street furniture, and improves the condition of structures worthy of retention;
 - e) Does not harm important public views into, out of or within the Conservation Area;
 - f) Protects trees, hedgerows and other significant landscape features and incorporates landscaping appropriate to the character and appearance of the Conservation Area.
- 15) Within Conservation Areas, permission for demolition or substantial demolition will only be granted if it can be demonstrated that:
- a) The structure to be demolished makes no contribution to the special character or appearance of the area, or;
 - b) It can be demonstrated that the structure is wholly beyond repair and incapable of beneficial use, or;
 - c) It can be demonstrated that the removal of the structure and its subsequent replacement with a new building and/or open space would lead to the enhancement of the Conservation Area.
- 16) Permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of, or public views in to or out of that Conservation Area
- 17) Proposals including solutions to shop front security and/or use of standardised shop front designs, fascias or advertisement displays in a Conservation Area will only be supported if they:
- a) Are sympathetic to the character and appearance of the Conservation Area;
 - b) Respect the scale, proportions, character and materials of construction of the upper part of the building and adjoining buildings, and the street scene in general;
 - c) Incorporate traditional materials where the age and character of the building makes this appropriate.
 - d) Comply with the requirements set out in Policy X (Advertisements)
- 18) Totally internally illuminated fascias or projecting signs will generally be unacceptable. Applications for additional signs that would result in a proliferation of, or an excess amount of, advertisement material on any individual building or group of buildings will not be supported.

Non-Designated Heritage Assets

- 19) The retention of Locally Important Buildings and non-designated heritage assets identified in adopted Neighbourhood Plans is encouraged. Proposals affecting Locally

Important Buildings should retain or enhance features of historic or architectural interest.

20) Where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building and all alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building.

21) Proposals should not cause unacceptable harm to unregistered historic parks or gardens of local significance, their settings or public views into, out of, or within them. Proposals should seek to protect their character.

Reasoned Justification

5.1 Protection of the District's heritage is an important function of the Council, particularly through the determination of planning applications. This policy seeks to reflect national policy and includes clarification on what characteristics will be considered when determining development within the historic environment of Three Rivers.

5.2 The District's historic environment is not just important for its own sake, but contributes towards the high quality of environment in the District and is an important resource bringing social, cultural, economic and environmental benefits to the community.

5.3 The historic environment is a finite and non-renewable resource. Heritage assets and the historic environment will be protected from inappropriate development to sustain and where appropriate enhance their significance, including putting heritage assets into uses consistent with their conservation. The more significant the heritage asset, the greater the presumption for its conservation.

5.4 Within Three Rivers, heritage assets which make a positive contribution to the historic environment include:

- Designated heritage assets such as Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas, and the setting of these assets;
- Non-Designated heritage assets such as Locally Important Buildings, unregistered historic parks and gardens, the Grand Union Canal, and archaeology, and the setting of these assets.

5.5 The significance of a heritage asset is a result of the value of the asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting which is the surroundings in which a heritage asset is experienced. The extent of the setting of a heritage asset is not fixed and may

change as the asset and its surroundings evolve. Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate the significance of the asset or may be neutral.

5.6 The conservation and enhancement of heritage assets will be given weight appropriate to the significance of the asset. The Council will seek to identify heritage assets at the earliest opportunity within the decision making process.

5.7 Historic England’s annual Heritage at Risk Register includes buildings, places of worship, monuments, parks and gardens, Conservation Areas, battlefields and wreck sites that are listed and have been assessed and found to be at risk. However, Grade II Listed Buildings outside of London, other than places of worship are not included.

5.8 The Register records condition, occupancy and use, vulnerability, priority actions and trends in condition. The Register currently includes just one entry in Three Rivers at Langleybury House¹. It notes that proposals for repair are yet to be implemented, and while use of the buildings for filming helps to ensure their protection the implementation of a comprehensive scheme remains desirable.

5.9 While Historic England’s annual Heritage at Risk Register would only record a Grade II Listed Building in the District as at risk if it was a place of worship, there may be other Grade II Listed Buildings in the area which are at risk as a result of neglect, decay or inappropriate development or are vulnerable to becoming so.

Enabling Development

5.10 Enabling development refers to development which would usually be considered harmful but is considered acceptable because the resulting benefits outweigh the harm.

5.11 Where relevant, the Council will consider whether the benefits of a proposal for enabling development which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset would outweigh the disbenefits of departing from those policies.

5.12 Further guidance on ‘Enabling Development and the Conservation of Significant Places’ is available at www.historicengland.org.uk.

Listed Buildings

5.13 Proposals should conserve or enhance Listed Buildings within Three Rivers.

5.14 The Government’s List of Buildings of Special Architectural or Historic Interests contains over 352 entries relating to buildings within Three Rivers which form an integral part of the District’s historic landscape. These buildings/structures are nationally listed and include historic homes such as Moor Park Mansion and Hunton Park, public houses, ecclesiastical buildings, and structures such as telephone kiosks, statues, war memorials and bridges

¹ Historic England (2023) Heritage at Risk 2023 Registers <https://historicengland.org.uk/images-books/publications/har-2023-registers/ee-har-register2023/>

including the railway bridge in Railway Terrace, Kings Langley designed by Robert Stephenson for the London and Birmingham Railway Company.

5.15 Listed Building Consent is required for demolition or for any alteration or extension to a Listed Building which could affect its character (interiors as well as exteriors) and for works to any fixtures and to buildings or structures within the curtilage of the building. Control over changes to Listed Buildings is not intended to prevent all alterations but to protect the buildings from unnecessary demolition and from unsuitable alterations which would be detrimental to the historical significance of the building.

5.16 All works to Listed Buildings must conserve or enhance these structures and their significance in accordance with national policy requirements.

Conservation Areas

5.17 In Three Rivers there are 22 Conservation Areas which make a very significant contribution to the character and distinctiveness of the District. These include the settlements around ancient commons such as Croxley Green, Chorleywood and Sarratt; the historic cores of the settlements of Rickmansworth and Abbots Langley; and distinctive areas of 19th and 20th century housing such as Loudwater, Moor Park and Heronsgate; the first Chartist settlement.

5.18 Conservation Areas are designated not on the basis of individual buildings but because of the special architectural or historic interest, quality of the area, its mix of uses, historic layout, characteristic materials, scale and detailing of open spaces. Designation also takes into account the need to protect trees, hedges, walls, railings and other characteristic features. Once designated, special attention must be paid in all planning decisions, to the desirability of preserving or enhancing its character and appearance.

5.19 Development within Conservation Areas should preserve or enhance their significance in accordance with national policy requirements and guidance on how significance will be considered can be found within this preferred policy.

5.20 The Council will continue with a programme of reviewing Conservation Area Appraisals which will assess the existing boundaries, character and important features of the District's Conservation Areas and develop Management Plans. These Appraisals and associated Management Plans will be used as a material consideration when assessing planning applications.

Locally Important Buildings

5.21 There are a large number of other buildings within the District that whilst not of sufficient quality or importance to be nationally listed, make a significant contribution to the local area in terms of their historical and/or architectural characteristics. Currently there are over 250 of these buildings on the Council's List of Locally Important Buildings. Many of these buildings were built in the nineteenth and twentieth Centuries, but all are considered an important part of the District's local heritage.

5.23 A list of Locally Important Buildings within Three Rivers can be found at:

<https://www.threerivers.gov.uk/egcl-page/locally-important-buildings>

Historic Parks and Gardens

5.24 Historic parks and gardens complement the historic buildings and landscapes of the District and are an important feature of the area. Some are listed on the Historic England Register of Parks and Gardens of Special Historic Interest. Within Three Rivers the grounds at Moor Park Mansion are listed as Grade II* because of their important contribution to the historic, recreational and conservation value of the landscape. Part of Cassiobury Park, which is a Grade II Listed Park, also extends into Three Rivers District.

5.25 In addition, there are other unregistered parks and gardens in the District of significance which include Rickmansworth Park, The Grove, Oxhey Grange, Sandy Lodge, Redheath, Micklefield Green and Chorleywood House. Although these currently fall below the threshold for inclusion in the Historic England Register, they are of importance locally and as such their character will be protected from harmful development.

Archaeology and Scheduled Monuments

5.26 There are 19 sites of known archaeological significance in the District and three Scheduled Monuments. Information and advice about these and other non-designated heritage assets with archaeological interest may be obtained from the historic Environment Unit of Hertfordshire County Council.

5.27 The Areas of Archaeological Significance are subject to regular revision, and the absence of designation should not be taken to mean that there is no archaeological potential.

5.28 Prospective developers should contact the County Council to obtain the most up-to-date information and establish whether there is potential archaeological interest and establish the need for investigation and evaluation at an early stage.

5.29 Proposals on sites which include, or have the potential to include, archaeological interest should be accompanied by an appropriate desk-based assessment, and where necessary a field evaluation.

5.30 The NPPF requires us to provide a positive strategy for the conservation and enjoyment of the historic environment and this policy aims to protect, conserve and enhance our historic environment and the heritage assets within it.

5.31 We will also:

- a) support proposals which conserve and enhance the historic environment
- b) carry out a programme of reviewing existing conservation areas and producing conservation area appraisals to identify what it is about the area that contributes to its significance as well as identifying and considering new areas for designation as conservation areas

- c) support proposals for heritage-led regeneration, ensuring that heritage assets are conserved, enhanced and secured for the future
- d) identify heritage assets that make an important contribution to the local character of the area and update our local list on a regular basis
- e) identify buildings that could be included on the national list and preparing reports to support new listings
- f) identify buildings that are falling into disrepair and work with owners to find new uses to ensure their continued beneficial use.

Appendix 6 - Social and Community Uses

Social and Community Uses

1) Proposals for the redevelopment or change of use of any premises resulting in the loss of social or community facilities, assets of community value, or services that support the local community, will not be permitted unless:

a) A replacement facility is provided on-site, offering a level of accessibility and standard of provision at least equal to that of the existing facility which would continue to meet the need of the local population; or

b) The facility or service concerned will be adequately supplied or met by an easily accessible existing or new facility in an appropriate alternative location, served by sustainable modes of transport; or

c) It can be demonstrated that there is no current or forecast future demand for the use or an alternative social or community use through provision of marketing information and an impact assessment to show why the site cannot support the social or community use and identify impacts on users; And

d) The premises or site cannot readily be used for, or converted to, any other community facility.

2) Where a use is no longer economically viable, the Council will require supporting information setting out reasons as to why the use is no longer viable and cannot be made viable in the foreseeable future. This may include details of previous use, accounts and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time and that no suitable user has been/or is likely to be found.

New Provision and Enhancement

3) The council will support proposals to provide new and/or extended or enhanced social and community infrastructure facilities and their co-location with other social and community uses, subject to an assessment against all relevant Local Plan policies.

4) Social and community infrastructure will be funded through the Community Infrastructure Levy (CIL) and/or section 106 planning obligations (as appropriate). In addition, new and/or extended on-site provision of social and community infrastructure may be required as part of the supporting infrastructure for significant new housing and mixed-use development proposals where it is necessary to mitigate the impacts of the development on local services and meet the needs of occupiers.

5) Development resulting in the provision of new social and community facilities which are not generally accessible or available to the public, such as school sports facilities, will be required to enter into Community Use Agreements to allow and promote access by local communities to the facility.

6) Proposals for new or improved social or community facilities, including extensions to existing facilities will be supported where they are in accordance with relevant objectives and other policies of the Local Plan and:

a) Are located in areas convenient for the community they would serve and be accessible by a range of sustainable modes of transport including walking, cycling and public transport;

b) Provide spaces and buildings which are inclusive, accessible, flexible and sustainable and which meet the needs of intended users;

c) Are designed and sited to maximise shared use of the facility; and

d) A strategic or local need can be identified for the new/improved social or community facility.

Reasoned Justification

6.1 It is vital that all residents have good access to community, leisure and cultural facilities and it is recognised that the loss of these facilities can have a detrimental impact upon an individual's quality of life. Social and community facilities, whether publicly or privately owned, can be subject to development pressures from alternative uses. It is therefore important that where appropriate such facilities are retained within the local community.

6.2 In addition, ensuring that new development is supported by a suitable level of social and community infrastructure is important not only for the quality of life of residents in new developments, but also for the existing population who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in Three Rivers.

Appendix 7 – Flood Risk and Water Resources

7.1 Areas within Three Rivers are at risk of flooding from rivers, surface water, groundwater, sewers and reservoirs and the effects of climate change are predicted to increase the risk of flooding in the District. Three Rivers is located in one of the driest parts of the UK, with Hertfordshire's average rainfall returning only two-thirds of the national average. Due to the potential impacts of climate change and the increasing pressure for development across the District, it is vital that developments are safe and resilient to the risk of flooding, that water quality is enhanced and that development makes efficient use of water resources.

Flood Risk & Water Resources

Flood Risk

- 1) In locations identified as being at risk of flooding from any source, planning permission will only be granted where sequential and exception tests¹ have been undertaken and passed as necessary and where the requirements set out in national policy have been demonstrated through a site-specific flood risk assessment.
- 2) Development will only be permitted where it would not be subject to unacceptable risk of flooding and would not exacerbate the risk of flooding within the site or elsewhere. Wherever practicable and feasible, development should reduce existing flood risks to and from the site.
- 3) New development will not be permitted in Flood Zone 3b, as defined by the Environment Agency. Redevelopment of existing built development in Flood Zone 3b will only be permitted where a less vulnerable use class as per the Environment Agency is proposed and ensuring no loss of floodplain or an increase in flood risk elsewhere.
- 4) A Flood Risk Assessment (FRA) will be required for development proposals of 1ha or greater in area within Flood Zone 1, for any proposals for development within Flood Zones 2 and 3; for proposals within Flood Zone 1, where proposed development or a change of use to a more vulnerable class may be

¹ The Sequential and Exception Tests are not required for applications for some minor development (householder development, non-residential extensions of less than 250sqm) and changes of use (unless the change of use would introduce a more vulnerable use to flood risk). However, if applicable, these applications should be supported by site-specific FRAs. For allocated housing sites, the Sequential Test is not required but the Exception Test may need to be reapplied.

subject to other sources of flooding, as identified in the SFRA or by the Lead Local Flood Authority.

- 5) Development should be designed using a sequential approach; the most vulnerable uses of proposed development should be located in the areas of lowest flood risk within a site, unless there are overriding reasons to prefer a different location. The site and building design will need to ensure that development is safe and resilient to flood risk and to any residual risk in flood defended areas.
- 6) Development at risk of flooding should be flood resilient and resistant through appropriate mitigation measures. Safe access and egress routes are required for development at risk of flooding and for changes of use to a more vulnerable use; it should be demonstrated that residual risks can be safely managed.
- 7) Finished Floor Levels (FFLs) of development in Flood Zones 2 and 3 should be situated at a freeboard of at least 300mm above the modelled 1% (1 in 100 year) plus climate change predicted maximum water levels. FFLs should also be 300mm above the modelled 1 in 100-year (1%) AEP surface water level with allowance for climate change. If no surface water model is available, FFLs should be 300mm above ground level.
- 8) Major development in all areas will require Sustainable Drainage Systems to reduce surface water runoff to greenfield rates or less. Minor developments which incorporate Sustainable Drainage Systems into their designs will be encouraged.
- 9) Where appropriate, developers will be required to show that any necessary flood protection and mitigation measures will not have unacceptable impacts on nature conservation, landscape character, recreation or other important matters.
- 10) Development should maintain a minimum distance of 8m from a main river (as defined by the Environment Agency) and a minimum distance of 5m from any ordinary watercourse, in order to maintain the riparian habitat and provide access for maintenance.

Water Resources

- (11) The Council will support development where:
- a) the quantity and quality of surface and groundwater resources are protected from pollution and where possible enhanced.
 - b) it will not be at risk or adversely affected by unacceptable levels of aquatic pollution.
 - c) Efficient use is made of water resources and account taken of climate change. This means incorporating all or some of the following measures as part of development:
 - I. Rainwater harvesting techniques (for example providing waterbutts fitted to drainpipes and rainwater storage tanks as part of new development)
 - II. Harvesting and recycling greywater (wastewater from baths, showers, washbasins, kitchen sinks)
 - III. Using water efficient appliances (for showers, taps, washing machines, toilets etc.)
 - IV. Using water efficient landscaping and irrigation measures (for example by using drought tolerant plants)
 - V. New development adjacent to watercourses should seek to restore rivers to their natural state, including through de-culverting piped watercourses. Further culverting and building or within 8m of existing culverts will not be permitted.
 - d) Any development adjacent to, over or in a watercourse needs to take into account consideration of the Water Framework Directive requirements and opportunities outlined in the Thames River Basin Management Plan. All developments should seek to improve the biodiversity of the site and contribute towards the riparian corridor's ability to be used by migrating species.
 - e) All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day. Non-residential development achieving the 'BREEAM Excellent' rating for water efficiency will be supported.
 - f) Where appropriate, planning permission for developments resulting in the need for off-site upgrades to wastewater infrastructure will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.

Reasoned Justification

Flood Risk

7.2 National Policy aims to ensure that flood risk is taken into account at all stages of the planning process and to avoid inappropriate development in areas at risk from flooding by directing development away from areas at highest risk. Where development cannot be allocated or granted permission in areas of low risk, it must be made safe without increasing flood risk elsewhere.

7.3 The District is mapped according to the level of flood risk; Flood Zones in Three Rivers are defined in the Council's Strategic Flood Risk Assessment.

Flood Zone	Definition
Zone 1 – Low Probability	Land having a less than 1 in 1,000 annual probability of flooding from rivers or sea.
Zone 2 – Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of flooding from rivers or sea.
Zone 3a – High Probability	Land having a 1 in 100 or greater annual probability of flooding from rivers or sea.
Zone 3b – The Functional Floodplain	Land providing flood storage or where water has to flow in times of flood.

7.4 Through applying a risk-based, sequential approach, the overall aim is to steer new development to Flood Zone 1 (low risk) in the first instance. Development in Zone 2 and Zone 3a may be considered if no other preferable, reasonably available sites in areas of lower flood risk exist and both parts of an 'Exception Test' are satisfied. Development in Flood Zone 3b will not be permitted; Flood Zone 3b will be protected as the functional floodplain and its capacity to attenuate periodic flood events will not be compromised. When applying the Sequential Test to individual planning applications, a pragmatic approach on the availability of alternative sites should be taken.

7.5 Although Flood Zone 1 represents areas of low flood risk, it does not account for the risk of flooding from other sources (e.g. surface water, groundwater). Under the NPPF, all sources of flood risk and the impacts of climate change, must be taken into account.

Site-specific Flood Risk Assessments (FRAs)

7.6 Site-specific FRAs should demonstrate how flood risk will be managed, taking into account climate change and having regard to the vulnerability of different land uses to flood risk. FRAs should make optimum use of already available information, for example from the

SFRA, the Environment Agency and the Lead Local Flood Authority (LLFA). The detail contained in FRAs should be proportionate to the degree of flood risk and appropriate to the scale, nature and location of development².

7.7 National planning guidance³ provides a 'checklist' of information to be included in a site-specific FRAs. In addition, for sites located in catchments identified in the SFRA as highly sensitive to the cumulative impact of development, site-specific FRAs should also require consideration of the cumulative effects of the proposed development and should demonstrate that flood risk downstream will not be made worse as a result of cumulative development. Where developments are located in areas benefitting from defences or adjacent to a canal, FRAs should include an assessment of the residual risk, considering the impact of breach, including the effect on safe access and egress, as well as potential for flood risk to increase in the future due to overtopping.

Strategic Flood Risk Assessment (SFRA)

7.8 As a means of assessing levels of risk, the Council in conjunction with adjoining authorities in South West Hertfordshire commissioned a Strategic Flood Risk Assessment.

The SFRA defines the flood risk within the District, taking into account all sources of flooding and future climate change impacts. The document details the following flood risk objectives:

- Achieve a reduction in flood risk through spatial planning and site design;
- Consider the cross-boundary and cumulative impacts of flood risk;
- Inform flood risk and drainage assessments and promote SuDS; and
- Identify strategic flood risk solutions, including river and floodplain restoration and enhancement.

7.9 The SFRA considered the risk of flooding to individual sites as well as the cumulative impacts which successive developments may have on flood risk within a river catchment. The Colne (Ver to Gade) and Gade (Bulbourne to Chess) catchments were identified as highly sensitive to the cumulative impact of development. In order to manage the cumulative impact of development on flood risk, all new development (other than minor extensions) in the Colne (Ver to Gade) and Gade (Bulbourne to Chess) catchments should provide wider betterment by demonstrating site-specific FRAs and Surface Water Drainage Strategies what measures can be put in place to contribute to a reduction in flood risk downstream. This may either be by provision of additional storage on site (e.g. SuDS with long-term storage, natural flood management techniques, green-blue corridors) and/or by providing a contribution towards any wider schemes.

Sustainable Urban Drainage Systems (SuDS)

7.10 The use of Sustainable Drainage Systems (SuDS) to manage surface water flows is an important tool in managing flood risk, designed to control surface water run off close to where it falls and to mimic natural drainage as closely as possible. SuDS increases permeable

² NPPG Flood Risk and Coastal Change, Paragraph: 021

³ NPPG Flood Risk and Coastal Change, Paragraph: 080

surfaces in development, allowing water to seep into the ground rather than running off directly into rivers and drainage systems. SuDS also help to reduce the burden on traditional water management systems such as sewers and reduce the impact of pollution on receiving water bodies. Proposals incorporating SuDS should seek to deliver multifunctional benefits for green space and amenity, recreation and wildlife.

7.11 SuDS should be integrated into the design of all development sites, although as the effectiveness of SuDS within a site is dependent on the site characteristics (such as topography, geology, soil permeability and existing flow paths across the site), the techniques used should be appropriate to local conditions. Surface Water Drainage Strategies will be required for major development and where appropriate, for minor developments. Where SuDS are implemented, the systems used should take account of advice from the LLFA, have appropriate proposed minimum operational standards and have maintenance arrangements to ensure operation for the development's lifetime. Where implemented on major and minor developments, SuDS schemes should reduce runoff to greenfield rates or less, unless achieving this standard is shown to be unreasonable.

Buffer Zones

7.12 In order to maintain the riparian habitat and provide access for maintenance, a minimum 8m buffer zone from development to a main river (as defined by the Environment Agency) will be required. The 8m distance is required from the top of the river bank and the buffer zone should be used to exclude any development, including hardstanding, paths and lighting. Buffer zones should be used as green spaces, with native planting encouraged. Buffer zones should not be used for the storage of materials. Between an ordinary watercourse and development, a minimum distance of 5m will be required.

Further Guidance

7.13 Applicants are advised to consult the Level 1 and 2 SFRA for information on areas at risk from flooding. Where required by applicants, Hertfordshire County Council (as the LLFA), the Environment Agency and Thames Water can be contacted for more detailed flood risk information.

7.14 In some cases, developers will be required to contribute to the delivery of flood risk management schemes and facilities, as identified in the South West Herts Level 1 SFRA, the Three Rivers Level 2 SFRA and other relevant plans such as the Local Flood Risk Management Strategy for Hertfordshire.-If identified as appropriate in a site-specific FRA, developers will be required to work with the emergency services and emergency planners to prepare an acceptable Flood Warning and Evacuation Plan, in order to safely manage residual flood risk.

7.15 Further guidance on ways flood risk and ways to deliver SuDS are contained in the following documents (and subsequent updates):

- SuDS Design Guidance for Hertfordshire⁴;
- Lead Local Flood Authority SuDS Policy Statement: Meeting SuDS Standards in Hertfordshire⁵;
- Roads in Hertfordshire – Highways Design Guide⁶; and
- Three Rivers Surface Water Management Plan (in draft).

Water Resources

7.16 The Three Rivers District is entirely underlain by a chalk aquifer, which is the main drinking water resource for the area and a regionally important source of groundwater. It is important to protect this resource from pollution and to safeguard it, taking into account future climate change. The Three Rivers area has a large number of surface water resources including the Rivers Colne, Gade and Chess, the Grand Union Canal, as well as several lakes and ponds, particularly within the floodplain of the River Colne.

7.17 It is essential for development to protect and, where possible, enhance water quality. This means controlling pollution, protecting and enhancing the quality and quantity of groundwater, and protecting and enhancing surface water resources, such as through the use of SuDS to manage surface water. Development should ensure, where possible, that it carries out measures found in the Thames River Basin Management Plan and should ensure that there is no deterioration in the status of designated water bodies. Changes to the design of developments and the implementation of mitigation measures should ensure potential harm to water bodies is prevented, however, where it is likely that a proposal would have a significant adverse impact on water quality, a more detailed assessment will be required⁷. If adequate mitigation cannot be provided against any significant adverse impact on water quality, the application should be refused.

7.18 Three Rivers is an area of serious water stress (as classified by the Environment Agency)⁸, so reducing water consumption levels is important. Measures that will reduce water consumption will be expected, recognising that the incorporation of water efficiency measures into developments is essential to prepare and be able to adapt to climate change and increased water demand in future. The efficient use of water resources, including water reuse and recycling, should be sought through sustainable construction methods (such as rainwater harvesting) that conserve and make prudent use of water and other natural

⁴ Hertfordshire County Council (2015) SuDS Design Guidance for Hertfordshire. <https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/water/surface-water-drainage/guidance-for-suds-in-hertfordshire.pdf>

⁵ Hertfordshire County Council (2016) Lead Local Flood Authority SuDS Policy Statement <https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/water/surface-water-drainage/suds-policies-rev1-v2-webpage.pdf>

⁶ Hertfordshire County Council (2011) Roads in Hertfordshire - Highway Design Guide <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx#highwaydesignguide>

⁷ The requirements of a detailed water quality assessment are set out in NPPG (Water supply, wastewater and water quality; Paragraph: 016).

⁸ The Environment Agency (2021) Water stressed areas – final classification <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>. ‘Serious’ water stress is identified as an area where the current or future demand for household water is, or is likely to be, a high proportion of the effective rainfall which is available to meet that demand.

resources. Water-efficient appliances (for showers, taps, washing machines, toilets, etc.) and water-efficient landscaping and irrigating measures in new developments will also help to support sustainable supplies of water for the future.

7.19 Given the District's location in an area of serious water stress and the estimated future shortfall in water supply, all new developments will be expected to meet the water efficiency standard of 110 litres per person per day (or less). Older buildings are often the least efficient in resource use and therefore, where opportunities arise through the refurbishment or change of use of existing buildings, retrofitting to improve the water efficiency of buildings will be supported⁹. The Environment Agency's Thames River Basin Management Plan and Affinity Water support the adoption of this standard, given the need to ensure long-term water efficiency and supply. The Colne Abstraction Licensing Strategy (2019)¹⁰ shows that the Environment Agency were unable to grant new licences for abstraction from surface waters and most groundwater areas, further evidencing the stress on water availability in Three Rivers and the subsequent need to incorporate water efficiency measures into development.

Waste Water & Sewage

7.20 Three Rivers will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint, where appropriate, phasing conditions will be applied in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

7.21 It is noted that many existing water mains and sewerage systems are increasingly becoming overloaded by successive development. It is therefore crucial to ensure that adequate infrastructure is in place prior to development, in order to avoid impacts such as sewage flooding of existing residential dwellings and commercial premises. New development must be served by an adequate means of water supply and sufficient foul and surface water drainage and adequate provision must be made for water supply and sewerage infrastructure.

7.22 The Water Cycle Study Scoping Report (2010) for South West Hertfordshire highlighted the restrictions in the capacity of Maple Lodge and Blackbirds Wastewater Treatment Works in accommodating growth. Upgrading of the sewerage infrastructure across South West Hertfordshire was identified as a requirement. These conclusions were reinforced in the Draft Hertfordshire Water Study (2017) which concluded that in the longer term (2031-2051), strategic investment will be required to increase the capacity of major sewage

⁹ The BREEAM Refurbishment and Fit-Out Technical Standard provides guidance to support retrofitting. BREEAM UK (2014) Refurbishment and Fit-out Technical Standard <https://breeam.com/standards/refurbishment>

¹⁰ The Environment Agency (2019) Colne abstraction licensing strategy. <https://www.gov.uk/government/publications/colne-catchment-abstraction-licensing-strategy>

treatment works in Hertfordshire, including Maple Lodge STW. This infrastructure requirement is detailed further in the Infrastructure Delivery Plan (IDP).

7.23 Further guidance on ways to conserve water are contained in the following documents (and subsequent updates):

- Building Futures: A Hertfordshire guide to promoting sustainability in development¹¹;
- Affinity Water: Water Resource Management Plan¹²; and
- Thames River Basin Management Plan¹³.
- BREEAM New Construction Technical Standards
- BREEAM Refurbishment and Fit-Out Technical Standard

¹¹ Building Futures (2008) Building Futures: A Hertfordshire Guide to Promoting Sustainable Development
<https://www.hertfordshire.gov.uk/microsites/building-futures/about-us.aspx>

¹² Affinity Water (2019) *Draft* Final Water Resources Management Plan
<https://www.affinitywater.co.uk/corporate/plans/water-resources-plan>

¹³ DEFRA and The Environment Agency (2015) Thames River Basin Management Plan
<https://www.gov.uk/government/collections/river-basin-management-plans-2015>

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Appendix 8 - Ground Conditions, Contamination and Pollution

Ground Conditions, Contamination and Pollution

1) Development must not contribute to, be put at unacceptable risk from, or be adversely affected by unacceptable levels of ground, air, water, light or noise pollution, odour, vibration, disturbance or land instability. Where mitigation measures are required to avoid unacceptable impacts, details of these should accompany a planning application and these must be capable of being implemented and permanently maintained. Measures to protect and enhance water quality are provided in the Flood Risk and Water Resources policy.

2) Opportunities should be taken to improve local environmental conditions and/or to remediate or mitigate despoiled, degraded, derelict, contaminated or unstable land.

Ground Conditions

3) The Council will only grant planning permission for development on, or near to, former landfill sites or on land which is suspected to be contaminated or subject to land instability, where the Council is satisfied that:

- a) There will be no threat to future users or occupiers of the site or neighbouring land; and
- b) There will be no adverse impact on the quality of local groundwater or surface water quality.

Air Quality

4) Development will be permitted where it would not:

- a) Have an adverse impact on air pollution levels, particularly where it would adversely affect air quality in an Air Quality Management Area; or
- b) Give rise to, or be subject to unacceptable levels of air pollutants, odour or disturbance from existing pollutant sources.

Noise and Vibration

5) Development will be permitted where it would not:

- a) Have an unacceptable adverse impact on the indoor and outdoor acoustic environment of existing or planned development, or give rise to unacceptable vibration impacts;
- b) Have an unacceptable adverse impact on countryside areas of tranquillity which are important for wildlife and countryside recreation; or
- c) Be subject to unacceptable noise or vibration levels or disturbance from existing noise or vibration sources whether irregular or not.

6) Noise or vibration from proposed commercial, industrial, recreational or transport use should not cause any significant increase in the background noise or vibration level of nearby existing noise-sensitive premises such as dwellings, hospitals, residential institutions, nursing homes, hotels, guesthouses, schools and other educational establishments.

7) Proposals which have the potential to cause or exacerbate noise and vibration impacts on land uses or occupiers in the locality, or which may be affected by existing sources of noise or vibration, must fully assess such impacts.

Lighting

8) Development proposals which include external lighting should ensure that:

- a) Proposed lighting schemes are the minimum required for public safety and security;
- b) There are no unacceptable adverse impacts on neighbouring or nearby properties;
- c) There is no unacceptable adverse impact on the surrounding countryside;
- d) There is no dazzling or distraction to road users including cyclists, equestrians and pedestrians;
- e) Road and footway lighting meets the County Council's adopted standard;
- f) There is no unacceptable adverse impact on wildlife, habitats or habitat features;
- g) Light pollution will be minimised by following the latest guidance of the Institute of Lighting Professionals; and
- h) Appropriate technologies will be used to minimise the energy usage required and carbon generated. This may include the energy source, bulb, daylight or movement sensors, or timers and hours of illumination shall be controlled.

Reasoned justification

8.1 It is important that a site is suitable for its proposed use taking account of ground conditions, including land instability and contamination.

8.2 To protect the environment and quality of life it is also important that existing or new development is not adversely affected by or put at unacceptable risk from unacceptable levels of ground, air, water or noise pollution.

8.3 The District enjoys a generally high environmental standard. However, the minimisation of pollution and contamination remains a key local priority. We will therefore consider the possible polluting effects of a development proposal on aspects such as amenity and surrounding land-uses, and will take account of the agent of change principle

8.4 Where possible, we will require development proposals to take opportunities to improve local environmental conditions and to remediate or mitigate despoiled, degraded, derelict, contaminated or unstable land.

Pollution

8.5 Pollution can be in many forms and may include emissions to land, air or water including noise, light, vibration, smell, smoke and fumes, soot, ash, dust or grit which has a damaging effect on the environment and the public's enjoyment, health or amenity. The planning system has an important role to play in protecting the environment, biodiversity, local residents, businesses and the public in general from all forms of development that could give rise to pollution.

8.6 While in many cases pollution control regimes are governed by legislation outside of the planning process, the NPPF emphasises that planning policies and decisions should contribute to and enhance the natural environment which includes consideration for pollution, land instability and contamination.

8.7 As part of this role, both existing and new development, including changes of use, should be protected from unacceptable levels of pollution or instability as required by this preferred policy. Measures to protect and enhance water quality are provided in Preferred Policy Option 15 (Flood Risk and Water Resources).

Ground Conditions

8.8 The Spatial Strategy for the District prioritises the use of previously developed brownfield land to deliver the growth needed in the District. However, the risk of pollution arising from contamination and the impact on human health, property and the wider environment also needs to be considered.

8.9 The Council maintains a register of contaminated land. The information stored on the formal register is that relating to regulatory action and remediation that has been undertaken at sites within the District. There are currently no sites listed on the Council's Contaminated Land Register.

8.10 Contamination is more likely to arise in former industrial areas but cannot be ruled out in other locations, including in the countryside. Some areas may be affected by the natural or background occurrence of potentially hazardous substances, such as radon, methane or elevated concentrations of metallic elements.

8.11 Land instability may also affect the suitability of a site to accommodate development, and proposals will need to demonstrate that any such sites are, or can be made safe.

8.12 Whether contamination or land instability affects a particular site can only be identified through a specific investigation. To establish the risks possessed by a site, it is necessary for applicants to use a competent and suitably experienced consultant to investigate and, where necessary, remediate contamination to mitigate the risk in accordance with best practice guidance.

8.13 Where an application relates to contaminated land or land which is suspected to be contaminated, applicants will need to submit details of an investigation of the site detailing any remedial measures that need to be carried out. The approved remedial measures will be secured through the use of planning conditions.

Air Quality

8.14 Air pollutants (including dust and odour) have been shown to have an adverse effect on health and the environment, and the 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2).

8.15 The Council is also required to carry out a review and assessment of air quality across the District. This involves measuring air pollution and trying to predict how it will change in the next few years. The aim of the review is to make sure that the national air quality objectives are achieved by the relevant deadlines. These objectives have been put into place to protect public health and the environment. In locations where the objectives are not likely to be achieved, the Council will designate an Air Quality Management Area and will put together a plan to improve the air quality through a Local Air Quality Action Plan.

8.16 There are currently two Air Quality Management Areas (AQMA) within the District. The Chorleywood NO2 AQMA covers an area along the M25 south of Junction 18 to just north of where the motorway crosses the River Chess. The Chorleywood PM10 AQMA is a slightly narrower area from just north of Junction 18, along the M25 to just north of where the motorway crosses the River Chess.

8.17 However, to ensure that objectives can continue to be met in future and to secure improvements in air quality, emissions arising from any development including indirect emissions, such as those attributable to associated traffic generation, must therefore be considered in determining planning applications. Developments sensitive to air pollutants should also be located where future occupiers would not be subject to unacceptable levels of air pollutants from existing sources.

8.18 Applicants for development should have regard to any emissions arising from the proposed use/development, and seek to minimise those emissions to control any risks arising and prevent any adverse impact on local amenity. Environmental Health will be consulted on applications which may affect air quality.

8.19 Proposals that can raise issues of odour emissions, for example extraction systems for restaurants/takeaways, must be accompanied by details of the equipment to be installed including any odour abatement measures.

8.20 Where significant increases in emissions covered by the nationally prescribed air quality objectives are proposed, the applicant will need to assess the impact on local air quality by undertaking an appropriate modelling exercise to show that the national objectives will still be achieved.

Noise and Vibration

8.21 To support the health and quality of life of the community, it is important to ensure noise-sensitive developments are located away from existing sources of significant noise and that potentially noisy developments are located in areas where noise or vibrations will not give rise to adverse impacts on surrounding occupiers or the environment, or where impacts can be minimised and mitigated.

8.22 In considering noise and vibration impacts, the Council will have regard to the National Planning Practice Guidance and Explanatory Note of the Noise Policy Statement for England.

8.23 Where proposals may create or be subject to noise and/or vibration, applications will need to be supported by a noise and vibration assessment to consider impacts and any resulting requirement for mitigation. The scheme should aim to design out the exposure of noise-sensitive receptors to strategic traffic, using either or a combination of a landscape buffer and acoustic bund designed to shield the settlement from motorway noise. In accordance with the DfT Circular 02/2013 Annex A A1, all noise fences, screening and other structures must be erected on site, and far enough to enable maintenance to take place without encroachment onto highway land.

8.24 Proposals that can raise issues of noise, for example extraction systems for restaurants/takeaways, must be accompanied by details of the equipment to be installed including any noise abatement measures.

8.25 Necessary mitigation measures will need to be implemented and maintained in the long term and will be secured by condition.

Lighting

8.26 In common with all other built-up areas, artificial lighting is essential for safety and security within the District. There may also be some opportunities to add to the amenity of the built environment by highlighting buildings and open spaces of character. However, it is important to avoid insensitive lighting (light pollution) which can have a negative effect on the amenity of surrounding areas and have a negative impact on biodiversity by influencing plant and animal activity patterns. In particular, light pollution can be harmful to birds, bats, and other nocturnal species that avoid overly lit areas.

8.27 Under the agent of change principle, if new development or uses are to be introduced near a pre-existing business, such as a live music venue, or sports facility it is the responsibility of the developer to ensure solutions to address and mitigate noise and/or light are put forward as part of proposals.

8.28 Proposals incorporating new lighting may require a Lighting Impact Assessment to consider potential for impacts and any measures to mitigate these. Necessary mitigation measures will be secured by condition.

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Appendix 9 - Waste Management and Recycling

Waste Management and Recycling
<ol style="list-style-type: none">1) New development proposals should provide waste and recycling facilities in accordance with the Council's Solid Waste Storage/Collection Guidance (2019) or subsequent updates which:<ol style="list-style-type: none">a) Can be easily accessed and moved by occupiers and local authority/private waste collectors;b) Do not result in any adverse impact on the character and appearance of the area through their siting or design, including bins and their respective storage areas; andc) Would not result in obstruction to pedestrian, cyclists or driver sight lines.2) New development should contribute to reducing the amount of waste generated through the following measures where possible:<ol style="list-style-type: none">a) Re-using materials wherever possible as part of construction (see Policy X Adapting to Climate Change and Sustainable Construction)b) Enable the sorting of waste and recycling on-site taking into account impact on residential amenities and the environment;c) Using Modern Methods of Construction such as pre-cast/pre-fabricated materials and modular construction;d) Allocating appropriate refuse and recycling storage facilities for domestic kerbside collection, composting facilities and commercial waste recycling facilities; ande) Submitting a Site Waste Management Plan for major projects incorporating a Circular Economy Statement;3) New development should explore opportunistic extraction of minerals for use on site, prior to non-mineral development.

Reasoned Justification

9.1 Whilst the responsibility for dealing with waste (and minerals) in Three Rivers lies principally with Hertfordshire County Council, the District Council can help promote kerbside collection and community recycling through planning policy. The adopted Waste Core Strategy & Development Management Policies DPD form part of the Development Plan for the district.

9.2 A key part of this is ensuring that residents and businesses have sufficiently convenient facilities and storage to maximise re-use and recycling, and that this provision is integrated through the design and layout of development without adverse impact on the street scene or, in less developed areas, the local landscape.

9.3 During 2022/23, 471,499 tonnes of Local Authority Collected Waste was produced across Hertfordshire. In 2022/23 51.2% of Hertfordshire's collected waste was recycled or

composted. Three Rivers achieved a 61.5% 'household waste' recycling rate, the highest in Hertfordshire and the second highest rate of any authority in the country.

9.4 Despite this excellent performance, there is still a need to reduce the amount of waste produced overall and to ensure that as little as possible is placed in the refuse bin. Reusing waste products and materials, and reclaiming materials through recycling can reduce our consumption of primary resources and support the move to a circular economy.

9.5 In addition, commercial and industrial sources and construction, demolition and excavation waste also make a significant contribution to the overall levels of waste produced. These should similarly be minimised.

9.6 Reducing the amount of waste produced locally requires:

- Re-use of materials wherever possible: high value materials such as bricks, slates, tiles, beams and architectural details can often be re-used for the same function;
- Sorting of waste and recycling on-site: allowing space on-site for segregation of waste, including construction waste and recycling and operational waste and recycling;
- Allocating appropriate recycling storage facilities: providing sufficient space within development for domestic kerbside collection and composting facilities, or larger commercial waste recycling facilities;
- Use of Modern Methods of Construction such as pre-cast/pre-fabricated materials and modular construction: components such as precast concrete beams, insulated wall panels, bathroom pods reduce the amount of waste generated;
- Use of materials with recycled content: products are available that incorporate waste into the manufacturing process that have the same performance and costs as non-recycled materials.

9.7 Making suitable provision to encourage recycling and minimise waste production requires that waste and recycling storage areas are integrated into the design and layout of new development at the initial stages.

9.8 The policy requires that Circular Economy Statements are submitted for all major projects (as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015) which include details of the management of waste at all stages of development (construction, demolition and subsequent occupation). The Waste Planning Authority will be consulted in the process as part of the formal planning application.

Appendix 10 – Landscape Character

10.1 The landscape of Three Rivers is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other landforms. Wildlife habitats such as meadows, woodlands, hedgerows, orchards and wetlands are valued landscape components and have their own special management requirements.

10.2 Three Rivers incorporates 546 hectares of the Chilterns National Landscape, an area of national landscape importance, generally made up of a mosaic of woodland, copses, enclosed pastures, arable fields, wooded and open heath and scattered farms and villages, overlying rolling hills and valleys. The parts of the National Landscape within the District consist largely of chalk streams, rivers, valleys and adjacent hillsides and woods.

10.3 As there will be increasing pressure for development across the District, it is important that all landscape, including the Chilterns National Landscape, is conserved and enhanced. The preferred policy approach ensures that the design of development proposals is sensitive enough to ensure that schemes make a positive contribution to the landscape.

Landscape Character

1) Chilterns National Landscape

The Chilterns National Landscape is a nationally important landscape designation, and development proposals are expected to conserve and enhance the landscape and scenic beauty within the area, its cultural significance and wildlife habitats.

There is a presumption against major development (10 dwellings or more, or greater than 0.5ha) in the National Landscape unless it can be demonstrated that there are exceptional circumstances and the development is in the public interest. Whether a development constitutes a ‘major development’ will be assessed on a site-by-site basis taking account of the nature and scale of the proposal and its relation to the local context and whether it could have a significant adverse impact on the purposes of the National Landscape designation. Planning permission will be granted for development within the Chilterns National Landscape only if the proposal:

- a) preserves and enhances the special qualities, distinctive character and natural features which contribute to the National Landscape;
- b) has regard to the National Landscape Management Plan, Chilterns Buildings Design Guide and technical notes by being of high-quality design which respects the natural beauty of the Chilterns and its traditional built character, and reinforces the sense of place and local character;
- c) avoids adverse impacts from individual proposals and any cumulative effects, unless these can be satisfactorily mitigated;

- d) does not harm important views into, out of or within the National Landscape; and
- e) submits landscape visual impact assessment where the development is within the National Landscape area or will likely affect its setting.

2) **Landscape Regions**

Proposals that have an impact on the distinctive landscape character in which they are set will be required to demonstrate that they have taken into consideration the key characteristics, attributes and sensitivities of the landscape typology in which the proposed development is to be located, together with the landscape guidelines set out in the Hertfordshire Landscape Character Assessment for Three Rivers.

The Council will support proposals that:

- a) Lead to the removal or a reduction in the impact of existing structures and land uses that are detrimental to the visual quality of the landscape
 - b) Enhance public access and recreation opportunities without detriment to the landscape or wildlife
 - c) Contribute to the delivery of Green Infrastructure
 - d) Contribute to the measures identified in the Hertfordshire Landscape Strategy to strengthen, reinforce, safeguard, manage, improve, restore and reconstruct landscapes.
- 3) When considering proposals for development which may affect the management of an area or particular feature of the landscape, details of management proposals to protect and enhance the contribution of the site to the wider landscape will be required.

Reasoned Justification

10.4 Areas of Outstanding National Beauty (AONB), as they have been known since their inception in 1949, have been elevated to National Landscapes to place them alongside their larger and more well-known counterpart National Parks, to highlight their equal place in the country's aims around health, wellbeing, sustainable public access, climate change and nature recovery.

10.5 New development should conserve and enhance the special character and natural beauty of the National Landscapes. Proposals should also protect the setting of the National Landscapes and safeguard views into and out of the area. The areas of the District within the Chilterns National Landscape are shown on the proposals map.

10.6 Hertfordshire County Council's Landscape Character Assessment identifies three landscape regions in Three Rivers (shown on the proposals map)

- The Chilterns Landscape Region (including parts of the Chilterns National Landscape)
- The Central River Valleys Landscape Region
- The South Hertfordshire Plateau

10.7 These landscape regions contain a variety of landscape character areas for which assessments have been produced identifying key characteristics and influences. A Landscape Strategy has been produced which includes suggestions for managing future change. Further details can be obtained from:

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/landscape/landscape-character-assessment.aspx>

10.8 The Council will seek to ensure that development complements the surrounding local landscape of Three Rivers as identified in the current Local Character Assessments, through siting, layout, design, appearance and landscaping of development. When preparing applications consideration should be given to:

- The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change
- The pattern of woodlands, fields, hedgerows, trees, waterbodies, walls and other features
- The topography of the area.

10.9 Applicants are encouraged to refer to the Landscape Character Assessments for information in relation to these matters and the Council's Trees and Landscape Strategy.

10.10 For developments in or near the Chilterns National Landscape, the Council will have regard to the Chilterns Buildings Design Guide and Supplementary Technical Notes on Chilterns building materials (flint, brick and roofing materials). These provide further information on acceptable design in the Chilterns National Landscape, the issues facing the area and the management actions required. These are available from:

<https://www.chilterns.org.uk/visit-chilterns/shop-chilterns/books-guides/>

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APPENDIX 11 - ADVERTISEMENTS

Advertisements

- 1) The display of advertisements must not compromise amenity and highway safety. Highways England should be consulted on applications for advertisements close to the Strategic Road Network.
- 2) Advertisements will only be permitted if the character or setting of an area or building would not be unduly affected due to inappropriate size, design, colour, or materials; taking into account cumulative impacts.
- 3) Advertisements must not contribute to excessive light pollution from flashing or illumination with impact on passers-by, highway users, nearby residential or wildlife habitats.
- 4) Advertisements should generally be located within the curtilage of the premises to which they relate or at the site access.
- 5) Advertisements must:
 - a) Be high quality in terms of visual appearance, and should not have flashing internal or external illumination;
 - b) Be sited to prevent visual intrusion by virtue of light pollution into adjoining sensitive land uses, including residential properties and wildlife habitats;
 - c) Not restrict pedestrian movements;
 - d) Contribute to a safe and attractive environment;
 - e) Not contribute to proliferation/clutter of signage in the vicinity; and
 - f) Respect local context, including listed buildings, Conservation Areas and other heritage assets

Reasoned Justification

11.1 The term 'advertisement' covers a very wide range of advertisements and signs, including hoardings, illumination of hoardings, illuminated fascia signs, free-standing display panels, and estate agent boards. Not all advertisements are regulated by the Council and others benefit from deemed consent, which means that permission is not needed; this will depend on the size, position and illumination of the advert.

11.2 The type of illuminated signs should be sympathetic to the design of the building on which it is located. The method of illumination (internal, external, lettering, neon etc) should be determined by the design of the building. Flashing illuminated signs should be avoided, whether internal or external.

11.3 The quality and character of places can be affected where advertisements are poorly sited or designed and where consent is required, the Council can have regard to considerations of amenity and public safety, as well as the Control of Advertisements Regulations. The nature of material advertised is not a planning matter.

Appendix 12 – Deliveries, Servicing and Construction

12.1 In addition to the specific requirements around the management of waste, arrangements for deliveries and servicing and for the management of construction can have a significant impact on the environment, both on a development site and in the surrounding area. Managing these impacts is important for the quality of life of communities and the amenity of the area.

Deliveries, Servicing and Construction	
Deliveries and Servicing	
1)	All development proposals must consider arrangements for deliveries and servicing and demonstrate that adequate provision can be made for future occupiers. Where possible, delivery and servicing arrangements should be accommodated off-street and the use of delivery and servicing bays should be strictly controlled.
2)	In all cases there should be no adverse impacts of deliveries or servicing on the amenity of local residents and businesses including from vehicle noise or the size of vehicles.
3)	Proposals for development should demonstrate that delivery, servicing and emergency vehicles are able to enter and exit the site in forward gear and that the proposed arrangements will be safe and will not cause traffic obstruction or nuisance.
4)	Applications for major developments must demonstrate suitable provision for refuse and recycling collection, including details of storage and collection points and locations for vehicles to turn and wait.
5)	Delivery and Servicing Plans (DSPs) will be required for developments that by virtue of likely vehicle movements may impact on the operation of the public highway, private roads, the public realm and/or on the amenity of residents and businesses. The DSP should demonstrate how any potential impacts will be mitigated, and should seek to encourage use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips.
6)	Development proposals located close to Strategic Road Networks (SRNs) should be consulted with Highways England. Construction Management Plans (CMPs) will be required for development sites positioned close to SRNs, or which would place a sizeable amount of construction vehicles on the SRNs, any impacts arising from any

disruptions during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.

Construction

- 7) Developments should adhere to best practice construction techniques to limit impacts on the environment, reduce noise and vibration from construction, and manage the transportation of construction waste and materials.

Reasoned Justification

12.2 Delivery and servicing arrangements can have significant impacts on the quality of the environment and living and working conditions of an area and must be considered as an important part of proposals for new development.

12.3 This includes ensuring that there is adequate space and access within a site to accommodate requirements for storage and collection of waste and deliveries as well as managing associated vehicle movements so that these do not result in harm to the amenity of the area or any neighbouring occupiers. Where possible, delivery and servicing arrangements should be accommodated off-street, and the use of delivery and servicing bays provided should be strictly controlled.

12.4 It is proposed that, where relevant, applications for development should include details of:

- Delivery hours;
- Delivery frequency;
- Location of service bays;
- Size of servicing vehicles;
- Operation of servicing bays including swept path analysis

12.5 To help manage impacts over the lifetime of a development, it is proposed that Delivery and Servicing Plans (DSP's) will be required for some larger developments to demonstrate how any potential impacts will be mitigated.