

LOCAL PLAN SUB-COMMITTEE

NOTICE AND AGENDA

For a meeting to be held on Tuesday, 25 November 2025 at 6.00 pm

Members of the Local Plan Sub-Committee:-

Councillors:

Stephen Giles-Medhurst OBE (Chair)
Oliver Cooper
Stephen Cox
Steve Drury
Vicky Edwards

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

*Joanne Wagstaffe, Chief Executive
Monday, 17 November 2025*

The Council welcomes contributions from members of the public on agenda items at Local Plan Sub-Committee meetings. Details of the procedure are provided below:

Members of the public are entitled to register and identify which item(s) they wish to speak on from the published agenda for the meeting. Those who wish to register to speak are asked to register on the night of the meeting from 5.30pm. Please note that contributions will be limited to one person speaking for and one against each item for not more than three minutes.

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.

1. Apologies for Absence

To receive any apologies for absence.

2. Minutes

(Pages 5 - 10)

To confirm, as a correct record, the minutes of the Local Plan Sub-Committee meeting held on 8 October 2025.

3. Notice of Urgent 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. Declarations of Interest

To receive any declarations of interest.

5. Local Plan: Amended draft policies for Regulation 19

(Pages 11 - 110)

This report seeks Member agreement of the amendments to the draft Local Plan policies consulted on during the Part 5 Regulation 18 consultation which took place in July and August this year. Additionally, this report seeks Member agreement for amendments to other policies consulted on during the Draft Local Plan Regulation 18 Part 1: Preferred Policy Options document. The amendments to the policies are detailed in red in the appendices to this report. The policies were amended in response to changes to national planning policy, evidence studies, comments received as part of the Regulation 18 consultation and consideration at Local Plan Sub-Committee meetings from 2022-2025.

Recommendation:

That the Local Plan Sub-Committee note the contents of this report, agree the amendments to policies detailed in red in the appendices to this report and then recommend the following updated policies to the Policy & Resources Committee:

Appendix 1 – Biodiversity

Appendix 2 – Chilterns Beechwoods Special Area of Conservation

Appendix 3 – Northwood Headquarters

Appendix 4 – Net Zero Operational Carbon in New Build Residential Development

Appendix 5 – Net Zero Operational Carbon in New Build Non-Residential Development

Appendix 6 – Climate-adapted Design and Construction

Appendix 7 – Embodied Carbon and Minimising Waste

Appendix 8 – Reducing Carbon Emissions in Existing Buildings

Appendix 9 – Affordable Housing

Appendix 10 – Housing Mix and Type

Appendix 11 – Green Belt

Appendix 12 – Parking

Appendix 13 – Parking Standards

6. Gypsy, Traveller and Travelling Showpeople Update

(Pages 111 - 186)

This report provides an overview of how the council can meet its identified need for gypsies, travellers and travelling showpeople. The report will provide policy context, review approaches of some neighbouring local authorities, discuss the findings of the Council's GTAA and explain some of the potential approaches that can be taken to meet the accommodation needs of gypsies, travellers and travelling

showpeople.

Recommendation:

That the Local Plan Sub-Committee:

- (i) notes the contents of this report; and
- (ii) agrees with officers' recommendation that the Council focusses on intensifying and expanding sites/yards where possible and allocates parts of strategic general needs housing sites to meet the remaining need.

7. Regulation 18 Part 5: Consultation Summary Report (Pages 187 - 222)

This report provides a summary of the Regulation 18 consultation on the Council's Newly Submitted Sites and New Policies (Part 5).

Recommendation:

That the Local Plan Sub-Committee notes the contents of the report.

8. Other Business - If approved under item 3 above

9. Exclusion of Press and Public

If the Sub-Committee wishes to consider the remaining items in private, it will be appropriate for a resolution to be passed in the following terms:-

"that under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting for the following item(s) of business on the grounds that it involves the likely disclosure of exempt information as defined under Paragraphs 1 to 7 of Schedule 12A to the Act. It has been decided by the Council that in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information."

10. Local Plan: Regulation 19 Recommended Sites (Pages 223 - 422)

This report and appendices set out the officer recommended sites to be included in the Regulation 19 Publication of the Local Plan.

Recommendation:

That the Local Plan Sub Committee:

- (i) notes the contents of this report;
- (ii) notes the contents of the presentation;
- (iii) considers the sites as set out in the presentation against the criteria set out in this report and presentation;
- (iv) recommends to Policy & Resources Committee the sites to be included in the Local Plan Regulation 19 Publication document;
- (v) agrees that public access to the report be denied until after Policy

and Resources Committee (26 January 2025);

- (vi) agrees that public access to the decision be denied until after Policy and Resources Committee (26 January 2025).

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



Three Rivers House
Northway
Rickmansworth
Herts WD3 1RL

Local Plan Sub-Committee MINUTES

**Of a meeting held in the Penn Chamber, Three Rivers House, Rickmansworth, on
Wednesday, 8 October 2025 from 7.00 - 9.11 pm**

Present: Councillors Stephen Giles-Medhurst OBE (Chair), Louise Price, Oliver Cooper, Steve Drury, Vicky Edwards, Philip Hearn, Stephen King, Chris Mitchell and Sarah Nelmes

Also in Attendance:

Councillor Narinder Sian and Jon Bishop (Three Rivers Joint Residents' Association)

Officers in Attendance:

Marko Kalik, Head of Planning Policy & Conservation
Emma Lund, Senior Committee Officer
Martin Ross, Principal Planning Policy Consultant

LPSC21/25 Apologies for Absence

There were no apologies for absence.

LPSC22/25 Minutes

The minutes of the Local Plan Sub-Committee meeting held on 9 September 2025 were confirmed as a correct record and signed by the Chair.

LPSC23/25 Notice of Urgent Business

There was none.

LPSC24/25 Declarations of Interest

There were none.

LPSC25/25 Local Plan: Green Belt Review

The Head of Planning Policy & Conservation presented a report which provided an overview of the 2025 Green Belt review, with a recommendation that it should be agreed for publication on the Council's evidence base page on the website.

In response to a point raised about the length of time taken to produce the review, the Head of Planning Policy & Conservation reported that an initial delay of a month had been incurred due to the methodology not having been published by government within the Planning Practice Guidance. There had also been a need for the consultants to meet with MHCLG to clarify how the new policy, which had not previously been part of Green Belt reviews, should be interpreted. The final report had been received in September and had been used since that time to inform other pieces of work.

The Head of Planning Policy & Conservation highlighted the key policy points arising from the review as: the expectation that housing need constitutes exceptional circumstances for Green Belt release unless this would fundamentally undermine the purposes of the remaining Green Belt; the introduction of Grey Belt; and the sequential test prioritizing development in previously developed land in the Green Belt, followed by Grey Belt, and finally undeveloped Green Belt.

The Head of Planning Policy & Conservation highlighted that the Grey Belt map identified strategic parcels with a view to assisting in the development of plan making proposals and decision making. However, a site could still be assessed as Grey Belt in an area which was not strategically defined as Grey Belt where there were relevant site-specific circumstances.

Jon Bishop of Three Rivers Joint Residents' Association spoke on agenda items 5, 6 and 7.

The Head of Planning Policy & Conservation responded to questions and provided clarifications. Points raised in debate included the following:

- The report considered only one of the factors used to define Grey Belt. A number of other factors (such as heritage, natural landscape or Sites of Special Scientific Interest) might prevent an area being designated as Grey Belt.
- As development occurred, some ratings may need to change.
- A Committee Member commented that the report appeared to have used the same language and tests for the purpose of identifying Grey Belt land as had been used in the Stage 2 Green Belt Study, rather than using the new tests in the Planning Practice Guidance which had been recently tested at appeal (for example in relation to openness and physical boundaries). It was considered that the reasons why the tests were considered to be aligned had not been fully explained. The Member expressed the view that this was not the correct approach and would constitute a risk to the plan at examination. Officers undertook to re-visit this with the consultants.
- The map showing the provisional Grey Belt in assessed Green Belt parcels at section 6.2 and the parcel IDs at Appendix 2 were considered to be not particularly helpful in enabling residents to identify exactly where they were situated. It was recommended that the locations of the parcels should be made as clear as possible when the document is published on the evidence pages. Officers confirmed that they were in possession of the associated overlay maps and intended to produce a more user-friendly map for the website.
- Whilst noting that there were further questions arising from the report, and clarifications were required from the consultants as outlined above, several Committee Members expressed concern with regards to any delay in publication. An alternative approach was considered of publishing the report, with additional information and clarifications from the consultants to be published separately at a later date. However, some Members considered that early publication offered no benefit, and recommended postponement until the information was complete.
- A Committee Member noted that there were also some minor language and typographical errors which required correction (such as references to Chorley Wood instead of Chorleywood) and recommended that additional detail is added at A.1.5 in relation to appeal decisions (particularly the Dacorum (Leighton Buzzard Road) and Data Centre appeals) and how these would support the Council's case in protecting the Green Belt.
- A Committee Member recommended that the consultants be asked to review the wording used in relation to the fundamentally important area north of Abbots Langley and the protection of Kings Langley.

- A Committee Member commented that there were a number of examples within the district where the M25 would not be considered to 'visually separate' parcels of land and recommended that further work was done in evidencing this within the report.

Given the points raised in debate, the Chair moved a revised recommendation that the Sub-Committee agrees to publish the Green Belt review on the Council's evidence base page on the website following further advice and clarification from the consultants on the points raised and any necessary updates to the report. The updated report to be circulated to Lead Members of each group prior to publication.

RESOLVED:

That the Sub-Committee agrees to publish the Green Belt review on the Council's evidence base page on the website following further advice and clarification from the consultants on the points raised and any necessary updates to the report. The updated report to be circulated to Lead Members of each group prior to publication.

LPSC26/25 Local Plan: Draft Settlement Appraisal

The Sub-Committee received a report which provided an overview of the draft 2025 Settlement Appraisal which had been prepared to assist in the formulation of the Local Plan.

The report was presented for noting at this stage, and Members were invited to submit any further comments or proposed corrections to officers separately in writing.

The Principal Planning Policy Consultant introduced the report, highlighting that a settlement appraisal had last been undertaken in 2010. Changes in the 2025 appraisal had included adding the hierarchy and revising the terminology in relation to the new NPPF to provide clarity for decision making in terms of the naming of settlement types.

The Principal Planning Policy Consultant outlined the methodology which had been used in scoring the sustainability assessments according to the criteria of facilities, railway services, bus services and road infrastructure. The most sustainable locations had been identified as Rickmansworth, Chorleywood, South Oxhey, Croxley Green, Leavesden and Garston. However, it was highlighted that the document was a work in progress and currently draft, and that scoring or thresholds for categories may be subject to change. There may also be a need to change some settlement boundaries. Additionally, only settlements as far down as considered to be Service Centres (Tier 3) had been assessed so far. All other settlements with 100 residents and above would be assessed in the near future. It was noted that the appraisal provided a high level overview of the sustainability of settlements in order to assist strategic planning: individual site assessments would consider the sustainability of individual development locations.

The Principal Planning Policy Consultant responded to questions and provided clarifications. Points raised in the debate included the following:

- Distance measurements were taken from the geographical centre and this may not be the same as what residents would consider to be the 'centre' in terms of where services were located. It was also measured by road, not 'as the crow flies'.
- A Committee Member commented that there was some inconsistency in the approach taken where schools were located in a neighbouring authority. This may also apply to some other services such as convenience stores.
- A Committee Member commented that it would be helpful to include some detail on how the settlement boundaries were defined.

- A Committee Member questioned the approach of treating all types of sports facilities in the same way because the amenity they provided could be very different (for example, a leisure centre might carry a greater weighting than a single tennis court).
- It was suggested that access to accident and emergency services might be added as a criteria for sustainability, as well as access to pubs and social clubs.
- A Committee Member commented that whilst road infrastructure may be available in a settlement, there may also be constraints to sustainability arising from issues such as congestion. Officers were asked to consider if there was another way to reflect accessibility to the road network, or to add supporting text to highlight issues. It was noted that individual site assessments would provide further detail on road accessibility.
- A Committee Member questioned why Northwood School was recorded as the secondary school for South Oxhey, given that The Grange Academy was closer and took more pupils from South Oxhey than Northwood.
- A Committee Member questioned whether cycle paths and footpaths should be included, and officers responded that work was already underway with a view to including these.
- A Committee Member suggested that it would be helpful to have greater transparency around how the geographical centres had been identified.
- Notwithstanding that the appraisal was draft and not yet completed, it was noted that there were a number of areas where Members' local knowledge could be helpful in identifying anomalies. It was recommended that the draft document and maps with draft amended boundaries (Chorleywood and Leavesden and Garston so far) be circulated to all Members for comments / amendments / updates with a deadline for responses and a reminder that the document was draft and therefore not for publication or wider circulation. It was also recommended that Members should be approached for any suggested changes to settlement boundary maps.

RESOLVED:

That the Local Plan Sub-Committee:

- (i) notes the draft Settlement Appraisal;
- (ii) requests that officers circulate the document to all Members and the Three Rivers Joint Residents' Association with a covering note asking for comments, a link to the overlay map layers, and a deadline for receipt of comments.

LPSC27/25 Local Plan Timetable Update

The Chair highlighted that no further Local Plan Sub-Committee meetings were currently scheduled. However, further evidence work would need to come to the Sub-Committee, including transport and sustainability assessments for individual sites, as well as updated policies and the final sites proposed for inclusion in the Local Plan. At least one further meeting would therefore be needed.

Two potential dates were proposed: Tuesday 25 November or Thursday 27 November (if the Audit Committee meeting scheduled for that date was cancelled). These dates had been selected to allow the maximum amount of time for production of the required information; however, it was likely that some information may still remain outstanding. It was possible (although officers considered it unlikely) that a proposal for a Regulation 19 Consultation could then go on to the December Full Council meeting; the fallback position would be for a special Council meeting to be held in January to agree the Regulation 19 publication of the plan. The

latest date for this would need to be 27 January in order to avoid the statutory consultation period falling within the pre-election period.

The Head of Planning Policy & Conservation reported that officers continued to push the Council's external consultants for the remaining evidence work to be completed as soon as possible. The Transport Assessment was currently considered to be the biggest risk to timescales; however, a work around had been discussed with the consultants with a view to mitigation.

Committee Members expressed a preference for the date of 27 November for the next meeting, which would also give officers the maximum amount of time to produce the reports. However, a meeting on that date was contingent on the cancellation of the Audit Committee meeting currently scheduled for the same date. The Chair pointed out that if business was not finished at that meeting a further meeting in the week of 1 December might be required to complete the business.

RESOLVED:

That the Local Plan Sub-Committee agrees that a further meeting should be held on either 25 or 27 November 2025, with a meeting to be held in the week of 1 December if required to complete the business. Whilst the intention is to bring the Regulation 19 proposal to the December Full Council meeting, if that is not possible then a Special Council meeting be held on 27 January 2026.

CHAIR

This page is intentionally left blank

Three Rivers District Council

Local Plan Sub-Committee Report

25 November 2025

LOCAL PLAN SUB COMMITTEE – 25th November 2025

PART I

LOCAL PLAN: Amended Draft Policies for Regulation 19 (DoF)

1 Summary

- 1.1 This report seeks Member agreement of the amendments to the draft Local Plan policies consulted on during the Part 5 Regulation 18 consultation which took place in July and August this year. Additionally, this report seeks Member agreement for amendments to other policies consulted on during the Draft Local Plan Regulation 18 Part 1: Preferred Policy Options document. The amendments to the policies are detailed in red in the appendices to this report. The policies were amended in response to changes to national planning policy, evidence studies, comments received as part of the Regulation 18 consultation and consideration at Local Plan Sub-Committee meetings from 2022-2025.

2 Details

- 2.1 The Part 5 Regulation 18 “Newly Submitted Sites and New Policies” consultation was consulted on from 16 July – 31 August 2025. Some of these policies have been updated following review of consultation responses and are proposed by officers for inclusion in the Regulation 19 Publication version of the Local Plan.
- 2.2 The Part 1 Regulation 18 “Preferred Policy Options” consultation was consulted on from 11 June – 20 August 2021. Following this round of Regulation 18 consultation the Local Plan Sub-Committee considered updates to the draft Local Plan policies from 2022-2025. 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. These policies have now been further updated to include Member comments from the most recent meetings and are proposed by officers for inclusion in the Regulation 19 Publication version of the Local Plan.
- 2.3 The draft policies can be viewed in the appendices to the report. It is important to note that the main changes made to the policies since Members last reviewed them are highlighted by red font and should be the basis of any discussion.

Policies Consulted on in the Part 5 Regulation 18 Consultation

Biodiversity

- 2.4 This policy was consulted on during the Part 5 Regulation 18 consultation in July-August 2025 as the standalone biodiversity policy was not consulted on during the Part 1 (Preferred Policy Options) Regulation 18 consultation in 2021, and since the 2021 consultation, there has been significant changes to biodiversity related legislation and national policy, including the implementation of BNG.
- 2.5 The policy had been to the Local Plan Sub-Committee on the 17th October 2024. Following this and prior to the Part 5 Regulation 18 consultation, the policy had been amended and agreed by Members at the Extraordinary Policy and Resources Committee on 23rd June 2025.

2.6 Following review of the comments provided during the Part 5 Regulation 18 consultation, the following changes have been made to the policy:

- Removal of last sentence of policy criterion 1, in line with comments from HCC Ecology
- Added greater clarification between BNG hierarchy and mitigation hierarchy
- Policy criterion 4 was amended in line with comments from HCC Ecology
- Requirement for swift bricks added
- Added BNG requirements for watercourse assessment in the reasoned justification
- Added “significantly” to policy paragraphs 8 and 9 relating to outweighing harm
- Reviewed wording of hierarchy in relation to BNG and protected sites and further explanation/clarity in the reasoned justification
- Added requirement for action plans where appropriate
- Added specific reference to species listed under Section 41 of the NERC ACT 2006 as a way to protect more vulnerable species
- Added a separate sentence on fragmentation separate to the paragraph on protected species and updated reasoned justification
- Amendments to reasoned justification

2.7 The Biodiversity policy can be seen at Appendix 1.

Chilterns Beechwoods Special Area of Conservation

2.8 This policy was consulted on during the Part 5 Regulation 18 consultation as the policy was not consulted on during the Part 1 (Preferred Policy Options) Regulation 18 consultation in 2021.

2.9 The policy had been to the Local Plan Sub-Committee on the 17th October 2024. Following this and prior to the Part 5 Regulation 18 consultation, the policy had been slightly amended and agreed by Members at the Extraordinary Policy and Resources Committee on 23rd June 2025.

2.10 Following review of the comments provided during the Part 5 Regulation 18 consultation, it was considered that it was not necessary to amend the policy.

2.11 The Chilterns Beechwoods Special Area of Conservation policy can be seen at Appendix 2.

Northwood Headquarters

2.12 This policy was consulted on during the Part 5 Regulation 18 consultation as the policy was not consulted on during the Part 1 (Preferred Policy Options) Regulation 18 consultation in 2021.

- 2.13 Following review of the comments provided during the Part 5 Regulation 18 consultation, it was considered that it was not necessary to amend the policy itself.
- 2.14 However, an introductory paragraph was added.
- 2.15 The Northwood Headquarters policy can be found at Appendix 3.

Net Zero Policies

- 2.16 The suite of Net Zero policies were consulted on during the Part 5 Regulation 18 consultation as the policies were not consulted on during the Part 1 (Preferred Policy Options) Regulation 18 consultation in 2021. The suite of Net Zero Policies include the following:

- Policy XA - Net Zero Operational Carbon in New Build Residential Development (Appendix 4)
- Policy XB - Net Zero Operational Carbon in New Build Non-Residential Development (Appendix 5)
- Policy XC - Climate-adapted Design and Construction (Appendix 6)
- Policy XD - Embodied Carbon and Minimising Waste (Appendix 7)
- Policy XE - Reducing Carbon Emissions in Existing Buildings (Appendix 8)

- 2.17 These policies were brought to the Local Plan Sub-Committee on 12th May 2025. Following the May Local Plan Sub-Committee and prior to the Part 5 Regulation 18 consultation, the policies had been amended in light of Member comments and agreed by Members at the Extraordinary Policy and Resources Committee on 23rd June 2025.

- 2.18 Following review of the comments provided during the Part 5 Regulation 18 consultation, the following changes have been made to the policies:

- Policy XA – Provided further clarity on the Solar PV offset price within the reasoned justification
- Policy XB – The reasoned justification was amended to clarify which buildings the policy relates to
- Policy XB – A section was added to explain the difference between regulated and unregulated energy consumption and to provide clarity to major infrastructure providers that process energy would be considered as “unregulated”.
- Policy XC- Added reference to grey water in policy criterion 3
- Policy XC – added reference to “lifetime” in policy criterion 5
- Policy XC – Strengthened policy criterion 10
- Policy XC – Added reference to BREEAM UKNCR in reasoned justification

- Policy XD – Further clarification was added to the reasoned justification about the requirements of D2.
- Policy XE – Reasoned Justification was amended to provide clarity regarding infrastructure development and requirements of E1.

2.19 The suite of Net Zero Policies can be found at Appendices 4-8.

Other Updates to Policies

Affordable Housing

2.20 Whilst this policy was not consulted on during the Part 5 Regulation 18 consultation, it was brought to the Local Plan Sub-Committee on 12th May 2025. At the May Local Plan Sub-Committee, Members suggested amendments to the policy. As such, the following amendments have been made:

- Addition of “at least” in policy criterion 1
- In the policy, transferred reference to M4(3) building regulations to the Housing Mix and type Policy
- Addition of requirement for a local connection to the respective village in terms of rural exceptions sites.
- Addition of local connection criteria to the policy for all forms of affordable housing except social and affordable rent. This also resulted in removal of sentence in the First Homes section specifically relating to local connection criteria.
- Updated reasoned justification to include more recent unaffordability justification
- Reference to First Homes in the reasoned justification was moved to “affordable home ownership” section and wording amended to reference the national standard criteria for First Homes.
- With regards to the local connection criteria, the following amendments have been made following review of the council’s emerging Housing Allocations Policy:
 - Strengthened local connection criteria to require residence in the district in 5 out of past 6 years (previously was 3 out of last 5 years) to match Housing Allocations policy.
 - Strengthened local connection criteria to require employment in the district for the past 12 months (previously 6 months)
 - Addition of “adult” in front of siblings
 - Addition of caring responsibilities as a criteria
 - Addition of exceptional circumstances to be assessed on a case-by-case basis
 - Addition of keyworkers

- A section on Armed Forces exemptions was added to reflect the emerging Housing Allocations policy.
- Addition of marketing requirements
- Addition of reference to future more detailed guidance

2.21 Officers investigated the possibility of using local connection criteria for all forms of affordable housing as requested by Members. However, following discussions with the housing department, it is not possible for the Local Plan to apply local connection criteria to social and affordable rent as these forms of affordable housing are allocated by the council's Housing Allocation Policy and may be subject to non-planning legislation or statutory requirements, for example relating to homelessness. As such, as set out above, local connection criteria are instead applied to all other forms of affordable housing.

2.22 The Affordable Housing policy can be found at Appendix 9.

Housing Mix and Type

2.23 Whilst this policy was not consulted on during the Part 5 Regulation 18 consultation, it was brought to the Local Plan Sub-Committee on 12th May 2025. At the May Local Plan Sub-Committee, Members suggested amendments to the policy. As such, the following amendments have been made:

- Strengthened policy criterion 2 and associated reasoned justification
- Addition of “affordable rent” to policy criterion 7(b)(i)
- Addition of requirement for 10% of all other forms of affordable housing meeting the Building Regulations M4(3) standard (policy criterion 7(b)(iii))
- In policy criterion 10, the word “only” was added in front of “be supported”
- Encouragement for applicants to provide the details of the housing mix at the outline application stage has been added to the reasoned justification.
- Amendments were made to the reasoned justification.

2.24 The Housing Mix and Type policy can be found at Appendix 10.

Green Belt

2.25 Whilst this policy was not consulted on during the Part 5 Regulation 18 consultation, it was brought to the Local Plan Sub-Committee on 17th October 2025. This policy was brought to Members prior to the update to the NPPF in December 2024. As such, the emerging Local Plan's Green Belt policy has been updated to reflect changes to national policy.

2.26 A summary of the changes can be seen below:

- Updates to the explanatory text to reflect the changes to national policy and refer to the ongoing Green Belt Review.

2.27 The Green Belt policy can be found at Appendix 11.

Parking

- 2.28 Whilst this policy was not consulted on during the Part 5 Regulation 18 consultation, it was brought to a previous Local Plan Sub-Committee. A summary of the changes can be seen below:

- Addition of introductory paragraphs
- Addition of policy criterion 2
- Strengthening of policy criterion 3

- 2.29 The Parking policy can be found at Appendix 12

Parking Standards Appendix

- 2.30 Whilst this policy appendix was not consulted on during the Part 5 Regulation 18 consultation, it was brought to a previous Local Plan Sub-Committee. A summary of the changes can be seen below:

- Addition of explanatory text throughout the document
- Updates to zone type parking thresholds
- Updates to C3 Parking Standards
- Updates to various EV standards

- 2.31 The Parking Standards Appendix can be found at Appendix 13

3 Policy/Budget Reference and Implications

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

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

- 3.2 None specific.

4 Recommendation

- 4.1 That the Local Plan Sub-Committee note the contents of this report, agree the amendments to policies detailed in red in the appendices to this report and then recommend the following updated policies to the Policy & Resources Committee:

- Appendix 1 – Biodiversity
- Appendix 2 – Chilterns Beechwoods Special Area of Conservation
- Appendix 3 – Northwood Headquarters
- Appendix 4 – Net Zero Operational Carbon in New Build Residential Development

- Appendix 5 – Net Zero Operational Carbon in New Build Non-Residential Development
- Appendix 6 – Climate-adapted Design and Construction
- Appendix 7 – Embodied Carbon and Minimising Waste
- Appendix 8 – Reducing Carbon Emissions in Existing Buildings
- Appendix 9 – Affordable Housing
- Appendix 10 – Housing Mix and Type
- Appendix 11 – Green Belt
- Appendix 12 – Parking
- Appendix 13 – Parking Standards

5 **Background Papers**

National Planning Policy Framework (2024)

Planning Practice Guidance (2024)

Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

6 **Appendices**

Appendix 1 – Biodiversity

Appendix 2 – Chilterns Beechwoods Special Area of Conservation

Appendix 3 – Northwood Headquarters

Appendix 4 – Net Zero Operational Carbon in New Build Residential Development

Appendix 5 – Net Zero Operational Carbon in New Build Non-Residential Development

Appendix 6 – Climate-adapted Design and Construction

Appendix 7 – Embodied Carbon and Minimising Waste

Appendix 8 – Reducing Carbon Emissions in Existing Buildings

Appendix 9 – Affordable Housing

Appendix 10 – Housing Mix and Type

Appendix 11 – Green Belt

Appendix 12 – Parking

Appendix 13 – Parking Standards

Report prepared by: Aaron Roberts, Senior Planning Officer

This page is intentionally left blank

Appendix 1 - Biodiversity

- 1.1. Biodiversity is in decline across England, which is one of the most nature-depleted countries on Earth, something which Three Rivers has not escaped. This, and growing public awareness of this biodiversity emergency was recognised by the Government's 2023 Environmental Improvement Plan which stated:

There is a "... clear, scientific case and growing public demand for a step change in environment protection and recovery."

- 1.2. Whilst much legislation and Government policy that informed the last Local Plan remains valid, other components have evolved, and new laws and guidance created to provide local authorities with the best chance of playing their part in reversing this decline. In terms of legislation, for instance, local authorities now, importantly, have a duty to 'conserve and enhance' (instead of simply 'to have regard to') biodiversity when exercising its functions, a consequence brought about by the Environment Act 2021. Additionally, the terms 'nature recovery' and 'Biodiversity Net Gain' have become embedded in the scientific and public vocabulary, both of which have significant planning implications.
- 1.3. In this context, the primary drivers now influencing the conservation and recovery of nature in Three Rivers include but are not limited to those set out below:
- The Wildlife and Countryside Act 1981 (as amended)
 - Circular 06/2005 Biodiversity and Geological Conservation
 - NERC 2006
 - The Habitats Regulations 2017 (as amended)
 - The Environment Act 2021
 - [The Environmental Improvement Plan](#) (2023)
 - [National Planning Policy Framework](#) (2024) and associated [Planning Practice Guidance](#)
 - [The Environmental Principles policy statement](#) (2023)

Together, these bring forward a range of aspirational, policy or mandatory requirements which combine to frame the local plan's policies.

- 1.4. National policy states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity. The National Planning Policy Framework requires local authorities to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; and promote the conservation, restoration and enhancement of important habitats and species. Further, it requires that appropriate weight is given not only to protected sites but also to protected features of biodiversity and geological interest in the wider environment.
- 1.5. In terms of the Local Plan, these drivers can be taken to act together to ensure that local authorities conserve and enhance nature in part by establishing Local Plan policies that ensure that harm to biodiversity within protected sites and, beyond these boundaries, the habitats and species distributed across the rural and built environments is firstly avoided, secondly that harmful impacts are mitigated before they arise, and only as a last resort, that effective compensation is secured for any unavoidable damage that cannot be mitigated. This is the

Appendix 1 - Biodiversity

'*mitigation hierarchy*' and its use should be evident both in terms of the allocation of development opportunities and subsequent development proposals. Depending on circumstances, each of the three stages can be heavily influenced by differing legislation, policy and best practice guidance and should not be treated lightly.

- 1.6. More specifically, the Environment Act (2021) promotes positive actions such as the establishment of a Local Nature Recovery Strategy (LNRS), which will aim to increase the quality and size of existing protected areas, buffer harmful impacts from outside and link these together by creating new wildlife sites as stepping-stones or direct physical connections. In turn, the Hertfordshire LNRS will contribute to the national Nature Recovery Network (NRN) to begin to deliver the aspirations of the Lawton Report for a network that comprises a '*more, bigger, better, better joined*' biodiversity resource (which in turn can help deliver other societal benefits).
- 1.7. Biodiversity is an integral part of the character of Three Rivers and contributes to the high quality of life in the area. The district supports a variety of wildlife in habitats as diverse as wetlands, woodlands, grasslands, orchards, heathlands and urban gardens. Conserving and enhancing the diversity of wildlife and habitats in Three Rivers is a strategic objective.
- 1.8. Further, biodiversity provides numerous benefits, or ecosystem services, for people, such as flood attenuation, softening extremes of temperature and weather, recreation, wellbeing, pollinators and carbon sequestration. Nature conservation and its recovery are therefore not only required but highly desirable.
- 1.9. In these and other ways, the new local plan has a wide remit to take positive steps towards achieving the '*step change*' demanded by the Environmental Improvement Plan and provide the framework by which Government expects it will achieve commitments made in the 25-year Environment Plan.

Biodiversity	
<u>Biodiversity Net Gain (BNG)</u>	
1)	All qualifying development must deliver at least 10% measurable biodiversity net gain from the existing baseline value of a site through the use of DEFRA's statutory biodiversity metric. Development should apply the mitigation hierarchy to minimise or mitigate harmful effects on biodiversity.
2)	Biodiversity net gain should be delivered using the following biodiversity net gain hierarchy: <ol style="list-style-type: none">1. On-site2. A mixture of on and off-site3. Off-site4. Purchase of statutory biodiversity credits
On-site biodiversity net gain should be prioritised and undertaken wherever possible. Off-site measures will only be considered where it can be demonstrated that, after	

Appendix 1 - Biodiversity

following the **biodiversity net gain** hierarchy, all reasonable opportunities to achieve measurable net gains on-site have been exhausted or where greater gains can be delivered off-site where the improvements can be demonstrated to be deliverable and are consistent with the Local Nature Recovery Strategy. As a last resort and following the submission of robust and justified evidence that on-site or off-site biodiversity provision will not achieve 10% biodiversity net gain, the Council will consider allowing the developer to purchase statutory biodiversity credits as an alternative approach.

- 3) Biodiversity Gain Plans will be required to demonstrate how BNG will be achieved. This will apply to on-site and / or off-site BNG requirements. Consequently, where it is not possible to avoid or mitigate any or all impacts on site, the Biodiversity Gain Plan should also demonstrate and confirm how any off-site measures proposed will enhance local and nationally important biodiversity priorities.
- 4) To ensure the long-term net gain, all development proposals **delivering a significant onsite enhancement or off-site enhancement** should prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years.
- 5) Biodiversity net gain will be secured by condition, conservation covenant, and/or legal agreement, including a requirement to cover the Council's costs associated with the long-term BNG monitoring.
- 6) Where possible, the Council will encourage the delivery of greater than 10% biodiversity net gain.

Protection and Enhancement of Biodiversity

- 7) The weight given to the protection of protected sites will be commensurate with their position in the hierarchy:
 1. International
 2. National
 3. Local
 4. Irreplaceable habitats
- 8) Proposals that are likely to have, directly or indirectly, an adverse impact on protected sites will not normally be permitted except where the public benefits of development in that location clearly **and significantly** outweigh both the impact on the site and the wider network.
- 9) Proposals resulting in, directly or indirectly, the loss or significant harm to a Local Wildlife Site will normally only be permitted if it can be demonstrated there is a need for the development in that specific location and the benefit of the development clearly **and significantly** outweighs the loss or harm.
- 10) Proposals resulting in directly or indirectly, in the loss or significant harm of an irreplaceable habitat will normally be refused.
- 11) In all cases, the mitigation hierarchy should be used to first avoid, then mitigate and, where necessary and possible, compensate for the loss of biodiversity, and evidence provided to show how this has been followed. Where loss or harm to a European or other designated site cannot be avoided or mitigated, as a last resort, effective compensation must be secured and delivered.

Appendix 1 - Biodiversity

- 12) Proposals should further the aims and objectives of the Local Nature Recovery Strategy including via the delivery of biodiversity net gain where applicable.
- 13) Proposals must not result in the fragmentation or further fragmentation of wildlife habitats and should link or reconnect fragmented wildlife habitats where possible.
- 14) Proposals should seek to conserve, restore and enhance **statutorily** protected species **and those listed under Section 41 of the NERC Act 2006**, not addressed by “Biodiversity Net Gain” and reduce fragmentation by enhancing the connectivity of their populations and supporting habitats, and promote the functionality of other green **and blue** infrastructure. It is expected that applicants submit a proportionate and up-to-date ecological survey and assessment where it is likely that a proposal may impact upon a **statutorily protected species or a species listed under Section 41 of the NERC Act 2006 or their habitats**, and where appropriate action plans detailing how the habitat of those species will be protected to ensure that there will be no negative impact on the population of the species.
- 15) All new housing developments must provide on average at least one swift brick per dwelling across the development. All new proposals for non-residential buildings must include a proportionate number of swift bricks appropriate to the scale and use of the building.

Reasoned Justification

Biodiversity Net Gain

- 1.10. Biodiversity net gain aims to leave the natural environment in a measurably better state than it was beforehand. The Environment Act (2021) requires that all applicable development shall deliver a net gain of at least 10% against the ecological baseline. Net gain is not intended to facilitate the unnecessary loss of valuable habitats, and all proposals are expected to follow the mitigation hierarchy and the measures required to deliver a net gain go beyond those required to mitigate or compensate any harm after following the mitigation hierarchy.
- 1.11. Net gain is measured using Defra’s Statutory Biodiversity Metric, which quantifies the value of biodiversity in terms of the habitats present and those proposed to be created and/or enhanced. A simplified version (the Small Sites Metric) may be used for sites proposing fewer than ten dwellings on land of less than one hectare. Exemptions for small self-build development exist which fulfil other requirements. Successful applicants will also be required to provide a Biodiversity Gain Plan to be approved in writing by the Council prior to commencement of development.
- 1.12. The creation or enhancement of features to achieve the net gain can be delivered on-site, off-site (or a combination of the two) or, as a last resort, via the purchase of statutory biodiversity credits. On-site solutions are preferred. Off-site solutions should be located in proximity to the development site where possible, **should be** within Three Rivers **(unless strong and justified evidence suggests this is not possible)** and ideally contribute to the functioning of the emerging LNRS or other green infrastructure networks within the district. All will be secured for a period of at least 30 years via planning conditions, legal agreements and conservation covenants as appropriate.

Appendix 1 - Biodiversity

- 1.13. Applicants are reminded that if the site boundary includes land within 10m of a watercourse, the adjacent lengths of watercourse should be included within the watercourse baseline assessment in the Metric. Unless an exemption applies, applicants would need to deliver a minimum 10% net gain in watercourse number biodiversity units.
- 1.14. Whilst it is acknowledged that this is not a statutory requirement, applicants are encouraged where possible to deliver greater than 10% biodiversity net gain which will further the aims of BNG to leave the natural environment in a measurably better state after development than before.

Protection and Enhancement of Biodiversity

- 1.15. Despite the widespread decline in nature, Three Rivers retains a valuable biodiversity resource albeit fragmented by built development, infrastructure and intensive agriculture. These range from sites of national to local importance, although all will be afforded protection either in law, policy or best practice, but to differing degrees.
- 1.16. The relative importance of these is typically presented as the following hierarchy:
1. Designated (or Protected¹) sites and species
 2. Irreplaceable habitats
 3. Habitats and species of principal importance

Whilst each is described below, there is considerable overlap on the ground with certain features or sites frequently arising in all three categories.

The range of protected sites are shown below in descending importance:

Internationally important sites (Statutory)	Special Areas of Conservation (SAC) Special Protection Areas (SPA) Ramsar sites
Nationally important sites (Statutory)	Sites of Special Scientific Interest (SSSI) National Nature Reserves (NNR)
Locally important sites	Local Nature Reserves (LNR) (Statutory) Local Wildlife Sites (LWS) (Non-statutory) Local Geological Sites (LGS) (Non-statutory)

- 1.17. SACs and SPAs are afforded the highest levels of protection via the Habitats Directive (transposed into UK law by the Habitats Regulations 2017 (as amended)), with Ramsar sites enjoying similar protections though only in national policy. SSSIs, NNRs and LNRs are protected by domestic legislation and LWS and LGS are locally identified. Whilst the levels of protection therefore differ, these are set out in the NPPF, and local plans are expected to reflect this.
- 1.18. Irreplaceable habitats are listed in and protected by the biodiversity net gain legislation as examples of England's most ecologically valuable features that are very difficult to restore, recreate or replace. They include but are not limited to ancient woodlands, ancient and veteran

¹ Although a frequently used term not all are formally 'designated' and it is better to consider these as 'protected' sites (a term that will be used throughout this chapter).

Appendix 1 - Biodiversity

trees and lowland fens. Whilst examples frequently comprise part of a protected site they also frequently occur beyond these boundaries and can be distributed across the rural and built environments.

- 1.19. Ancient woodland is also given additional protection from [Government's standing advice](#) which only allows its loss where 'wholly exceptional reasons' apply and where a suitable compensation strategy is in place.
- 1.20. Habitats and Species of Principal Importance are defined and listed in s41 of the NERC Act 2006 and represent those features of particular importance for the overall purpose of conserving biodiversity. The list of 56 habitats and 943 species features was carried forward from the UK's Biodiversity Action Plan (BAP), itself a response to the Convention on Biological Diversity in Rio in 1992 but has been adapted, accordingly, along the way.
- 1.21. However, levels of protection can vary widely with some species - for instance great crested newts and all bats - afforded additional protection by the Habitats Regulations, a consequence of their status as 'European species'.

Biodiversity in Three Rivers

- 1.22. Though there are no internationally important protected sites within Three Rivers, it does support a range of other protected sites ranging from nationally designated SSSIs to local identified LNRs and LWSs. These include:

Special Areas of Conservation:

- None within the district (although parts of the district fall within the zone of influence of the Chiltern Beechwoods Special Areas of Conservation)

Sites of Special Scientific Interest:

- Frogmore Meadows
- Sarratt Bottom
- Croxley Common Moor
- Whippendell Woods
- Westwood Quarry

Local Nature Reserves at:

- Oxhey Woods
- Stockers Lake
- The Withey Beds
- Croxley Common Moor
- Prestwick Road Meadows
- Chorleywood House Estate
- Rickmansworth Aquadrome
- Chorleywood Common
- Batchworth Heath

Appendix 1 - Biodiversity

There are also 139 Local Wildlife Sites located at least partially within the district, part of a county-wide network of almost 2,000 sites that seeks to maintain key components of the county's biodiversity resource.

- 1.23. However, HMWT's [State of Nature Report](#) (2020) identified that in the last 50 years, 76 species had become extinct in the county and, of the species assessed, 20% (or 1,524) of those remaining were identified as being of conservation concern and less than 12% of LWS within Hertfordshire were under beneficial management.
- 1.24. Although destined to be superseded by the LNRS in 2025, the Hertfordshire Biodiversity Action Plan (BAP): A 50-Year Vision for the wildlife and natural habitats of Hertfordshire (2006) remains relevant and identifies three key biodiversity areas in Three Rivers:
 - Mid-Colne Valley - wetlands (gravel pits) and grassland
 - Whippendell Woods and surrounds - woodlands, grasslands and wetland
 - River Chess Valley - river, wetlands, grasslands, woodland and heathland
- 1.25. It is considered likely (although not guaranteed) that these areas will also be highlighted in the emerging LNRS as priority areas for conserving the existing biodiversity resource and the best opportunities for establishing areas of new, high-quality habitats. Consequently, the Council will be likely to refuse applications that have harmful impacts on biodiversity or compromise the effectiveness of the LNRS. In contrast, developments that avoid harmful impacts and make a positive contribution to the aims of the LNRS will be supported.
- 1.26. Developers should have regard to the potential impact of development proposals on biodiversity, including, for instance, trees, watercourses and woodlands from the outset. Applications should be accompanied by sufficient information to assess the impact of the proposed development on any protected species, trees, watercourses, woodlands or priority habitats. Where not exempt from BNG, there must also be acceptable baseline habitat surveys or assessments to properly inform subsequent BNG calculations using the Statutory or Small Sites Metric (as of 2025). Where it is considered that a habitat/species protected under European or domestic statutory legislation could be affected by development, the Council will require adequate survey information to be submitted at the time of the application together with an assessment of the potential impacts and appropriate mitigation/compensatory measures, these should be integrated into schemes and shown on submitted plans. The surveys should be undertaken and carried out by competent persons and at appropriate times of the year. Surveys and assessments should all follow established CIEEM best practice.
- 1.27. In accordance with national policy on biodiversity and geology the Council will conserve and, where possible, enhance:
 - Sites of Special Scientific Interest
 - Local Nature Reserves
 - Local Wildlife Sites
 - Protected Species
 - Trees and Ancient Woodlands, and

Appendix 1 - Biodiversity

- Geological and physiographical features.

1.28. When considering development proposals, the Council will take full account of contemporary and rapidly emerging legislation, policy and guidance and other relevant information to:

- Assess the importance of a habitats and species
- Consider the potential impact of development
- Identify ways to conserve and enhance biodiversity in Three Rivers
- Improve connectivity between habitats through establishment and expansion of the LNRS and Green Infrastructure corridors.

1.29. The Council will support measures identified in management plans (including the Thames River Basin Management Plan) and related status reports for Sites of Special Scientific Interest, Local Nature Reserves and other wildlife sites that seek to conserve, enhance and restore biodiversity. Where subject to BNG, developers will be required to contribute to improvements in biodiversity as part of their proposals in addition to providing compensation for impacts on protected species, under licence where necessary.

1.30. It's important that development does not fragment wildlife habitat because fragmentation breaks large, connected ecosystems into isolated patches. This makes it harder for animals to find food, migrate, repopulate, and increases the risk of local extinctions. Connected habitats support healthier ecosystems, greater biodiversity, and more resilient wildlife populations.

Swift Bricks

1.31. The NPPF specifically refers to swifts when setting out that planning policies should contribute and enhance the natural and local environment, including incorporating features which support priority species. The use of swift bricks is particularly important because swifts rely on urban cavities for nesting. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.

Green and Blue Infrastructure

1.32. In a wider context, biodiversity also represents a key element of Green Infrastructure (networks of green spaces and natural elements including open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage, heritage assets, earth science interests and open countryside). The Green and Blue Infrastructure Policy identifies key assets for Green and Blue Infrastructure and the existing and potential linkages. It also sets out policy to seek a net gain in the quality and quantity of Green and Blue Infrastructure through the protection and enhancement of assets and the provision of new green spaces.

This page is intentionally left blank

- 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.

Chilterns Beechwoods Special Area of Conservation (SAC)
<p>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 applies to proposals which are within the zone of influence of the Chiltern Beechwoods Special Area of Conservation (SAC) and which would result in a net increase of 100 units or more.</p> <p>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).</p>

Reasoned Justification

- 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 report¹ 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.
- 1.5. 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;

¹ Visitor survey, recreation impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-recreation-evidence-base-200322.pdf?sfvrsn=fbe079e_0

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.

1.1 Northwood Headquarters is a major military command centre, serving as both a national and NATO operational headquarters. It is the UK's principal military headquarters site, home to 5 Operational Headquarters. The site was rebuilt between 2006-2011, resulting in a purpose-built Headquarter site for 2,000 personnel.

Reasoned Justification

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 the effect can be suitably mitigated against or it can be demonstrated that there is no longer a defence or military need for the site.

1.2 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.

1.3 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.

This page is intentionally left blank

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

- 1.1. Operational carbon is an area where policy can ensure the provision of buildings that are fit for the future, both in terms of reduced energy consumption and holistic integration of design decisions that address climate adaptation. It is essential that housing developers prioritise these metrics and subsequent total energy consumption to best ensure that any on-site renewable energy can feasibly match total regulated energy use. If the energy use of a residential building is not mitigated in the first instance, on site renewable energy generation will likely not be sufficient to deliver a net zero building.

Policy X A - Net Zero Operational Carbon in New Build Residential Development

All new build dwellings (use class C3 and C4) are required to meet the following requirements:

A1.1 - Part L% improvement

- 1) At least a 63% improvement (reduction) on Part L 2021 TER (Target Emissions Rate) from energy efficiency measures.
- 2) Heat pumps are to be calculated as an energy efficiency measure, rather than a renewable energy measure.
- 3) As a measure in aid of this TER target, achieve an improvement (reduction) on Part L 2021 TFEE (Target Fabric Energy Efficiency) as follows:

End terrace: at least a 12% improvement

Mid terrace: at least a 16% improvement

Semi-detached: at least a 15% improvement

Detached: at least a 17% improvement

Bungalow: at least a 19% improvement

Flats/ apartments: at least a 24% (weighted average, whole block) improvement

All of the above should be calculated using SAP10.2 or later version, or the Home Energy Model (HEM, once it has been implemented)

In the event national building regulations exceed the requirements of this policy, the national standards (i.e. the higher standards) would apply.

A1.2 - Energy metrics guidelines

Or –

- 4) Positive weight will be given to development proposals which can demonstrate that the following absolute energy metrics are met:
 - Total energy use: 35 kWh/m²/year
 - Space heating demand: 15 kWh/m²/year
- 5) Performance against these targets must be evidenced using a methodology that accurately predicts buildings' operational energy use. Suitable methodologies include

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

the Passive House Planning Package (PHPP). Where a building achieves Passivhaus certification, it will be deemed to have complied with these targets.

A2 - No Fossil Fuels

- 6) The use of fossil fuels and connection to the gas grid will not be considered acceptable.

A3 - On site renewable energy

- 7) On-site annual renewable energy generation capacity (in kWh) at least equal to the predicted annual total regulated and unregulated energy use (residual energy use in kWh after A1.1 has been achieved, plus unregulated energy use).
- 8) Where an on-site net zero regulated and unregulated energy balance is not possible¹, it should be demonstrated that the amount of on-site renewable energy generation equates to at least 120kWh/m² projected building footprint/year.
- 9) Where a building in a multi-building development cannot individually achieve the requirements of A3 this shortfall is to be made up across other units on-site. Innovative solutions, for example utilising PV canopies on car parks or solar PV on communal buildings should be demonstrated before carbon offsetting A4 is considered.
- 10) Regulated and unregulated energy use can both be calculated with Part L SAP or BREDEM, but a more accurate method such as PHPP is advised. Any other proposed methods are subject to council confirmation of acceptability.
- 11) The annual renewable energy generation and the annual energy use are whole-building figures, not per-m² figures.
- 12) Renewable energy output should be calculated in line with MCS guidance for the relevant technology (expected to be PV in most cases).

A4 - Energy Offsetting

- 13) Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated and unregulated energy balance, should any shortfall in on-site renewable energy generation that does not match energy use be offset via a S106 financial contribution, reflecting the cost of the solar PV that will need to be delivered off-site.
- 14) The energy offset price shall be determined based on the cost of delivering equivalent off-site solar PV capacity, calculated using the most up-to-date government data on solar PV installation. The methodology will account for capital costs, expected local energy yield, and a reasonable allowance for the administration of the offset fund by the council or its delivery partners. The total offset contribution shall be calculated as a one-off payment, based on the projected annual shortfall in on-site renewable energy generation, multiplied by the published offset price.

A5 - Reduced Performance Gap

¹ Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output.

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

- 15) An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

A6 - Smart Energy Systems

- 16) Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site through energy storage or smart distribution, and overall minimising the need for wider grid infrastructure reinforcement.

A7 - Post-Occupancy Evaluation

- 17) Large-scale development (50 units or more) is to monitor and report total energy use and renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data is to be reported to the Local Planning Authority for 5 years upon occupation.

Reasoned Justification

- 1.2. As set out in the Climate Change Act 2008, national policy is working towards achieving the legally-binding UK target of net zero by 2050 and carbon budgets are subsequently legislated under the aegis of the act. These carbon budgets are linked to the Climate Change Committee's Balanced Pathway to Net Zero report, which is supported by analysis that sets out that all new buildings must be net zero by 2025. The 2050 net zero target is specifically referenced in the NPPF under paragraph 161.
- 1.3. The Planning and Energy Act 2008 sets out that local standards for energy efficiency in new homes are able to exceed those set in Building Regulations.
- 1.4. In the context of the 2023 Written Ministerial Statement, these policies are fully compliant with the perceived constraints it poses. The WMS only applies to energy efficiency standards where it states that any standards that exceed Building Regulations must be done so using the TER metric. Policy A1 remains within its bounds through the use of TER% reduction as the primary metric. The TFEE target is not additional to, but is a step towards, that TER target.
- 1.5. The 63% reduction target on Part L 2021 TER is set to align with national policy in that it is in line with the Future Homes Standard. Correspondingly, the TFEE target is set to align with the performance of a home that achieves that TER target via the indicative FHS specification set out by the Government in the 2019-21 FHS consultation. This is necessary in order to reduce the space heat demand (which is necessary for the achievement of the UK's carbon budgets). It is also necessary in order to protect the resident from excessive energy bills and potential fuel poverty, as the latest FHS consultation indicated that the FHS carbon target could be achieved just with a heat pump and no fabric improvements, resulting in heating bills approximately double those of a current new build home.

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

- 1.6. A2 is aligned to the Government's direction of travel indicated by both the options proposed in the Future Home Standard 2023 consultation, in that no fossil fuel heating systems are proposed. A3 and A4 are not impacted because they address renewable energy, which is out of scope of the 2023 WMS.
- 1.7. Policy elements A1, A2 and A3 are to be addressed at the design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. A5 and A7 compliance should also be demonstrated post-completion through planning condition.
- 1.8. A1 – A7 are to be demonstrated at the planning application stage through submission of an energy statement, which should include associated output reports from energy modelling software (e.g. SAP, BREDEM, PHPP, or HEM when available for general use).

Smart Energy Systems

- 1.9. In order to maximise energy self-sufficiency of a site, in relation to policy element A6, a number of methods may be considered. These may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.

The Non-Mandatory Energy Targets in Policy A 1.2

- 1.10. The achievement of the energy efficiency performance levels set out in Policy A1.2 will reduce the amount of solar PV required under A3 for an on-site net zero balance. This can save the applicant costs in renewable energy provision and/or energy offsetting.
- 1.11. Performance against these non-mandatory targets would need to be calculated using a method that accurately predicts energy use. SAP is not suitable for this due to its poor predictive accuracy in the context of high-performance buildings. PHPP (Passivhaus Planning Package) is a suitable methodology, as it is widely recognised for its precision in predicting energy performance, particularly for low-energy buildings. Unlike SAP, PHPP has a proven track record of providing accurate energy use and heating demand predictions, ensuring that the development can meet its energy efficiency targets and reduce operational energy consumption effectively.
- 1.12. The council may subsequently take a view on whether the incoming Home Energy Model (HEM) may be suitable, when HEM's final form is known.

No Fossil Fuels

- 1.13. The A2 No fossil fuels policy prohibits the use of fossil fuels within the operational phase of the development, specifically for energy purposes within the buildings, including heating, hot water, and electricity. The intent is to ensure that the development aligns with sustainability goals and supporting the transition to low-carbon energy sources. The restriction on fossil fuels does not apply to their use in construction activities or transport.

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

Steps to Calculating and Narrating Amount of Renewable Energy Provisions

1.14. Policy A3 should contain the following steps, to be expressed in an energy statement:

- First calculate the total predicted annual energy use in kWh for all proposed new buildings
- This can be modelled using SAP, BREDEM or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation. The council may later take a view on whether the incoming Home Energy Model (HEM) is a suitable method for energy use prediction when the final form of HEM is available.
- Then calculate the annual renewable energy generation for whole site in accordance with the MCS guidance for the relevant renewable energy technology. This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards Policy A1.
- Deduct the annual renewable generation from the annual energy use. The result should be zero or less.
- If the result is not zero or less, explore how to provide more on-site renewable energy.
- If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.
- Calculate the residual energy demand (whole building, not per m2) for all proposed new buildings are all measures proposed towards policies A1 and A3, then proceed to use this figure to calculate the required amount of offsetting provision in policy A4.

1.15. If a development cannot generate enough renewable energy on-site to balance the total regulated and unregulated energy use (as calculated after fabric efficiency improvements in Policy A1.1), the policy requires the renewable energy generation to meet a minimum of 120 kWh per square metre of projected building footprint per year.

1.16. Applicants should demonstrate compliance with this fallback target by providing a clear calculation of the renewable energy generated per square metre of the projected building footprint. This can be demonstrated in the Energy Statement by:

- Renewable energy system design, such as PV layouts, system capacities, and expected energy outputs.
- Calculation of the renewable energy generated based on these designs, ensuring it meets or exceeds the 120 kWh/m2 threshold for the total projected building footprint.

1.17. If the 120 kWh/m² target cannot be met, the applicant must provide evidence explaining why, even with renewable energy provision up to the equivalent of 70% of the projected building footprint (including roof overhangs), it is unfeasible to meet this threshold. This should include details on the constraints (e.g., site limitations, technical or financial barriers).

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

If Applicants Cannot Meet Policies A1.1 and A3

1.18. If the requirements of Policy A1.1 (fabric efficiency) and Policy A3 (on-site renewable energy) cannot be met, applicants must demonstrate compliance through the energy hierarchy:

- Fabric efficiency: The first step is reducing energy demand through fabric efficiency measures (e.g., insulation, airtightness, efficient windows). If these measures can't be met due to technical or site-specific constraints, applicants should provide clear evidence (e.g., feasibility studies or cost analyses) to justify why.
- Renewable energy: After addressing fabric efficiency, applicants must meet energy needs through on-site renewable energy generation. If fabric efficiency measures cannot be fully met, applicants can look to increase renewable energy provision, but they must still comply with overarching policy objectives.
- Submission requirements: Applicants should submit an energy statement that includes:
 - Predicted energy demand (kWh/year).
 - Proposed renewable energy contributions (e.g., PV output in kWh/year).
 - The percentage of energy demand met by on-site renewables.
 - Evidence of site-specific constraints preventing full compliance.

The Offsetting Calculation

1.19. The offset is a one-off payment, calculated by multiplying the annual shortfall in on-site renewable energy generation (in kWh) by the energy offset price (£/kWh). This represents the upfront cost of installing the equivalent renewable energy capacity that the developer has not provided on-site. Since it's a one-time contribution to cover this capital cost, it only reflects one year's shortfall – there's no need to factor in the building's lifetime or ongoing energy use.

1.20. The current offset price (£2.31/kWh) is based on the national cost of solar PV deployment as published by the Department for Energy Security and Net Zero (DESNZ). This price reflects the average cost of delivering solar PV (including installation), adjusted to include inflation and a 10% uplift to support fund administration and delivery of offset projects. The council may revise the offset price annually to reflect updated DESNZ cost data **and factor wider environmental requirements into the delivery model as necessary.**

1.21. Flexibility in applying the offsetting requirement may be considered where it is robustly demonstrated that full offsetting would make social or affordable housing unviable due to site-specific costs that exceed assumptions in the Whole Plan Viability Assessment. In these cases, the council may consider:

- Reducing the scope of energy to be offset, or
- Applying a discounted offset price where the council is confident it can still deliver the equivalent renewable generation on a case-by-case basis.

Assured Performance Methods

1.22. These are processes to follow throughout design, construction, commissioning and building handover that reduce the energy performance gap (the gap between predicted energy use and actual energy use). These not only help keep the building's actual carbon emissions to a minimum (as opposed to their predicted emissions using inaccurate methods like SAP), but

Appendix 4 - Policy X A - Net Zero Operational Carbon in New Build Residential Development

they also help to ensure occupant satisfaction. Suitable methods include (BSRIA Soft Landings, NEF/GHA Assured Performance Process, and Passivhaus certification. Alternative processes proposed by the applicant will be subject to consideration by the council about their evidence-based merits.

Applicability to Outline Applications

- 1.23. Compliance with the policies will be conditioned at outline stage and must be confirmed in detailed reserved matters. However, the council accepts that the degree of detail provided in the outline energy strategy will be less than for full and reserved matters applications. It is also recognised that this means the outline energy calculations may be largely based on assumptions. The aim should be to demonstrate that options have been identified by which the development could comply with the policy targets, taking into account the broad mix of anticipated floorspace, typologies and site conditions. Statements made about estimated carbon and energy performance based on a high degree of assumptions at outline stage should be reassessed at detailed reserved matters, albeit the reserved matters may diverge in how the required compliant performance will be achieved.
- 1.24. Where more detail is known, it should be reflected in the outline application; for example if expecting to connect to a site-specific low-carbon energy source. For a further example, if expecting a limited number of repeated home types, then the energy modelling would ideally reflect similar archetypes and identify a specification by which they could meet the policy targets for energy efficiency and renewable energy (taking into account site conditions). The modelled homes could reflect, for example, a sample of a relevant housebuilder's 'products' most likely to be built on site. This exercise benefits the developer in that it gives an early understanding of the degree of amendment needed to their existing regular specifications, allowing them to set up supply chains and economies of scale well in advance of commencing on site, as outline proposals typically are large-scale and take several years from outline application, to detailed design, to commencement.
- 1.25. Outline applications' estimated offsetting contribution should be stated in the outline Energy Assessment. These will be subject to a Section 106 agreement, but not paid at the time of the outline application. In that case the offset contribution must be recalculated within the subsequent reserved matters application, and paid on or prior to commencement of works on site for the reserved matters scheme. The reason for payment into the offset fund prior to commencement of works is so that the offset fund administrators are able to deliver the offset projects on a timescale not too dissimilar from the timescale for completion and occupation of the development. The aim is to enable, wherever possible, the offsetting project to be producing renewable energy no later than the development's occupants begin to place their demands on the grid.

This page is intentionally left blank

Appendix 5 - Policy X B - Net Zero Operational Carbon in New Build Non-Residential Development

- 1.1. As per Policy XA (residential), planning policies supporting net zero operational carbon in new build non-residential developments can drive significant improvements in energy efficiency and the reduction of regulated operational carbon in new buildings. This is in line with the council's commitment to becoming a carbon-neutral district by 2045 and national policy targets to the UK as a whole, becoming carbon-neutral by 2050.

Policy X B - Net Zero Operational Carbon in New Build Non-Residential Development

All new build non-residential development is required to be net zero carbon in operation (regulated energy) through the following requirements:

B1.1 - Part L% improvement

- 1) % improvement on Part L 2021 TER (Target Emissions Rate), or equivalent reduction on future Part L updates through on-site measures as follows:

Offices: at least 25% improvement

Schools: at least 35% improvement

Industrial buildings: at least 45% improvement

Hotels (C2, C5) and residential institutions (C2, C2a): at least 10% improvement

Other non-residential buildings: at least 35% improvement

In the event national building regulations exceed the requirements of this policy, the national standards (i.e. the higher standards) would apply.

B1.2 - Energy metrics guidelines

- 2) Positive weight will be given to development proposals which can demonstrate the following absolute energy metrics:

- Total energy use: 65 kWh/m²/year
- Space heating demand: 15 kWh/m²/year

- 3) Employing absolute energy metrics reduces the amount of solar PV required under B3 for an on-site net zero balance of regulated energy. Applicable methodologies to calculate this include CIBSETM54 and the Passivhaus Planning Package. At present, the Part L calculation method (SBEM) is not considered suitable as it does not provide accurate predictions of a building's actual energy use.

B2 - No fossil fuels

- 4) The use of fossil fuels and connection to the gas grid will not be considered acceptable.

B3 - On-site renewable energy

- 5) On-site annual renewable energy generation capacity to at least equal predicted annual total regulated energy use (residual energy use after B1.1 has been achieved). In buildings subject to Part L's requirement for energy forecasting, that forecasting should be the source of the 'annual total regulated energy' figure.

Appendix 5 - Policy X B - Net Zero Operational Carbon in New Build Non-Residential Development

- 6) Where an on-site net zero regulated energy balance is not possible¹, it should be demonstrated that the amount of on-site renewable energy generation equates to $\geq 120\text{kWh/m}^2$ projected building footprint/year.
- 7) Where a building in a multi-building development cannot individually achieve the requirements of B3, this shortfall is to be made up across other units on-site before carbon offsetting is considered.
- 8) Development should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual buildings), such as solar PV canopies on car parks, have been explored.

B4 - Energy offsetting

- 9) Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated energy balance, any shortfall in on-site renewable energy generation that does not match regulated energy use is to be offset via a S106 financial contribution, reflecting the cost of the solar PV that will need to be delivered off-site.
- 10) The energy offset price shall be determined based on the cost of delivering equivalent off-site solar PV capacity, calculated using the most up-to-date government data on solar PV installation. The methodology will account for capital costs, expected local energy yield, and a reasonable allowance for the administration of the offset fund by the council or its delivery partners. The total offset contribution shall be calculated as a one-off payment, based on the projected annual shortfall in on-site renewable energy generation, multiplied by the published offset price.

B5 - Reduced Performance Gap

- 11) An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

B6 – Smart Energy Systems

- 12) Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site through energy storage or smart distribution and overall minimising the need for wider grid infrastructure reinforcement.
- 13) This may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.
- 14) Large-scale development (over 5000m^2 of floorspace) is to monitor and report total energy use and renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data is to be reported to the Local Planning Authority for 5 years upon occupation.

¹ Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output.

--

Reasoned Justification

- 1.2. As per the Climate Change Act 2008, national policy is working towards achieving the legally binding UK target of net zero by 2050 and carbon budgets are subsequently legislated under the aegis of the act. These carbon budgets are linked to the Climate Change Committee's Balanced Pathway to Net Zero in the Sixth Carbon Budget Report, which sets out that all new buildings should be zero carbon from 2025, with high levels of energy efficiency and low-carbon heat. It is also found that non-residential buildings should phase out high-carbon fossil fuel boilers no later than 2026 and phase out gas boilers in 2030-33. Furthermore, the 2050 net zero target is now specifically referenced in the NPPF under paragraph 161.
- 1.3. Therefore, new buildings today should not have these, to avoid the need for expensive disruptive retrofit less than 10 years after completion which would also waste embodied carbon. The policy supports these targets by prohibiting fossil fuel connection and improving energy efficiency, which mandate a heating technology similarly efficient to a heat pump. **The policy relates to all new build non-residential development required to meet building regulations.**
- 1.4. The policy remains consistent with the 2023 Written Ministerial Statement's stipulations, given that the metric for B1 is a % reduction on TER (to be calculated with SBEM, which is the non-residential equivalent of SAP).
- 1.5. B2 is aligned to the Government's direction of travel indicated by both the options proposed in the Future Homes Standard 2023 consultation, in that no fossil fuel heating systems are proposed. B3 and B4 are not impacted because they address renewable energy, which is out of the scope of the 2023 WMS.
- 1.6. Policy elements B1, B2 and B3 are to be addressed at the design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. B5 and B7 compliance should also be demonstrated post-completion through planning conditions.
- 1.7. B1 to B7 are to be demonstrated at the planning application stage through the submission of an energy statement, alongside associated output reports from energy modelling software (e.g. SBEM).

Smart Energy Systems

- 1.8. In order to maximise energy self-sufficiency of a site, in relation to policy element A6, a number of methods may be considered. These may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.

Compliance with Policy B1.1 TER Reductions

- 1.9. These %TER reduction targets are not limited to be solely delivered through energy efficiency measures. Therefore, there could be an element of clean energy supply or renewable energy

Appendix 5 - Policy X B - Net Zero Operational Carbon in New Build Non-Residential Development

measures included in these. Further renewable energy will be needed to subsequently meet the requirements of Policy B3, therefore applicants should be advised to pursue energy efficiency measures as far as feasible in the first instance in pursuit of Policy B1.1, so that the subsequent Policy B3 renewable energy requirements are not rendered excessively expensive or unfeasible. Designing to use less energy in the first place reduces the amount of renewable energy needed to match this, and/or the amount of carbon offset payment needed.

- 1.10. In the current Part L for non-domestic buildings, the type of heating system in the 'notional' building (from which the TER is derived) is the same as the type of heating system in the actual proposed building. Therefore, no TER gains will be made by switching from a gas or oil boiler to a heat pump or other all-electric or otherwise low-carbon heat system. However, TER improvements can be made by selecting a heating system that is more efficient than Part L 2021's notional efficiency for that heating type.

Assured Performance Processes for Energy Performance

- 1.11. Regarding assured performance processes, in addition to those mentioned in relation to the equivalent residential policy (A5) in residential, there is also one additional method for non-residential: NABERS UK (administered by CIBSE). NABERS is currently only available for offices but intended to extend to other building types in future.

Offsetting

- 1.12. The requirement for offsetting may be applied flexibly where it is demonstrated that this makes development unviable due to the unique energy use profile of the proposed building and site characteristics, where this results in an offsetting cost uplift significantly higher than assessed in the Whole Plan Viability Assessment. The flexibility could include a reduction in the scope of energy that has to be offset, or a discounted price per kWh if the Local Authority is confident that it can still deliver the required offset projects within this price (when pooled into the offsetting fund which will primarily consist of full price offset contributions). The degree of flexibility will depend on the unique scheme characteristics and evidence submitted to the local authority about what could be viably accommodated. It may also depend on the degree to which the proposed development represents a socially desirable facility that meets unmet community needs (such as for healthcare, education or similar).
- 1.13. See also the reasoned justification for the equivalent residential policies (A1-A7) regarding:

- Calculating renewable energy provision and offset payments,
- Applicability to outline applications, and
- Assured performance processes

Regulated vs Unregulated Energy

- 1.14. Regulated energy is building energy consumption resulting from the specification of controlled, fixed building serviced and fittings such as space heating and cooling, ventilation, pumps and lighting. Such energy uses are an inherent part of building design.

Appendix 5 - Policy X B - Net Zero Operational Carbon in New Build Non-Residential Development

- 1.15. Unregulated energy is building energy consumption resulting from a process or source which is not “controlled”, primarily energy consumption from systems in the building which Building Regulations do not impose requirements or targets. Examples include energy consumption from systems such as IT equipment, lifts, external lighting, printers, photocopiers and other appliances. Some buildings can have a high percentage of unregulated energy consumption, levels of which can vary significantly depending on occupants and use. Compared to regulated energy, unregulated energy is harder to consider and limit during the design process.
- 1.16. Policy Criterion 5 (B3) requires renewable energy generation to be equal to the annual total regulated energy, and not ‘process energy’ (which may result from large infrastructure sites), which would be deemed non-regulated energy for the building or operation.

This page is intentionally left blank

- 1.1. Adapting to and mitigating against the effects of climate change is crucial, particularly as climate change impacts worsen with more extreme and variable temperatures and weather. The need for climate-adapted design and construction for new development is key for current and future occupant comfort and safety, as well as making the built environment more resilient and future-proofed.

Policy X C - Climate-adapted Design and Construction

- 1) All development should mitigate against climate change and adapt to climate change by employing sustainable design and construction principles.
- 2) Applicants are expected to demonstrate that the following elements have been considered, and evidenced where appropriate by the corresponding assessment methodology, in an Energy and Sustainability Statement.

C1 - BREEAM

- 3) New non-residential developments with over 1000sqm of floorspace should achieve the BREEAM 'Excellent' certification, including full water credits for category Wat 01 (water efficiency). **Where this is demonstrated as being unfeasible or unviable, developers should demonstrate that greywater/rainwater systems have been utilised to the best of their ability, and sanitaryware flow rates have been reduced as far as possible.**

C2 - Sustainable construction

- 4) All new build developments must minimise their carbon footprint and energy impact through sustainable design and construction practices. Proposals should demonstrate efforts to reduce greenhouse gas emissions by considering factors such as site location, building orientation, design, landscaping, and planting strategies, while prioritising a "fabric-first" approach.
- 5) **Now and for their lifetime**, all developments should be designed to enhance resilience to the anticipated effects of climate change. Proposals must incorporate measures to adapt to changing climate conditions, including resilience to extreme weather events, rising temperatures, stronger winds, droughts, heavy rainfall, and snow. Water conservation and storage measures should also be integrated into designs, taking into account best practices and future climate projections.
- 6) All development should demonstrate consideration to reducing carbon emissions and waste through construction. Where development impacts existing buildings, proposals should also comply with Policy XE on 'Reducing Carbon Emissions in Existing Buildings'.

C3 - Cooling Hierarchy

- 7) All development proposals must show how designs have optimised the internal and solar heat gains to balance the need to minimise space heating demand with the need to passively maintain comfortable temperatures during hot summers. This should be shown by demonstrating that overheating risk measures have been incorporated in accordance with the cooling hierarchy which prioritises measures, as follows:
 - i. Minimise internal heat generation through energy-efficient design and equipment selection

- ii. Reduce and manage the amount of heat entering the building in summer using:
 - Building orientation
 - Shading
 - Albedo
 - Fenestration
 - Insulation
- iii. Manage heat within the building through exposed internal thermal mass and high ceilings
- iv. Passive ventilation, including cross ventilation through a building wherever possible. Passive stack and wind-driven ventilation, night purging and designing windows to allow effective and secure ventilation. Single aspect developments are discouraged
- v. Natural cooling measures including green and blue infrastructure
- vi. Use of mixed-mode cooling such as low-energy mechanical cooling (fan-powered ventilation)
- vii. Mechanical ventilation (which, if it has a heat recovery function, should also have a summer bypass mode)

C4 - Overheating assessment

- 8) All major residential developments should complete CIBSE TM59 overheating assessment (or future equivalent assessment methodology) as their route to compliance with Building Regulations Part O. The simplified Part O route will not be considered acceptable.
- 9) All major non-residential developments should complete *CIBSE TM52* overheating assessment (or future equivalent assessment methodology).

C5 - Resilience to Climate Change

- 10) All development must incorporate **proactive** measures that increase resilience to extreme weather events and a changing climate, **taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures**. All developments should:
 - Reduce the risk of flooding and conserve water
 - Employ sustainable urban drainage
- 11) Development proposals should reduce the 'heat island' effect through the use of cool materials and green and blue infrastructure within the development.

Reasoned Justification

- 1.2. The NPPF requires the planning system to take full account of the long-term implications of climate change including the risk of overheating and the need to mitigate and adapt to climate change. It also sets out that policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts.
- 1.3. This policy addresses the critical need to mitigate the risks associated with overheating and climate vulnerability. Without effective design, factors such as building orientation and glazing ratios could increase the risk of overheating. To respond to this, this policy includes sections

on the cooling hierarchy and overheating assessments, which ensure that new developments do not contribute to unacceptable levels of overheating risk. The cooling hierarchy prioritises passive design measures reduces the need for air conditioning and other energy-intensive systems, reducing cost, energy reliance and providing improved thermal comfort throughout the year.

- 1.4. This policy also recognises the increasing pressure on water resources. For non-residential buildings, water use limits aligned with BREEAM Wat 01 credits promote efficient water consumption.
- 1.5. The comprehensive approach to climate change adaption and mitigation set out in this policy not only reduces the likelihood of future retrofitting (which can be disruptive and costly) but also promotes future proofing of new developments, ensuring long-term sustainability and occupant well-being. The policy is also linked to other Local Plan policies through the integration of green and blue infrastructure as well as reducing flood risk by employing measures such as sustainable urban drainage.
- 1.6. To ensure that buildings are not at risk of overheating, applicants are required to demonstrate compliance with additional assessments beyond the standard requirements set by Building Regulations. C4 of the policy mandates that all major residential developments complete a CIBSE TM59 overheating assessment to assess and mitigate overheating risk, in addition to the basic compliance with Building Regulations Part O (or its future equivalent). For major non-residential developments, a CIBSE TM52 overheating assessment must be completed, or the future equivalent. These additional assessments go beyond the standard regulatory checks to ensure that the building design considers factors such as internal heat generation, ventilation, and shading to avoid uncomfortable indoor temperatures during hot summer months.
- 1.7. The Energy Statement should include the relevant overheating assessment reports, demonstrating that the design of the building effectively addresses overheating risk and includes measures to minimise it.
- 1.8. For BREEAM, applicants are expected to submit a BREEAM pre-assessment to demonstrate that the relevant BREEAM level has been designed into the scheme, and that more than the minimum WAT 01 credits (for the respective certification level targeted) will be achieved. **Residential developments which take account of and deliver upon the provisions of the BREEAM UKNCR and achieve higher ratings where feasible will be supported.** A condition upon any grant of planning permission is expected to ensure that the development is completed in accordance with the BREEAM pre-assessment and that the BREEAM certification is provided once the building is completed.
- 1.9. It is accepted that the level of detail provided by applicants may be lower for householder and minor applications, particularly in relation to the cooling hierarchy.
- 1.10. **The requirements of this policy would not generally be applicable to major infrastructure developments, for example for water and wastewater works, which are already subject to industry specific standards.**

- 1.1. Embodied carbon refers to the emissions associated with materials and construction processes throughout the whole lifecycle of a building or infrastructure. Embodied carbon is an important aspect to consider as it represents the total greenhouse gas emissions from the entire life cycle of a building's materials, ranging from extraction and manufacturing to transport, construction, maintenance and disposal.
- 1.2. The case for addressing embodied carbon is justified by the increasing proportional importance of these emissions as a share of buildings' total carbon footprint as the power grid is decarbonised and buildings become more energy efficient. Unlike operational carbon emissions, embodied carbon has front-loaded impacts as the carbon is released before a building is even first used or occupied. Additionally, once materials are made and installed their emissions are permanent, so it is important to consider embodied carbon at the earliest opportunity.

Policy X D - Embodied Carbon and Minimising Waste

Residential and non-residential buildings (thresholds given below) must meet the followings requirements:

D1 - Embodied Carbon Reporting

- 1) All major new residential (10 dwellings or more) and non-residential (1000m² of floorspace or more) developments are required to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance.

D2 - Limiting Embodied Carbon

- 2) All large-scale major development (50 dwellings or more; 5000m² or more of non-residential floorspace) is required to limit embodied carbon (RICS/BS 15978 modules A1-A5) to 600kgCO₂e/m² GIA.

D3 - Building End-of-Life

- 3) All new buildings should be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

D4 - Demolition Audits

- 4) All major development that contains existing buildings/structures to carry out a pre-development and/or pre-demolition audit, following a well-established industry best practice method (e.g BRE) in accordance with Policy XE4.

D5 - Embodied Carbon in Non-Major Development

- 5) Proposals for new development of 1 or more homes or more than 100m² of non-residential floorspace, but below the size thresholds for embodied carbon reporting and targets as noted above (set out in point 1), should include proportionate narrative on options considered (and where possible, decisions made) to minimise embodied carbon of the proposed development.

Reasoned Justification

- 1.3. Whilst there is no explicit reference to embodied carbon in the NPPF, the NPPF references to 'low carbon development' and 'low carbon economy' could readily include embodied carbon as an implicit part of this. The NPPF also sets out that the full range of potential climate change impacts should be taken into account when preparing and assessing planning applications. Additionally, embodied carbon can be considered as a design issue and therefore would fall under the NPPF's instruction that new development should be planned for in ways that help to reduce greenhouse gas emissions, such as through its design.
- 1.4. By addressing embodied carbon and promoting sustainable construction practices, this policy could deliver a range of co-benefits that extend beyond carbon reduction, supporting wider economic, environmental, and social goals. This policy seeks to ensure that carbon emissions are limited across the whole life cycle of a building. Without this policy, large amounts of carbon emissions could be missed, given that up to 50% of a building's lifetime carbon emissions result from upfront embodied carbon .
- 1.5. The requirement for whole-life carbon assessments under D1 ensures that all major developments assess and mitigate the full carbon impact of building materials and construction. By limiting embodied carbon in large-scale developments (e.g., to 600 kgCO₂e/m² GIA), D2 plays an important role in reducing the carbon impact of large-scale major construction. **Developers are expected to use RICS Whole Life Carbon Assessment guidance to demonstrate compliance, and site and project-specific factors can be taken into account. Where it is demonstrably unfeasible to achieve this limit (including the provision of strong and justified evidence) developments are expected to reduce embodied carbon to the lowest practicable level. The requirements of D2 would not generally be applicable to major infrastructure developments, for example for water and wastewater works.**
- 1.6. By promoting circular economy principles (particularly within D3 and D4) which focus on material reuse and the ease of disassembly at the end of a building's life, the policy encourages more resource-efficient construction, reducing waste generation and lowering costs of future demolition and disposal. Designing buildings for disassembly and material reuse helps reduce dependency on raw materials and limits costs related to sourcing and transporting new materials. By designing for disassembly and material re-use (D3), new buildings will be more adaptable and future-proofed, capable of being modified, extended, or dismantled with lower environmental impact. This leads to greater building longevity and flexibility, enabling spaces to evolve without the need for significant new construction.
- 1.7. The requirement for demolition audits under D4 ensures that before any building is demolished, the potential for reusing or recycling materials is thoroughly assessed. This reduces the amount of waste sent to landfill and encourages the repurposing of valuable construction materials.
- 1.8. The requirement to provide a narrative on embodied carbon for smaller developments (D5) encourages development of all scales to consider sustainable construction methods and communicate their choices to foster greater awareness and engagement with sustainable practices.

- 1.9. Compliance with D1, D2 and D3 are to be demonstrated within an energy statement. If applicable, output reports for D4 should be submitted alongside an energy statement.
- 1.10. With regards to D3, to ensure buildings can be adapted or dismantled at the end of their life, developers should focus on modular design using dry construction methods (e.g., bolts, screws) to enable easy disassembly. Avoiding permanent adhesives and welds allows materials to be reused or recycled efficiently. Material selection is also important. Low-embodied-carbon materials like timber or recycled steel are preferred for ease of reuse. Designs should prioritise durable, long-lasting materials and incorporate a reuse strategy for managing materials at the building's end of life, including deconstruction and sorting for recycling or reuse.
- 1.11. With regards to D5, it is recognised that the level of detail required will vary depending on the size and scale of the development. Applicants should provide a proportionate narrative in their energy statement, exploring how embodied carbon has been minimised. While detailed assessments are not required for smaller developments, the following considerations are encouraged:
- Incorporating and repurposing on-site materials or features where possible.
 - Designing with a focus on reducing material use, such as through space-efficient layouts or structural design.
 - Opting for materials with lower embodied carbon, such as timber, instead of higher-carbon materials like steel, aluminium, or conventional cement.
 - Reducing 'product miles' by sourcing materials closer to the site or from manufacturers with demonstrated low-carbon practices.
 - Implementing processes that reduce material wastage during construction
- 1.12. This approach ensures that applicants, even for smaller developments, are considering embodied carbon in a meaningful way, fostering sustainable practices without imposing excessive burdens on projects that do not meet the higher thresholds for formal reporting.

This page is intentionally left blank

- 1.1. Given that a third of the district's emissions arise from existing buildings, the decarbonisation of existing buildings is crucially important to the council. Whilst local planning policy has only a limited influence on the carbon and energy performance of existing buildings (as policy can only seek changes to buildings where the building owner is seeking to require a change to the building that requires planning permission), the retrofit of existing buildings can be pursued through providing a permissive and supportive policy approach to energy efficiency and carbon improvements to existing buildings.

Policy X E - Reducing Carbon Emissions in Existing Buildings

- 1) Development which would result in considerable improvements to the energy efficiency, carbon emissions and the general suitability and longevity of an existing building will generally be supported, with significant weight attributed to those benefits.

E1 - Prioritise Retrofit- First Principles

- 2) Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition.
- 3) Development involving existing buildings should demonstrate that a whole building approach and the following hierarchy has been considered:
 - a. Refurbishment and upgrading of existing building fabric including wall, roof and floor insulation, windows, doors and thermal bridging
 - b. Installation of low or zero-carbon heating and hot water systems, and the installation of renewable energy generation on-site
 - c. Connection to an existing or planned low carbon heat network
- 4) Where substantial or total demolition is proposed, a feasibility assessment should be submitted. The feasibility assessment should demonstrate:
 - a. The whole life carbon of a new building(s) would be less or similar to a suitably comparable retrofit option (as detailed in 3 a-c above)
 - b. The proposed development would deliver public benefits which would not be delivered by a suitably comparable retrofit option
 - c. The feasible reasons retrofit cannot be considered, including operational or structural requirements
- 5) Demolition of existing buildings will only be permitted where applicants can demonstrate that alternative development options have been comprehensively explored and following assessment by the Local Planning Authority, on balance, the whole life carbon of a new building(s) would be less or similar to a suitably comparable retrofit option, the proposed demolition of an existing building(s) secures benefits over and above retention, refurbishing and retrofitting an existing building(s) or is not feasible as set out in the feasibility assessment.

E2 - Embodied Carbon

- 6) For major developments involving substantial or total demolition of an existing building(s), applicants should submit a Whole Life Carbon Assessment in accordance with Policy D1.

E3 - Adapting Heritage Assets to Climate Change

- 7) Development which would result in considerable improvements to the energy efficiency, carbon emissions, resilience and longevity of designated (including within Conservation Areas) or non-designated heritage assets will be supported, providing that the significance of the asset is preserved.
- 8) A whole-building approach should guide interventions to upgrade historic buildings, and direct interventions, where they limit the impact to the significance of the historic buildings or their setting.
- 9) The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in designated and non-designated heritage assets will be encouraged, providing that the significance, character and appearance of the asset is preserved in a manner appropriate for their significance.

Reasoned Justification

- 1.2. The Climate Change Committee (an independent, statutory body in the UK that advises the government on climate change targets and progress in reducing emissions) has shown that in order for the UK to meet its legally binding carbon reduction goals, it is vital that the existing building stock must be decarbonised. Therefore, Local Plan policy which supports improving the efficiency of existing buildings, reducing the energy demand and carbon emissions of existing buildings aligns with local and national carbon targets (including the UK's legally mandated Carbon Budget).
- 1.3. The NPPF sets out that local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic. It further sets out that where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in the chapter of the framework relevant to conserving and enhancing the historic environment.
- 1.4. The hierarchical approach to retrofitting prioritises fabric upgrades and energy efficiency improvements before incorporating low- or zero-carbon heating, hot water systems, and renewable energy generation, aligns with Policy XA, offering potential benefits including reduced energy bills and longevity of buildings. This policy also closely correlates to Policy XD with regards to reducing embodied carbon and promoting circular economy principles.
- 1.5. This policy aims to ensure that retrofitting of historic buildings and heritage assets are undertaken in a sensitive manner, balancing the important notions of conserving and enhancing the historic environment and decarbonising existing buildings, leading to a more sustainable and resilient historic built environment.
- 1.6. Compliance with E1 should be demonstrated within the energy statement. It is accepted that the level of detail provided may be lower for householder and minor applications. However, where substantial or total demolition is proposed, applicants would still be expected to assess the embodied carbon of alternatives to demonstrate why this level of demolition would be

acceptable. It is recommended that applicants engage with the council early in the development process regarding feasibility assessments and alternative options. Additionally, with regards to applicants demonstrating that a whole building approach are recommended to utilise a nationally recommended recognised assurance scheme such as BSI PAS 2035. The demolition (to enable replacement infrastructure), or upgrades of essential infrastructure such as water and wastewater works would generally not be obligated to fulfil the requirements of E1 as it's acknowledged that replacement and upgrades to essential infrastructure is often driven by compliance, safety, or resilience needs.

- 1.7. If applicable, output reports for E2 should be submitted alongside an energy statement.
- 1.8. To support applicants in retrofitting existing buildings, various guidance is available including: [LETI Climate Emergency Retrofit Guide \(LETI, 2021\)](#), [Net Zero Carbon Toolkit \(Etude, Elementa, Passivhaus, Levitt Bernstein, 2021\)](#), and [Passivhaus Trust's Retrofit Primer \(2022\)](#).
- 1.9. In respect of historic buildings and heritage assets, guidance is available at [Historic England's Energy Efficiency and Retrofit Guidance](#).

This page is intentionally left blank

1.1 Delivery of affordable housing is a key priority of the Local Plan. Average house prices in Three Rivers are some of the highest in the country outside London. Housing affordability within the district continues to be a major concern for many residents, and many local people have difficulty in accessing housing on the open market. This particularly affects the young and those on lower incomes who are entering the housing market. The South-West Herts Local Housing Needs Assessment Update (LHNA, March 2024) is clear that there is a notable need for affordable housing in Three Rivers and across South-West Hertfordshire. Improving the supply and standard of affordable housing is therefore one of the biggest priorities for the council to address the needs of our community.

Affordable Housing	
Thresholds and Percentage	
(1)	The council will seek an overall provision of at least 40% of all new housing as affordable housing (by net additional unit), incorporating a mix of tenures. All new development resulting in a net gain of one or more dwellings will be expected to contribute to the provision of affordable housing. On specialist housing schemes for older people, these thresholds will apply except in the case of development falling within a C2 use class.
Split	
(2)	70% of affordable housing should be for rent and 30% for affordable home ownership and have regard to the following: <ul style="list-style-type: none"> a) Affordable housing for rent includes Social Rent and affordable rent (and can include affordable private rent). As a guide 70% of affordable housing for rent provision should be Social Rent and 30% should be for affordable rent. b) Affordable home ownership includes First Homes and shared ownership. First Homes and shared ownership products are preferred; however, other types of affordable home ownership products will be considered on a case-by-case basis. As a guide 50% of affordable home ownership provision should be First Homes and 50% should be shared ownership.
(3)	In calculating the percentage of affordable units to be provided as part of a development scheme, the affordable housing requirement will normally be 'rounded up' to the nearest whole number.
(4)	Where development would affect existing affordable dwellings, permission will only be granted where this would not result in a net loss of affordable housing, and where the proposed tenure mix would meet affordable housing needs of the community.
Green Belt	

- (5) All major development involving the provision of housing in the Green Belt (i.e. sites for 10 or more homes; or with a site area of 0.5 hectares or more) should provide at least 50% of the total housing provision as affordable housing, unless this would make the development of the site unviable (when tested in accordance with national planning practice guidance on viability). Any development in the Green Belt resulting in a net gain of 1-9 dwellings should provide at least 40% of the total housing provision as affordable housing, as set out in paragraph 1 of this policy.

Rural Exception Sites

- (6) Small-scale proposals delivering 100% affordable housing in perpetuity within and immediately adjacent to the village core areas of Bedmond and Sarratt may be supported within the Green Belt where these are evidenced to provide affordable housing to meet identified local community needs. **Such proposals must accommodate households which contain current residents or have an existing family or employment connection (to the respective village) in perpetuity.** A minor degree of market housing may be acceptable where it is required to support the delivery of affordable housing on the site.
- (7) Affordable housing should reflect the mix of sizes and types required in the district as identified within the Housing Mix and Type Policy and the most up-to-date Local Housing Need Assessment (LHNA) and subsequent updates, as well as the council's Housing Register.

Mode of Affordable Housing Provision

- (8) In most cases, affordable housing provision should be made on site, however, on small sites delivering between one and nine dwellings, contribution to affordable housing may be made through commuted payments. Such payments will be broadly equivalent in value to on-site provision of affordable housing for rent, but may vary depending on site circumstances and viability. Payments will fund the development of affordable housing on other sites within the district.
- (9) To ensure community cohesion and good design, affordable homes must be fully integrated in the design of the overall scheme, being physically and visually indistinguishable from market units and dispersed across the site in clusters appropriate to the size and scale of the development. Designs resulting in high maintenance or service charges should be avoided.

Delivery

- (10) Affordable housing requirements that have been determined on the basis of viability and site-specific viability information seeking to justify an alternative level or mix of affordable housing will therefore only be accepted in exceptional cases. Viability assessments should be undertaken in accordance with the recommended approach set out in national planning guidance, including standardised inputs, and will be made publicly available.
- (11) Where a reduction in affordable housing is justified, the council will seek to secure the preferred tenure split as a priority over a potentially higher total percentage of affordable housing which would not be consistent with meeting priority needs. Such proposals will also be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism.
- (12) Where developments would trigger affordable housing requirements, application of the Vacant Building Credit will only be appropriate in demonstrated exceptional circumstances, and where a proposal would meet all of the following criteria:
- a) It is clearly demonstrated that the site would otherwise not come forward for any form of redevelopment at any point over the medium to long-term;
 - b) All buildings within the site boundary are vacant at the time the application is submitted;
 - c) There are no extant or recently expired permissions on the site for any proposed use class;
 - d) The proposal does not involve the loss of any capacity to meet other development needs from a site allocated for non-housing development; and
 - e) The building has not been made vacant for the sole purpose of redevelopment, evidenced by provision of marketing and vacancy evidence for a continuous period of five years (up to the point of submission of an application).

Local Connection Criteria

- (13) All forms of affordable housing (except homes for social and affordable rent) should be allocated in accordance with the Council's 'Local Connection Criteria', set out below or by any subsequent detailed guidance. This will be secured by planning obligation.

First Homes

- (14) First Homes are required to be sold at a minimum discount of at least 30% of the market value of homes available for sale locally which are of the same size and type as those proposed. The minimum discount will be secured in perpetuity.

Reasoned Justification

1.2 The NPPF advises that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas where policies may set a lower threshold of five units or fewer. However, the local circumstances in Three Rivers are considered to justify an alternative approach to require all developments resulting in a net gain of housing to contribute to affordable housing provision. This is on the basis of the acute need for affordable housing in the district demonstrated by the LHNA, the council's "*Evidence Relating to the Application of the Affordable Housing Threshold in Core Strategy Policy CP4: Affordable Housing*" documents¹, and the crucial role that smaller sites delivering fewer than 10 dwellings has played in delivering housing historically which is expected to continue in future. These factors are considered to outweigh the guidance within the NPPF and justify the approach within the Affordable Housing Policy to require all sites resulting in a net gain of dwellings to contribute to affordable housing provision in the district, and this approach has been supported in recent appeal decisions in the district.

1.3 The LHNA demonstrates that the median house price in Three Rivers during in the year to September 2022 was £560,000. This is significantly above the Hertfordshire average of £512,940 and the East of England average of £328,000 during the same period. Monthly rents across all sizes of accommodation are similarly above Hertfordshire and England averages within Three Rivers.

1.4 Affordability ratios in Three Rivers and across the South-West Hertfordshire area have deteriorated significantly since 1997 and lower quartile house prices in the district were 12.24 times higher than lower quartile incomes in 2024. The affordability of housing therefore remains a critical issue in Three Rivers and will continue to be so for the foreseeable future.

1.5 The LHNA considered needs for affordable housing within the district and identified an annual net need for affordable housing in Three Rivers over the period 2024-2040 of 527 affordable homes per year. When split between rented affordable need and affordable home ownership need, this overall identified need of 527 affordable homes a year equates to a need of 364 rented affordable homes (including Social Rent and affordable rent) and 163 affordable home ownership dwellings (including First Homes, shared ownership etc).

1.6 Given the substantial need for affordable housing in the district, it is also essential that development does not lead to a reduction in the overall supply of affordable housing, or to changes to the tenure of affordable housing which is provided so that it is less well suited to meet demonstrated local needs. Such proposals would undermine the overall approach to the supply of affordable housing in the district and will be resisted.

Rented Affordable Need

1.7 The LHNA sets out that "there are therefore policy choices to be made by individual authorities around how policies are crafted ... the analysis is however clear that there is need for both social and affordable rented homes". The LHNA further adds that "decisions should be influenced by individual authorities' priorities, the results of viability evidence and funding availability". With regard to the tenure of affordable housing for rent, local evidence suggests that the greatest need in the district is for Social Rented housing, followed by Affordable Rent.

1.8 However, when benefits are taken into account, the LHNA notes that for households claiming Household Benefit, an affordable rent may be appropriate as long as the Housing Benefit is able to cover all of the rent, whilst for households with an income that would allow

¹ <https://www.threerivers.gov.uk/services/planning/planning-applications/latest-appeals-cp4>

them to afford an affordable rent it is arguable that a social rent would be more appropriate as the housing costs would be less of a strain on household finances.

1.9 Affordable rent should be genuinely affordable, with rents at around 60% of median market values (including service charges).

1.10 The council acknowledges that requiring a higher proportion of affordable homes for rent, will impact on the overall level of affordable housing that may be delivered. However, these are the most urgent and pressing needs for housing in the district and the council will therefore prioritise the delivery of a greater proportion of affordable housing for rent rather than a higher total level of affordable housing delivery through, for example, a higher proportion of affordable home ownership. A tenure mix in accordance with Policy X (Housing Mix and Type) will therefore be sought.

Affordable Home Ownership Need

1.11 The LHNA also indicates that in addition to the requirement for affordable housing for rent, that there is a case for setting out policies in Local Plans which support provision of a range of affordable home ownership products. Such products include First Homes, shared ownership and rent to buy.

1.12 First Homes are a specific type of discounted market sale housing and meets the definition of 'affordable housing' for planning purposes. First Homes are discounted market sale units which:

- a) must be discounted by a minimum of 30% against the market value;*
- b) are sold to a person or persons meeting the First Homes eligibility criteria*
- c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,*
- d) after the discount has been applied, the first sale must be at a price no higher than £250,000*

1.13 National standard criteria apply to First Homes eligibility and will be considered at the time of the planning application.

1.14 The council can exercise flexibility to lower the price cap; increase the discount level and/or reduce the income cap, provided there is local evidence to justify doing so. The LHNA suggests the possibility of raising the discount levels to 40% in Three Rivers, but the case for higher discounts needs to be balanced against scheme viability and the potential knock on effect on other tenure types in the scheme. As such, higher discounts can be considered, where this can be viably achieved.

Local Connection Criteria

1.15 To demonstrate a local connection, applicants for Affordable Housing (except social and affordable rent) that are built in Three Rivers will need to provide evidence for one of the following:

- Have current residence (by choice) in the district and **have lived in the district for at least five out of the last six years; or**
- Work in Three Rivers in employment other than of a casual nature as defined by Local Government Association Guidelines. For the purposes of this policy this will be

defined as having had permanent work with a minimum of a 16 hour contract per week for the previous **12 months**, and without a break in the period of employment for more than 3 months; or

- Have family connections in Three Rivers with a member of their household, parents, adult children or **adult** siblings who have been residents in the district for at least the last 5 years.
- **Have caring responsibilities to a family member within the district or are cared for by a family member within the district**
- **Are Keyworkers (definitions will be provided by future guidance)**

1.16 Other exceptional circumstances not listed above may be considered on a case-by-case basis.

1.17 In recognition of the unique nature of their circumstances, all Armed Forces veterans, irrespective the length of Service or when this Service ended are exempt from any local connection testing restrictions. This includes:

- **Current serving members of the Armed Forces;**
- **Former members of the Armed Forces;**
- **Bereaved spouses or civil partners of Armed Forces members where (i) the bereaved spouse or civil partner has recently ceased, or will cease, to be entitled to reside in Ministry of Defence accommodation following the death of their Service spouse or civil partner, and (ii) the death was wholly or partly attributable to their Service;**
- **Adult children of serving Armed Forces members who need to move out of family accommodation;**
- **Serving or former members of the Reserve Armed Forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their Service;**
- **A divorced or separated spouse or civil partner of a Regular Armed Forces member who needs to move out of accommodation provided by the Ministry of Defence due to a relationship breakdown.**

1.18 The above list is not exhaustive and the council may grant an exception to the local connection criteria on the grounds of exceptional circumstances, to an Armed Forces veteran or family member who may not wholly fulfil one of the above.

1.19 Applicants with a local connection will be expected to be prioritised for the first three months of marketing. Council officers will monitor compliance with requirements set out in a s106 and other planning obligations.

1.20 It must be noted that future detailed guidance will supersede the above criteria.

Rural Exception Sites

1.21 There are fewer opportunities to build new homes in the district's smaller villages surrounded by, or designated as Green Belt due to more restrictive policies on housing in countryside and particularly in the Green Belt. However, an element of new development can help to support these communities. The NPPF recognises this and enables the provision of limited affordable housing for local community needs under policies set out in the development plan, including policies for rural exception sites. Proposals for rural exception sites delivering 100% affordable housing within and immediately adjacent to the village core may be supported (including in the Green Belt) where these are evidenced to provide affordable housing which would meet identified local community needs. The type and size of

affordable housing provided on such sites must address identified needs in the individual village or the area it serves which is defined as the village or parish in which it is located.

Specialist Housing

1.22 In relation to specialist housing (such as extra care housing), it is recognised that provision of affordable housing may be particularly difficult to achieve from both a viability and practical perspective), as highlighted within the LHNA. As such, affordable housing provision will not apply in the case of development falling within a C2 use class. In other cases (i.e. where development falls within a C3 use class), a viability assessment will be required to demonstrate if an affordable housing contribution is not viable.

This page is intentionally left blank

Appendix 10 - Housing Mix and Type Policy

1.1 In addition to providing a significant increase in the quantum of new housing delivered, to meet future housing needs in Three Rivers it is important that new housing provides for a range of housing types and sizes. Providing a balance of housing will help meet the varied needs of the community and contribute to sustainability objectives.

1.2 Sustainable communities contain a mix of dwelling types, sizes and tenures as well as jobs and local services that make a neighbourhood successful and it is important that new housing is provided across all sectors of the housing market to meet a wide variety of household needs and add to the choice of housing available. New homes therefore need to comprise a mix of tenures and prices, sizes and types.

1.3 There is also an ageing population in the district, and it is important that new development includes specific forms of housing for older people, as well as specialist accommodation to meet needs.

Housing Mix and Type	
(1)	All new homes (both market and affordable and whether general needs or specialised) should contribute to the creation of balanced and sustainable communities by meeting identified local and district housing needs in terms of mix, size, tenure and type to cater for the full range of different households.
(2)	<p>In determining an appropriate housing mix, applications must be based upon the housing mix provided in the Development Plan (see below) and only varied from this where it can be clearly evidenced (by reference to a-g below) that an alternative mix would be significantly more appropriate. Such variation would be subject to review by elected Members before approval:</p> <ul style="list-style-type: none"> a) The range of housing need in terms of the size and type of dwellings as identified by the Local Housing Needs Assessment (LHNA) and subsequent updates; b) Detailed local housing market assessments (where relevant); c) Current and future demographic profiles and population; d) The characteristics of the site which may influence its ability to accommodate a mix of housing, including its size, location and constraints and opportunities for development; e) Evidence of local market signals, trends and circumstances; f) Information on past housing delivery; and g) For affordable housing, the council's Housing Register.
(3)	All large-scale major housing proposals delivering 100 dwellings or more (gross) should be accompanied by a strategy to ensure a diversity of housing on the site including differing types, sizes, styles, design and tenure mix as well as housing to meet the requirements of different groups (specialist and supported housing).
Specialised and Supported Accommodation	
(4)	The provision of well-designed specialist and/or supported accommodation will be supported in accordance with other policies in the Local Plan where:

- a) The type of specialised accommodation proposed would meet an identified need and contribute to maintaining a balance of housing stock;
 - b) The proposal is in a location with good access to services and facilities, including public transport, enabling residents to live independently as part of the community;
 - c) The design of the proposal, including any individual units of accommodation, is capable of meeting the specialised accommodation support and care needs of occupiers; and
 - d) Arrangements are in place to ensure the delivery of appropriate care and support packages where appropriate.
- (5) Specialist and support housing developments of 50 dwellings or more, should adhere to the design principles adopted in the Hertfordshire County Council's Adult Care Service (ACS).
- (6) Existing specialised or supporting housing should be retained where a need exists (and/or is projected to exist over the plan period) unless it is adequately replaced either on or off site by an equivalent quality and quantity of accommodation.

Accessible and Adaptable Dwellings

- (7) All housing should be designed and built to encourage sustainable and flexible living, and should be built to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development.
- a. All new dwellings should be comply with M4(2) standards of the Building Regulations as a minimum.
 - b. For major developments of 10 or more dwellings, the following proportions of dwellings should be built to be wheelchair adaptable/**accessible** and comply with M4(3) standards of the Building Regulations where:
 - i. 5% of market dwellings should be built to M4(3a) standards; and
 - ii. 10% of affordable dwellings for social **and affordable** rent should be built to M4(3b) standards.
 - iii. **10% of all other forms of affordable housing should meet the Building Regulations M4(3) standard**

Self-Build and Custom House Building

- (8) Proposals for self-build and custom housebuilding will be supported where development would have no adverse effect on the local character. Strategic sites of at least 500 dwellings will be expected to provide 2% of serviced plots for self-build and custom build where possible.
- (9) Schemes including self-build plots should consider the sizes of plots identified as required on the Self Build register and should be made available and priced and marketed appropriately as self-build or custom build plots for at least 12 months.

Houses in Multiple Occupation

- (10) Proposals for Houses in Multiple Occupation (HMOs) that require planning permission will **only** be supported where the balance of housing types and character of the immediate locality would not be adversely affected; where suitable living conditions would be created; and where there would be sufficient provision of amenity space.

Reasoned Justification

1.4 The Local Housing Needs Assessment (LHNA) (March 2024) has been prepared to provide an up-to-date evidence base on overall housing needs in South-West Hertfordshire, the needs for specific types and size of homes, and the housing needs of specific groups within the population of demand from specific housing market segments.

1.5 The LHNA provides information on the current and future housing needs of the district and found that:

- Population projections (2016 based) indicate a projected population growth in Three Rivers of 9,459 people 2020 – 2036, a 9.9% increase. However, the 2018 projections show a very small increase in population, less than 1%
- When linked to the standard methodology housing OAN, the Three Rivers population is projected to increase by 18,294 people 2020 – 2036, a 19.3% increase and therefore some net in-migration would be expected.
- The largest growth in population is expected from people aged 65 and over, with this group expected to increase by 4.6% in the period 2020 – 2036 based on 2018 population projections
- There is a need to increase the supply of accessible and adaptable housing and wheelchair user dwellings as well as specific housing for older people.

1.6 The LHNA reveals different profiles in the size mix across the different tenures, with social and affordable rented housing being more heavily skewed towards smaller homes, market housing being more heavily skewed towards larger homes, and affordable home ownership housing sitting between the two.

1.7 While the LHNA provides estimated housing requirements, it recognises there are a range of factors that need to be taken into account in setting policies for provision. The LHNA's housing mix is based on a trend based analysis and does not take into account deficiencies in existing stock. The council has therefore taken into consideration the housing completions over the period from 2005 until 2025 against the housing mix set out in the Core Strategy (2011). This shows a significant under delivery of smaller homes and a significant over delivery of larger homes. As such the housing mix in the LHNA has been adjusted to take this into consideration.

1.8 Other factors such as the need for homes older persons to downsize to and extensions that have led to properties moving up a level in the mix have also been factored into these adjustments. The Social/Affordable Rented housing mix has not been adjusted as the LHNA mix is considered to meet the district's needs for affordable housing.

1.9 The following table sets the required Strategic mix of housing provision which will be obligatory until any subsequent revision to the LHNA (2024) and council's evidence and should form the basis for the housing mix of development proposals and provision across the district.

	1-bedroom	2-bedroom	3-bedroom	4+-bedroom
Market Housing	15%	35%	40%	10%
Affordable Home Ownership	20%	40%	30%	10%
Social/Affordable Rented Housing	20%	40%	35%	5%

1.10 However, it is recognised that the mix may need to be adjusted for specific schemes to take account of market information, housing needs and preferences, the council's Housing Register, households whom the council owe the full housing duty and specific site factors. Where adjustment to the proportions is sought, applications should explain how relevant factors have contributed to the mix of housing being proposed. **With regards to outline applications, applicants are encouraged to provide details of the housing mix at the outline application stage wherever possible.**

1.11 With regards to the affordable sector, the LHNA notes that there are typically issues around demand for and turnover of 1-bedroom homes (as well as allocations to older person households) which provide limited flexibility for households and as a result these can see relatively high levels of turnover. Therefore, it may not be appropriate to provide as much 1-bedroom stock as is suggested by the modelling exercise. In addition, the stock of 4-bedroom affordable housing is very limited and tends to have a very low turnover. As a result, whilst the number of households coming forward for 4+-bedroom homes is typically quite small, the ability for these needs to be met is even more limited. The LHNA therefore advises that the proportion of 1-bedroom affordable homes is reduced with a commensurate increase in 4+-bedroom homes.

1.12 Within the strategic housing mix, the council will support provision of bungalows as an element of the overall supply as it is recognised that these may be particularly attractive to older owner-occupiers (many of whom are equity-rich) and can assist in encouraging households to downsize. However, bungalows are a low-density form of development and as such are land-intensive for the amount of floorspace created. Given the requirement to achieve an uplift in the density of development, the council does not consider that it is appropriate to set a specific target for these.

Specialist and Supported Accommodation

1.13 To meet specific needs and to offer a real choice of accommodation, there is a need to provide an element of housing as specialist or supported housing. This may be required to address permanent needs, or longer term or shorter-term timescales which meet temporary needs. Development should refer to the National Statement of Expectations for Supported Housing (MHCLG, 2020) for further guidance.

1.14 Specialist and supported accommodation may include housing for older people, people with disabilities or ongoing support needs, student housing, self-build and custom build housing, the build to rent sector or hostels and may fall within C2, C3 or Sui Generis planning use classes depending on the nature of the accommodation.

1.15 The LHNA and Paragraph 10 (Reference ID: 63-010-20190626) of the PPG set out some of the different types of specialist housing:

- Age restricted general market housing
- Retirement living or sheltered housing
- Extra care housing or housing-with-care
- Residential care and nursing homes

1.16 Further to this, the LHNA specifies the different types of specialist housing into three main categories of accommodation which are:

- Housing with Support (retirement/sheltered housing)
- Housing with Care (enhanced sheltered/extra-care housing)

- Care/Nursing Home

1.17 Specialist and supported accommodation may include housing for older people, people with disabilities or ongoing support needs, student housing, self-build and custom build housing, the build to rent sector or hostels and may fall within C2, C3 or Sui Generis planning use classes depending on the nature of the accommodation.

Housing for Older People and People with Disabilities

1.18 Given the strong link between people's ages and levels of disability, the LHNA considers housing needs from these groups together. In assessing the need for housing for older people the LHNA sets out that there is projected to be a notable increase in the population aged 65 and over and given the ageing population and higher levels of disability and health problems amongst older people the LHNA identifies that there is likely to be an increased requirement for specialist housing options in future.

1.19 When using the scenario based on the Housing Learning & Information Network's (SHOP@) modelling assumptions, for Three Rivers there is projected to be a requirement for 1,276 homes between 2024 – 2041 for older people. The LHNA divides this between 'housing with support' which covers retirement living and sheltered housing, and 'housing with care' which covers extra care housing or housing-with-care. The total requirement comprises:

- Housing with support – Affordable: -281 homes
- Housing with support – Market: 975 homes
- Housing with care – Affordable: 109 homes
- Housing with care – Market: 473 homes

1.20 The LHNA also considers the need for older persons accommodation within a C2 Use Class (residential care homes and nursing homes) which also suggests a notable need in future for 678 care beds between 2024 – 2041. This is also based off the Housing Learning & Information Network's (SHOP@) modelling assumptions.

1.21 Over 80% of over-65 households in Three Rivers are under-occupying homes. In addition to meeting the housing requirements of people over 65, the provision of smaller properties through the general mix of housing under this policy will allow for downsizing, as well as provision of specific accommodation such as retirement and/or extra care housing will help release under-occupied homes to meet other housing needs in the area.

1.22 The LHNA estimates that there is a need for 322-584 wheelchair user homes in Three Rivers over the plan period. There is also a significant increase projected in the population with a range of disabilities. Requirements for Accessible and Adaptable Dwellings M4(2) and Wheelchair User Dwellings M4(3) are therefore addressed in the policy above.

Accessible and Adaptable Dwellings

1.23 Providing a flexible housing stock is an important element of ensuring that a wide range of accommodation needs can be met and that these can respond as needs change over time. As a consequence, all new homes should be designed to be flexible, accessible and adaptable to support the changing needs of individuals and families.

1.24 Given the ageing population in Three Rivers, it is particularly important that there is housing which would be suitable for any occupiers, regardless of whether or not they have a disability at the time of initial occupation

1.25 The LHNA recommendation is that council's should seek as much M4 (2) (accessible and adaptable dwellings) housing as viably possible and 10% of affordable housing to be M4(3) compliant to meet the identified need for wheelchair users over the plan period.

Self-Build and Custom Building

1.26 Self-build and custom build housing is defined in the Housing and Planning Act 2016 as 'the building or completion by individuals, or persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals... [but] does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person'. This type of housing enables people to choose the design or layout of their home, and in many cases custom build houses can be constructed faster and to a higher quality with less risk to builders as the house has effectively been sold before construction.

1.27 The LHNA states the council should implement a policy on strategic sites, where justified and the exact level should be determined in reference to the number and capacity of strategic sites and overall local need in consideration with the committed supply and viability. The need for self-build and custom build housing has been based on demand from the council's Right to Build Register¹.

Houses in Multiple Occupation

1.28 Houses in Multiple Occupation (HMOs) are dwellings lived in by more than one family or groups of individuals who share facilities such as a kitchen or bathroom and can contribute to meeting the housing needs of some of the population, offering a more affordable way to live in the district.

1.29 It is important to get the balance of housing right and conventional residential development is generally considered to be more sustainable as it meets the broadest spectrum of housing need. While planning permission may not always be required to convert a dwelling to an HMO, where permission is required, the balance of housing will be considered as well as living conditions for future occupiers.

¹ <https://www.threerivers.gov.uk/egcl-page/right-to-build>

1.1 Green Belt designation covers approximately 76% of the area of Three Rivers. The fundamental aim of the Green Belt is to prevent urban sprawl and coalescence of settlements by keeping land permanently open. As set out in the National Planning Policy Framework, the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

1.2 Within the Green Belt, there is a general presumption against inappropriate development which should not be approved except in very special circumstances. **Following the update to the NPPF in December 2024, the concepts of grey belt and “Golden Rules” were introduced and form part of assessing whether exceptions to inappropriate development in the Green Belt apply.**

1.3 Protection of the Green Belt and open countryside is a key objective of the Three Rivers Local Plan. However, the Green Belt boundary is tightly drawn around urban areas, and local evidence (including the Urban Capacity Study 2020) has demonstrated that future development needs cannot be accommodated entirely within the urban area.

1.4 The NPPF sets out that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. However, the NPPF does clarify that authorities should review Green Belt boundaries in accordance with the policies in the NPPF and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. As part of its evidence base for the Local Plan, the council has undertaken a Green Belt Review (dated X) to review this in more detail. This Green Belt Review also includes a spatial analysis of grey belt (of land close to settlement edges) across the district.

1.5 Exceptional circumstances to alter Green Belt boundaries include where an authority cannot meet its identified need for new homes, commercial or other development through other means. The Council has considered alternative options for meeting its identified housing need through prioritising development on suitable brownfield sites, optimising the density of development and through discussions with neighbouring authorities in accordance with the NPPF. **However, the lack of previously developed land and tightly drawn Green Belt boundaries means that we will be able to provide approximately 5% of our identified need without incursions into the Green Belt.** As such, the council considers that the exceptional circumstances for alterations to Green Belt boundaries have been met.

1.6 Additionally, the council’s Local Housing Needs Assessment (2024) analyses the needs for different types and tenures of housing, highlighting an acute need for affordable housing across the district. This need, together with the needs for future generations, accommodation for other demographic groups such as the elderly and the delivery of much needed infrastructure, is considered to further constitute the exceptional circumstances required for alteration of Green Belt boundaries.

1.7 While the main focus for development in the district will be the main urban areas, there is also a need for some minor adjustments to the Green Belt boundary to accommodate growth in the most sustainable locations on the edge of existing settlements. Boundary changes are expected to provide land for housing and employment development and may also provide land for school sites and other infrastructure.

Green Belt
<ol style="list-style-type: none">1) The revised Green Belt Boundary is shown on the Policies Map.2) The council will seek to protect Three Rivers' Metropolitan Green Belt against inappropriate development, as defined by national policy.3) Inappropriate development will not be permitted in the Green Belt, unless very special circumstances are demonstrated to outweigh the potential harm, including harm to the openness of the Green Belt and any other harm and the purposes of including land within it.4) Exceptions to the definition of inappropriate development are set out in national policy and those further exceptions set out in Appendix X will be permitted where they comply with other relevant policies in this plan.5) Development proposals, including those involving previously developed land and buildings in the Green Belt, will be considered in accordance with relevant national planning policy and more detailed provisions set out in Appendix X.6) Measures to improve public access to the Green Belt, and to enhance landscapes, visual amenity and biodiversity will be encouraged.7) Guidance on the factors that will be considered in assessing applications for agricultural or forestry dwellings in the Green Belt is contained in Appendix X.

Reasoned Justification:

1.8 The Metropolitan Green Belt is a long-standing instrument of national and regional planning policy. Whilst much guidance is provided in national policy, Policy X and Appendix X supplements this with other relevant local criteria and seek to provide the context for protecting the Green Belt in Three Rivers.

There are high levels of car ownership and usage in Three Rivers, and the demand for and management of parking is an important issue for the district. Three Rivers has Controlled Parking Zones in Rickmansworth and Chorleywood and other parking schemes, including permit parking, which have been established to meet the requirements of existing residents in areas where off-street parking is either limited or not available. Parking space in many areas is frequently used to maximum capacity and, as a consequence, there may be a conflict in the use of space between existing residents and occupiers of new properties.

The provision and management of parking is also an important factor in helping to influence travel demand and modes of travel. As noted within the NPPF, consideration for parking needs to be integral to the design of schemes alongside patterns of movement and can contribute to making high quality places through the reduction in congestion, carbon emissions and unreliable journey times.

Parking
<ol style="list-style-type: none">1) Development should make provision for parking in accordance with the parking standards and the zone based reductions set out in Appendix X (Parking Standards)2) Car parking spaces should be provided in line with the dimensions set out in the Government's Manual for Streets document and any subsequent updates.3) 20% of car parking spaces for major developments (10 dwellings or more) should be unallocated. Major developments should provide a parking management plan to demonstrate how on-site parking spaces will be reserved for residents only.4) Off-street vehicle parking for new developments should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.5) Areas providing parking should be an integral part of a proposal. They should preserve a building's setting and the character of the surrounding area and should provide adequate soft landscaping and surface material to avoid adverse visual impacts and to manage surface water runoff.6) The council will encourage the delivery of infrastructure to support the use of low carbon transport, including requiring electric vehicle charging points to be provided as part of new development in accordance with the standards set out in Appendix 3.7) The provision and/or improvement of a car club by a new development will be supported if deemed to be in an appropriate location.

Reasoned Justification

National policy states that when setting local parking standards for residential and non-residential development local planning authorities should take account of:

- The accessibility of the development;
- The type, mix and use of development;

Appendix 12 - Parking

- The availability of and opportunities for public transport;
- Local car ownership levels; and
- The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Parking standards are required in Three Rivers to manage the network and reduce pressure on the on-street supply of parking which can give rise to problems of congestion and reduce road safety.

There is also a need to ensure that sufficient parking is provided to address the needs of all users including parking for people with disabilities, for motorbikes, as well as providing sufficient spaces for low emission vehicles and electric vehicle charging equipment.

Supporting the use of lower emission vehicles as an alternative to high emission vehicles is an important measure to reduce air pollution and carbon emissions in the district.

In order to support sustainable transport choices **and cycle parking standards**, it is also essential that sufficient cycle parking provision is accommodated as part of new development, and that this is safe, secure and convenient for users.

The proposed parking standards (Appendix X) set out the amount of parking to be provided takes account of a number of factors including seeking to reduce unnecessary car trips, promoting effective use of land, making development viable and not creating on street parking pressure which undermines quality of life.

It is proposed that these standards will be applied as a 'standard' (rather than a 'maximum') which may be adjusted upward or downward if robust evidence is provided. As such, the car parking standards should be taken as a starting point and any proposed scheme will be assessed accordingly.

The standards promote fewer spaces in locations better served by public transport. The emphasis is on not trying to provide spaces where they are unnecessary. There may also be opportunities for low car or car free development in highly sustainable locations close to public transport interchanges where space for parking is constrained and controlled parking measures are, or can be put, in place.

APPENDIX 13 - PARKING STANDARDS

The following standards have been taken from the adopted Local Plan 2011-2026, and updated to take account of census data on car and van ownership as well as taking into consideration the latest update to the National Planning Policy Framework (December 2024). They cover standards for car parking, disabled parking, cycle parking, electric vehicles, and parking for powered two-wheelers.

These standards have moved away from a 'maximum' approach and will be applied as a 'standard' which may be adjusted upward or downward if robust evidence is provided. As such, the car parking standards should be taken as a starting point and the proposed scheme will be assessed accordingly. Applicants should explain how the standards have been applied to their individual proposal and, where appropriate, how and why they have deviated from them. The expectation is that development will meet its own needs on-site by providing parking to this standard.

In line with national policy and Hertfordshire County Council's Local Transport Plans, there has long been an increased emphasis on encouraging the use of sustainable transport and reduce our reliance on car travel to reduce emissions, cut congestion and improve our general health and wellbeing. In combination with increasing sustainable travel options, small reductions in parking provision is a commonly adopted strategy to help implement this.

Subsequently, modest reductions have been made in parking provision for residential development and some employment uses. Census data between 2011 and 2021 has shown that while there has been a small increase in the number of cars in the district (less than 5%) it only roughly equates to 1 extra car or van per dwelling built, so overall average car and van ownership has not increased.

We have also benchmarked our standards against neighbouring authorities with similar spatial patterns of development and found that the proposed standards to be around the average.

The standards for car parking may be adjusted according to which sustainability zone the proposed development is located in (zones are indicated in maps on pages X-X).

Zone Type	Car parking provision
Sustainability Zone 1	60% of indicative demand-based parking standard
Sustainability Zone 2	80% of indicative demand-based parking standard
Rest of District	Apply full indicative demand-based standard

The percentages of indicative demand-based standards identify the degree of restraint that will normally be applied to new development within each zone type. For example, a development requiring 10 parking spaces would be reduced to 8 parking spaces in Sustainability Zone 1, where 80% of the indicative demand-based standard would be acceptable. Similarly, this would be reduced to 9 parking spaces in Sustainability Zone 2 where 90% of the indicative demand-based standard would be acceptable.

APPENDIX 13 - PARKING STANDARDS

The standards are applied mainly within a 500m radius of a train station, where you might reasonably expect that car ownership will be a little lower. Rickmansworth as the principal settlement with a wide range of shops and services has a greater reduction applied, due to the dual sustainability benefits of being near a train station and a well serviced town centre.

When compared to other local authority parking standards that apply similar parking reduction zones, Three Rivers is generally higher than average, providing less reduction than our neighbouring comparable authorities. This is mainly due to the fact that while broadly comparable, they do generally have larger, more densely developed main settlement centres with a wider range of facilities and public transport options.

Car Parking Standards

Use Class	Description	Car parking standards
E(a) Retail and Foodstores F2(a) Shops selling essential goods which do not exceed 280sqm and there is no other facility within 1,000 metres	Retail and Small food shops up to 500sqm gross floor area	1 space per 30sqm gross floor area
	Food superstores/hypermarkets up to 2,500sqm retail floor area	1 space per 18sqm gross floor area
E(a) Retail Foodstores	Food superstores/hypermarkets exceeding 2,500sqm retail floor area.	1 space per 15sqm gross floor area
	Food retail parks.	1 space per 14sqm (threshold 1000spm) below this figure to be decided in each case on individual merits (shared parking an overall reduction in provision, taking into account linked trips on site).
E(a) Non-food retail	Non-food retail warehouses with garden centres.	1 space per 25sqm gross floor area
	Non-food retail warehouses without garden centres.	1 space per 35sqm gross floor area

APPENDIX 13 - PARKING STANDARDS

E(a) Non-food retail (cont)	Garden centres up to 4,000sqm gross floor area.	1 space per 25sqm gross floor area
	Garden centres exceeding 4,000sqm gross floor area.	Decided in each case on individual merits.
	Non-food retail parks where individual land use components are known.	Decided in each case on individual merits (shared parking and an overall reduction in provision, taking into account linked to trips on site).
	Non-food retail parks where individual land use components are not known.	1 space per 40sqm gross floor space (shared parking).
E(c) Financial and professional services	Banks, building societies, estate agencies	1 space per 30sqm gross floor area.
Sui generis (betting shops)	Betting shops.	
E(b) Restaurants and Cafés	Restaurant/ cafés	1 space per 5sqm of floorspace of dining area plus 3 spaces per 4 employees.
Sui generis (Drinking Establishments)	Public houses/bars	1 space per 3sqm of floorspace of bar area plus 3 spaces per 4 employees.
Sui generis (Hot Food Takeaways)	Roadside restaurants	1 space per 5sqm of floorspace of dining area plus 3 squares per 4 employees.
	Transport café	1 lorry space per 3.5sqm gross floor area plus 3 spaces per 4 employees.
		1 space per 3sqm of floorspace of public area plus

APPENDIX 13 - PARKING STANDARDS

	Hot food takeaway shops (excluding fast food drive thru restaurants)	3 spaces per 4 employees.
	Fast food drive thru restaurants	1 space per 8sqm gross floor area.
E(g)Business	E(g)(i) offices	1 space per 30sqm gross floor area
	E(g)(ii) research and development, high-tech/ E(g)(iii) light industry.	1 space per 35sqm gross floor area
B2 General Industry	General industry	1 space per 50sqm gross floor space (1 lorry space per 200sqm)
B8 Storage and distribution	Wholesale distribution, builders merchants, storage	1 space per 75sqm gross floor area (1 lorry space per 200sqm)
Use Class	Description	Car parking standards
Business Parks	Mixed E(g)/B2/B8 (unless heavily oriented to B8) for use where individual land use components are not known.	1 space per 40sqm gross floor area (1 lorry space per 200sqm)
C1 Hotels and Hostels	Hotels	<p>1 space per bedroom (including staff accommodation) plus</p> <p>1 space per manager plus</p> <p>2 spaces per 3 staff minus spaces related to staff bedrooms plus</p> <p>1 space per 5sqm dining area plus</p>

APPENDIX 13 - PARKING STANDARDS

		<p>1 space per 3sqm bar area plus</p> <p>1 space per 5sqm public area in conference facility plus</p> <p>1 space per 6sqm of public area in exhibition hall plus</p> <p>a minimum of 1 coach parking space per 100 bedrooms.</p>
	Hostels	3 spaces per 4 units.
	Small (single parent or couple with no children)	1 space per units.
	Family (2 adults and 2 children)	
C2 Residential institutions	<p>Institutions/homes with care staff on premises at all times (excluding nursing homes, hospitals, residential schools, colleges or training centres).</p> <p>Elderly persons residential and nursing homes.</p>	<p>1 space per 5 resident bed spaces plus</p> <p>1 space per 2 staff non-resident (parking for resident staff to be based on general needs standard).</p> <p>0.25 spaces per resident bed space plus;</p> <p>1 space per 2 staff non-resident (parking for resident staff to be based on general needs standard).</p> <p>1 space per 0.5 beds or to be decided on individual merits (including a full transport</p>

APPENDIX 13 - PARKING STANDARDS

	Hospitals	assessment and proposals in a green transport plan); special hospitals must be considered individually.
Use Class	Description	Car parking standards
C2 Residential institutions (cont)	Education – halls of residence.	1 space per 2 full-time staff plus 1 space per 6 students (but with linkage to student transport plans where appropriate).
C3 Residential	General needs HMO Flats 1 bedroom dwellings 2 bedroom dwellings 3 bedroom dwellings 4 or more bedroom dwellings	 0.5 spaces per bedroom 0.5 spaces per bedroom 1 space 1.5 spaces 2 spaces 2.5 spaces
C3 Residential	Elderly person's accommodation. Retirement dwellings – no warden control, 1 or 2 bedroom (Category 1). Sheltered dwellings – warden control (Category 2)	 1.5 spaces per unit including 0.25 visitor space. 0.75 spaces per unit including 0.25 visitor space.

APPENDIX 13 - PARKING STANDARDS

C4 Residential	Houses in multiple occupation (i.e. separate households sharing facilities)	0.5 spaces per tenancy
F1 Learning and non-residential Institutions	<p>F1(e) Public halls/places of assembly (excluding D2)</p> <p>F1(f) Places of worship</p>	<p>1 space per 9sqm gross floor area or 1 space per 3 fixed seats plus 3 spaces per 4 staff members</p> <p>1 space per 10sqm gross floor area</p>
F2(b) Halls or meeting places for the local community	F2(b) Community/family centres	1 space per 9sqm gross floor area plus 1 space per full time staff member or equivalent
E(f) Day centres	E(f) Day centres	1 space per 2 staff members plus 1 space per 3 persons attending or 1 space per 9sqm gross floor area
E(e) Provision of medical or health services Non-residential Institutions	E(e) Surgeries and clinics	3 space per consulting room plus 1 space per employee other than consulting doctors/dentists/vets.
Use Class	Description	Car parking standards
F1 Learning and non-residential Institutions (Cont)	F1(d) Libraries and miscellaneous cultural buildings (including F1(b) buildings for display of works of art, F1(c) museums and F1(g) law	1 space per 30sqm gross floor area of freestanding development (otherwise assessed on merits).

APPENDIX 13 - PARKING STANDARDS

	courts) Miscellaneous cultural buildings.	2 spaces plus 1 space per 30sqm of public floorspace.
F1 Learning and non-residential Institutions	F1(a) Educational establishments (including residential). F1(a) Schools	1 space per full-time member of staff plus 1 space per 8 pupils over 17 years old plus 1 space per 20 pupils under 17 years old.
F1 Learning and non-residential Institutions	F1(a) Further education	1 space per 2 staff plus 1 space per full-time 15 students (2500sqm threshold). The standard for students attending an educational establishment, rather than full-time equivalent.
E(f) Crèche, day nursery	E(f) Nursery schools/Playgroups	1 space per 4 pupils.
E(d) Indoor sport, recreation or fitness F2(c) Outdoor sport and recreation F2(d) Indoor or outdoor swimming pools or ice skating rinks Sui generis (cinemas, concert halls, bingo halls, dance halls)	Places of entertainment/leisure parks for use when individual land use components are known. Places of entertainment/leisure parks for use when individual land use components are not known.	1 space per 22sqm (threshold 1000sqm) below threshold to be decided in each case on individual merits: parking for individual land use components should be based on the standards set out in this appendix, but with an overall reduction in provision to reflect linked trips on site (all parking should be shared and an overall reduction of 25% should form the starting point for discussion). 1 space per 22sqm (1000sqm threshold)
Sui generis (cinemas)	Cinemas (including multiplexes)	1 space per 5 seats (1000sqm threshold)

APPENDIX 13 - PARKING STANDARDS

Use Class	Description	Car parking standards
E(d) Indoor sport, recreation or fitness F2(c) Outdoor sport and recreation F2(d) Indoor or outdoor swimming pools or ice skating rinks	F2(d) Swimming pools.	1 sp per 22 sq m (1000 sq m threshold)
	F2(c) / E(d) Tennis/badminton	4 spaces per court not to exceed 1 space per 22sqm (1000sqm threshold)
	E(d) Squash courts	3 spaces per court not to exceed 1 space per 22sqm (1000sqm threshold)
	F2(d) Ice rinks	1 space per 12sqm gross floor area of rink not to exceed 1 space per 22sqm (1000sqm threshold)
	E(d) Fitness centres/sports clubs	1 space per 22sqm (1000sqm threshold)
E(d) Indoor sport, recreation or fitness	Ten pin bowling	4 space per lane not to exceed 1 space per 22sqm (1000sqm threshold)
	Indoor bowls	4 space per rink not to exceed 1 space per 22sqm (1000sqm threshold)
F2(c) Outdoor sport and recreation	Outdoor Sports Grounds	
	with football pitches	20 spaces per pitch
	without football pitches	50 spaces per hectare
F2(c) Outdoor sport or recreation	Golf	
	18 hole golf course	100 spaces

APPENDIX 13 - PARKING STANDARDS

	9 hole golf course	60 spaces
	golf driving range	1.5 spaces per tee
	golf course larger than 18 holes and/or for more than local use	To be decided in each case on individual merits
Sui generis (Motor Trade Related)	Showroom car sales	3 spaces per 4 employees plus 1 space per 10 cars displayed.
	Vehicle storage	3 spaces per 4 employees plus 2 spaces per showroom space or provision at rate of 10% annual turnover.
	Hire cars	3 spaces per 4 employees plus 1 space per 2 hire cars based at site.
	Ancillary vehicle storage	3 spaces or 75% of total if more than 3 vehicles.
	Workshops	3 spaces per 4 employees plus 3 spaces per bay (for waiting and finished vehicles) in addition to repair bays.
	Tyre and Exhaust	3 spaces per 4 employee plus 3 spaces for customers.
	Part stores/sales	3 spaces per 4 employees plus 3 spaces for customers.
	Car wash/petrol filling station	3 spaces per 4 employees plus 3 waiting spaces per bay or run in to row of bays (additional parking is required where a shop is provided).

APPENDIX 13 - PARKING STANDARDS

Passenger transport facilities	Rail Stations/bus Stations	To be decided in each case on individual merits.
Sui generis (where specific use is not included as a description elsewhere in this appendix)		To be decided in each case on individual merits

Parking for Disabled Motorists

The parking needs of disabled motorists shall be met in full irrespective of location i.e. where the zonal procedure results in on-site parking restraint, there shall be *no* corresponding reduction in disabled spaces. The minimum measurements of a disabled space provided off the highway should be 3.2m in width and 4.8m in length. Disabled spaces provided on the highway must comply with the requirements of Hertfordshire Highways Authority.

Employment generating development	
(1) Up to 200 space car park (demand-based as calculated from above standards).	Individual spaces for each disabled employee plus 2 spaces or 5% of total capacity, whichever is greater.
(2) More than 200 space car park (demand-based as calculated from above standards).	6 spaces plus 2% of total capacity.
Shops/premises to which the public have access/recreation.	
(1) Up to 200 space car park (demand-based as calculated from above standards).	3 spaces or 6% of total capacity whichever is greater.
(2) More than 200 space car park (demand-based as calculated from above standards)	4 spaces plus 4% of total capacity.
Residential	
General	1 space for every dwelling built to mobility standards (such as Lifetime Homes). 3 spaces

APPENDIX 13 - PARKING STANDARDS

Elderly persons dwellings up to 10 spaces (demand-based as calculated from above standards)	1 space per 4 spaces
More than 10 spaces (demand-based as calculated from above standards).	

Cycle Parking Standards

Cycle parking standards have been developed for each Use Class. It is recognised that cycle theft deters greater use and thus the type of cycle provision is important. The cycle parking standards differentiate between short and long term requirements. 'Sheffield' stands are satisfactory for short term cycle parking and supervised 'cycle parks' provide better weather and security protection for long term use.

'Full time staff equivalents' is the main parameter used to express long term cycle parking standards as this can be directly related to modal split targets. The long term standards relate to a modal split target of 10% by cycle, but should be adjusted (up or down) locally to accord with local targets and/or those set out in green transport plans. While it is questionable whether realistic estimates of employee numbers will always be possible at the planning application stage, available data on floorspace: worker ratios is inadequate for converting modal split targets to standards based on 'gross floor area' (an alternative parameter).

Use Class	Description	Cycle parking standards
E(a) Retail Foodstores F2(a) Shops selling essential goods which do not exceed 280sqm and there is no other facility within 1,000 metres	Small food shops up to 500sqm gross floor area Food superstores/hypermarkets up to 2,500sqm retail floor area	1 short-term space per 150sqm gross floor area plus 1 long-term space per 10 maximum staff on site at any one time.
E(a) Retail Foodstores	Food superstores/hypermarkets exceeding 2,500sqm retail floor area. Food retail parks	1 short-term space per 250sqm gross floor area plus 1 long-term space per 10 maximum staff on site at any one time.
E(a) Non-food retail	Non-food retail warehouses with garden centres.	1 short-term space per 350sqm gross floor area plus 1 long-term space per 10

APPENDIX 13 - PARKING STANDARDS

	<p>Non-food retail warehouses without garden centres.</p> <p>Garden centres up to 4,000sqm gross floor area</p> <p>Garden centres exceeding 4,000sqm gross floor area.</p> <p>Non-food retail parks where individual land use components are known.</p> <p>Non-food retail parks where individual land use components are not known.</p>	maximum staff on site at any one time.
E(c) Financial and professional services	Banks, building societies, estate agencies	1 short-term space per 200sqm gross floor area plus 1 long-term space per 10 full time staff.
Sui generis (betting shops)	Betting shops.	

Use Class	Description	Cycle parking standards
E(b) Food and drink	Restaurant/cafes	1 short-term space per 100sqm gross floor area plus 1 long-term space per 10 maximum staff on site at any one time.
Sui generis (Drinking Establishments)	Public houses/bars	1 short-term space per 100sqm gross floor area plus 1 long-term space per 10 maximum staff on site at any one time
Sui generis (Hot Food Takeaways)	<p>Hot food takeaway shops (excluding fast food drive thru restaurants)</p> <p>Fast food drive thru restaurants</p>	1 short-term space per 100sqm gross floor area plus 1 long-term space per 10 maximum staff on site at any one time

APPENDIX 13 - PARKING STANDARDS

Sui generis (Hot Food Takeaways)	Roadside restaurants Transport café	1 long-term space per 10 maximum staff on site at any one time.
E(g) Business	E(g)(i) offices E(g)(ii) research and development, high-tech/ E(g)(iii) Light industry.	1 short-term space per 500sqm gross floor area plus 1 long-term space per 10 full time staff
B2 General Industry	General industry	1 short-term space per 500sqm gross floor area plus 1 long-term space per 10 full time staff
B8 Storage and Distribution	Wholesale distribution, builders merchants, storage	1 long-term space per 10 full time staff
Business Parks	Mixed E(g)/B2/B8 (unless heavily oriented to B8) for use where individual land use components are not known.	1 short-term space per 500sqm gross floor area plus 1 long-term space per 10 full time staff
C1 Hotels and Hostels	Hotels	1 long-term space per 10 beds plus 1 long-term space per 10 maximum staff on site at any one time
C1 Hotels and hostels	Hostels Small (single parent or couple with no children) Family (2 adults and 2 children)	1 long-term space per 3 units
C2 Residential institutions	Institutions/homes with care staff on premises at all times (excluding nursing homes, hospitals, residential schools, colleges or training centres).	1 short-term space per 20 beds plus 1 long-term space per 10 staff on duty at any one time.

APPENDIX 13 - PARKING STANDARDS

	Elderly persons residential and nursing homes. Hospitals	
Use Class	Description	Cycle parking standards
C2 Residential institutions	Education – halls of residence.	1 long-term space per 10 full time staff plus 1 long-term space per 3 students.
C3 Residential	General needs 1 bedroom dwellings 2 bedroom dwellings 3 bedroom dwellings 4 or more bedroom dwellings Houses in multiple occupation (i.e. separate households sharing facilities)	1 long-term space per unit (or per room if HMO) if no garage or shed provided.
C3 Residential	Flats	1 space per 2 units
C3 Residential	Elderly person's accommodation. Retirement dwellings – no warden control, 1 or 2 bedroom (Category 1). Sheltered dwellings – warden control (Category 2)	1 short-term space per 3 units plus 1 long-term space per 5 units

APPENDIX 13 - PARKING STANDARDS

F1 Non-residential Institutions	F1(e) Public halls/places of assembly (excluding D2) F1(f) Places of worship	1 short-term space per 200sqm gross floor area plus 1 long-term space per 10 staff on duty
F2(b) Halls or meeting places for the local community	F2(b) Community/family centres	1 short-term space per 200sqm gross floor area plus 1 long-term space per 10 staff on duty
E(f) Day centres	E(f) Day centres	1 short-term space per 200sqm gross floor area plus 1 long-term space per 10 staff on duty
E(e) Provision of medical or health services	E(e) Surgeries and clinics	1 short-term space per consulting room plus 1 long-term space per 10 staff on duty at any one time.
F1 Learning and non-residential Institutions	F1(d) Libraries and miscellaneous cultural buildings (including F1(b) buildings for display of works of art, F1(c) museums and F1(g) law courts)	1 short-term space per 100sqm gross floor area plus 1 long-term space per 10 full time staff
F1 Learning and non-residential Institutions	F1(a) Educational establishments (including residential). F1(a) Schools	1 long-term space per 10 full time staff plus: a) Primary School: 1 long-term space per 15 students. b) Secondary School: 1 long-term space per 5 students.
Use Class	Description	Cycle parking standards
F1 Learning and non-residential Institutions	F1(a) Further education	1 long-term space per 10 full time staff plus 1 long-term space per 5 students

APPENDIX 13 - PARKING STANDARDS

E(f) Crèche, day nursery	E(f) Nursery schools/playgroups	1 long-term space per 10 full time staff.
E(d) Indoor sport, recreation or fitness F2(c) Outdoor sport and recreation F2(d) Indoor or outdoor swimming pools or ice skating rinks Sui generis (cinemas, concert halls, bingo halls, dance halls)	Places of entertainment/leisure parks for use when individual land use components are known. Places of entertainment/leisure parks for use when individual land use components are not known.	On merit, depending upon mix of uses.
Sui generis (cinemas)	Cinemas (including multiplexes)	Cinemas up to 500 seats: 1 short-term space per 20 seats plus 1 long-term space per 10 staff on duty at any one time. Cinemas over 500 seats: 25 short-term spaces plus 1 short-term space per 100 seats in excess of 500 plus 1 long-term space per 10 staff on duty at any one time.
E(d) Indoor sport, recreation or fitness F2(c) Outdoor sport and recreation F2(d) Indoor or outdoor swimming pools or ice skating rinks	F2(d) Swimming pools. F2(c) / E(d) Tennis/badminton E(d) Squash courts F2(d) Ice rinks E(d) Fitness centres/sports clubs	1 short-term space per 25sqm
E(d) Indoor sport, recreation or fitness	Ten pin bowling Indoor bowls	1 short-term space per 3 lanes or rink plus 1 short-term space per 25 spectator seats

APPENDIX 13 - PARKING STANDARDS

		plus 1 long-term space per 10 full time staff.
F2(c) Outdoor sport and recreation	Outdoor sports grounds with football pitches without football pitches	1 short-term space per 10 players/participants at busiest period
F2(c) Outdoor sport or recreation	Golf 18 hole golf course 9 hole golf course golf driving range golf course larger than 18 holes and/or for more than local use	10 long-term spaces 5 long-term spaces 5 short-term spaces per 20/30 tee driving range Pro rata to the above
Sui generis (Motor trade related)	Showroom car sales Vehicle storage Hire cars Ancillary vehicle storage Workshops Tyre and Exhaust Part stores/sales Car wash/petrol filling station	1 long-term space per 10 full time staff. 1 long-term space per 10 full time staff plus 5 short-term spaces if shop included
Passenger transport facilities	Rail Stations Bus Stations	5 long-term spaces per peak period train 2 l/t spaces per 100 peak period passengers

APPENDIX 13 - PARKING STANDARDS

In addition to cycle parking provision it is also expected that shower and changing facilities are provided. If not built in as part of the normal facilities of a building (in schools and hospitals for example), commercial and institutional uses should consider providing a small room where people can change in privacy. Experience shows that such a facility will not only be used by cyclists, but other staff engaged in exercise activity during lunch breaks or after hours. It need not be looked on as a burden.

For commercial and institutional uses, shower and changing facilities should be provided at a minimum rate of 1 locker per 10 persons and 1 shower cubicle per 50 persons.

Proposals for a reasonable level of provision for fewer personnel will be assessed on their merits according to the location, use and travel needs of the personnel.

Electric Vehicle Standards

Electric vehicles are a sustainable mode of transport that contribute to a reduction in vehicle emissions. An electric vehicle is considered any road vehicle with a battery that is intended to be charged from mains electricity. National policy supports the provision of electric vehicle recharging infrastructure with new development. Electrical vehicle standards have been developed for each Use Class, with a distinction between active provision and passive provision.

Active provision: an actual socket connected to the electrical supply system that vehicle owners can plug their vehicle into.

Passive provision: the network of cables and power supply necessary so that at a future date a socket can be added easily.

Use Class	Description	Electric vehicle parking standards
E(a) Retail Foodstores F2(a) Shops selling essential goods which do not exceed 280sqm and there is no other facility within 1,000 metres	Small food shops up to 500sqm gross floor area Food superstores/hypermarkets up to 2,500sqm retail floor area	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(a) Retail Foodstores	Food superstores/hypermarkets exceeding 2,500sqm retail floor area.	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.

APPENDIX 13 - PARKING STANDARDS

	Food retail parks	
E(a) Non-food retail	<p>Non-food retail warehouses with garden centres.</p> <p>Non-food retail warehouses without garden centres.</p> <p>Garden centres up to 4,000sqm gross floor area</p> <p>Garden centres exceeding 4,000sqm gross floor area.</p> <p>Non-food retail parks where individual land use components are known.</p> <p>Non-food retail parks where individual land use components are not known.</p>	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(c) Financial and professional services	Banks, building societies, estate agencies, betting shops.	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.

Use Class	Description	Electric vehicle parking standards
E(b) Food and drink	Restaurant/cafes	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
Sui generis (Drinking Establishments)	Public houses/bars	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.
Sui generis (Hot Food Takeaways)	Hot food takeaway shops (excluding fast food drive thru restaurants)	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.

APPENDIX 13 - PARKING STANDARDS

	Fast food drive thru restaurants	
Sui generis (Hot Food Takeaways)	Roadside restaurants Transport café	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(g) Business	E(g)(i) offices E(g)(ii) research and development, high-tech/E(g)(iii) light industry.	20% of all spaces to be active provision, a further 40% of spaces to be passive provision.
B2 General Industry	General industry	20% of all spaces to be active provision, a further 40% of spaces to be passive provision.
B8 Storage and Distribution	Wholesale distribution, builders merchants, storage	20% of all spaces to be active provision, a further 40% of spaces to be passive provision.
Business Parks	Mixed E(g)/B2/B8 (unless heavily oriented to B8) for use where individual land use components are not known.	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
C1 Hotels and Hostels	Hotels	20% of all spaces to be active provision, a further 40% of spaces to be passive provision.
C1 Hotels and hostels	Hostels Small (single parent or couple with no children) Family (2 adults and 2 children)	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
C2 Residential institutions	Institutions/homes with care staff on premises at all times (excluding nursing homes, hospitals, residential schools, colleges or training centres).	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.

APPENDIX 13 - PARKING STANDARDS

	Elderly persons residential and nursing homes. Hospitals	
Use Class	Description	Electric vehicle parking standards
C2 Residential institutions	Education – halls of residence.	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
C3 Residential	1 bedroom dwellings 2 bedroom dwellings 3 bedroom dwellings 4 or more bedroom dwellings Houses in multiple occupation (i.e. separate households sharing facilities)	20% of all spaces to be active provision, the remaining 80% to be passive provision; Houses to have 1 charging point per house.
C3 Residential	Elderly person's accommodation. Retirement dwellings – no warden control, 1 or 2 bedroom (Category 1). Sheltered dwellings – warden control (Category 2)	20% of all spaces to be active provision, the remaining 80% to be passive provision.
F1 Learning and non-residential Institutions	F1(e) Public halls/places of assembly (excluding D2)	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.

APPENDIX 13 - PARKING STANDARDS

	F1(f) Places of worship	
F2(b) Halls or meeting places for the local community	F2(b) Community/family centres	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(f) Day centres	E(f) Day centres	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(e) Provision of medical or health services	E(e) Surgeries and clinics	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.
F1 Learning and non-residential Institutions	F1(d) Libraries and miscellaneous cultural buildings (including F1(b) buildings for display of works of art, F1(c) museums and F1(g) law courts)	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
F1 Learning and non-residential Institutions	F1(a) Educational establishments (including residential). F1(a) Schools	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
Use Class	Description	Electric vehicle parking standards
F1 Learning and non-residential Institutions	F1(a) Further education	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(f) Crèche, day nursery	E(f) Nursery schools/playgroups	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(d) Indoor sport, recreation or fitness F2(c) Outdoor sport and recreation F2(d) Indoor or outdoor swimming pools or ice skating rinks	Places of entertainment/leisure parks for use when individual land use components are known. Places of entertainment/leisure parks for use when individual land use components are not known.	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.

APPENDIX 13 - PARKING STANDARDS

Sui generis (cinemas, concert halls, bingo halls, dance halls)		
Sui generis (cinemas)	Cinemas (including multiplexes)	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(d) Indoor sport, recreation or fitness F2(c) Outdoor sport and recreation F2(d) Indoor or outdoor swimming pools or ice skating rinks	F2(d) Swimming pools. F2(c) / E(d) Tennis/badminton E(d) Squash courts F2(d) Ice rinks E(d) Fitness centres/sports clubs	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
E(d) Indoor sport, recreation or fitness	Ten pin bowling Indoor bowls	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
F2(c) Outdoor sport and recreation	Outdoor sports grounds with football pitches without football pitches	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
Use Class	Description	Electric vehicle parking standards
F2(c) Outdoor sport or recreation	Golf	20% of all spaces to be active provision, a further 30% of spaces to be passive provision.
Sui generis (Motor trade related)	Showroom car sales Vehicle storage Hire cars Ancillary vehicle storage Workshops	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.

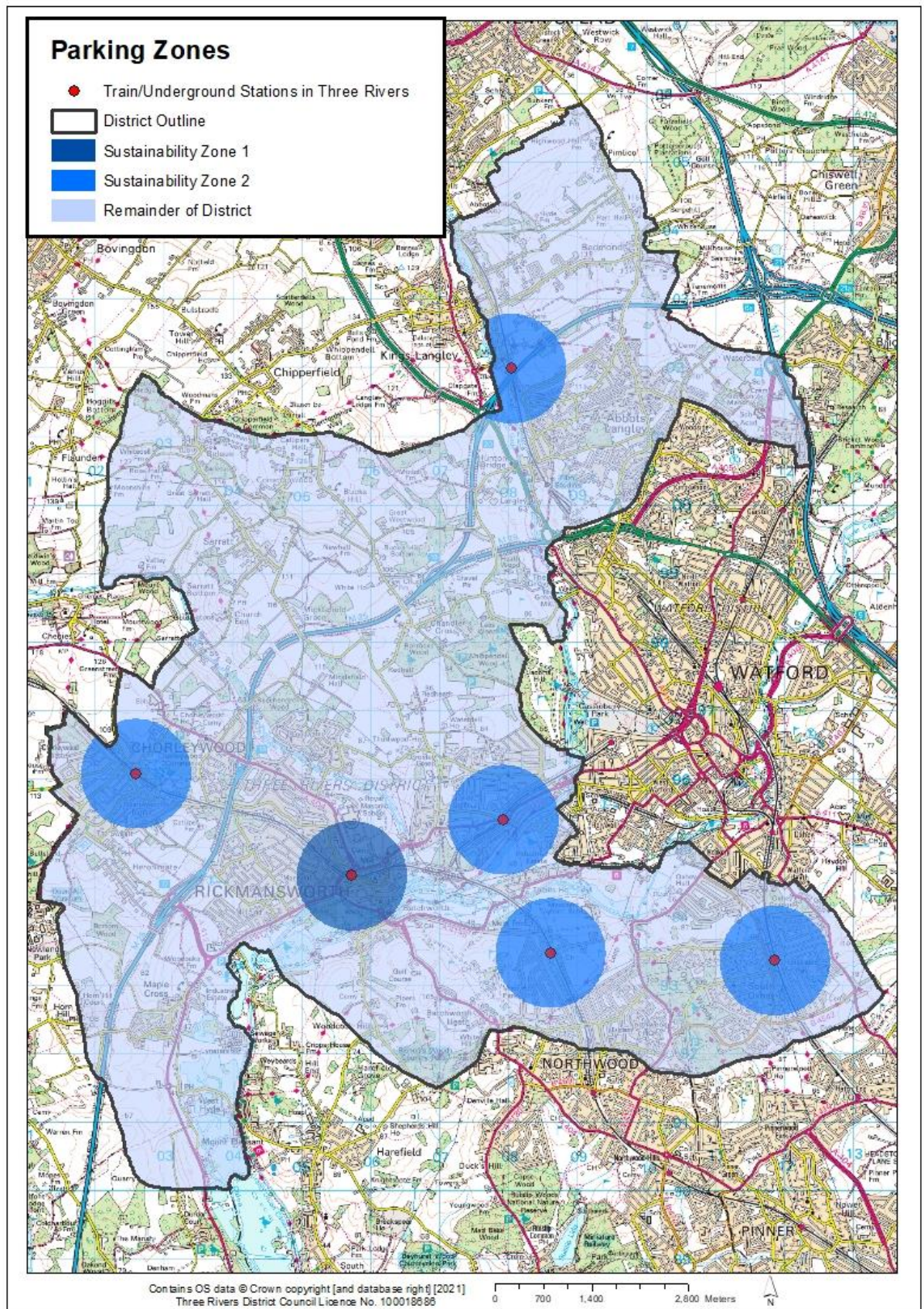
APPENDIX 13 - PARKING STANDARDS

	Tyre and Exhaust Part stores/sales Car wash/petrol filling station	
Passenger transport facilities	Rail Stations	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.
	Bus Stations	20% of all spaces to be active provision, a further 20% of spaces to be passive provision.

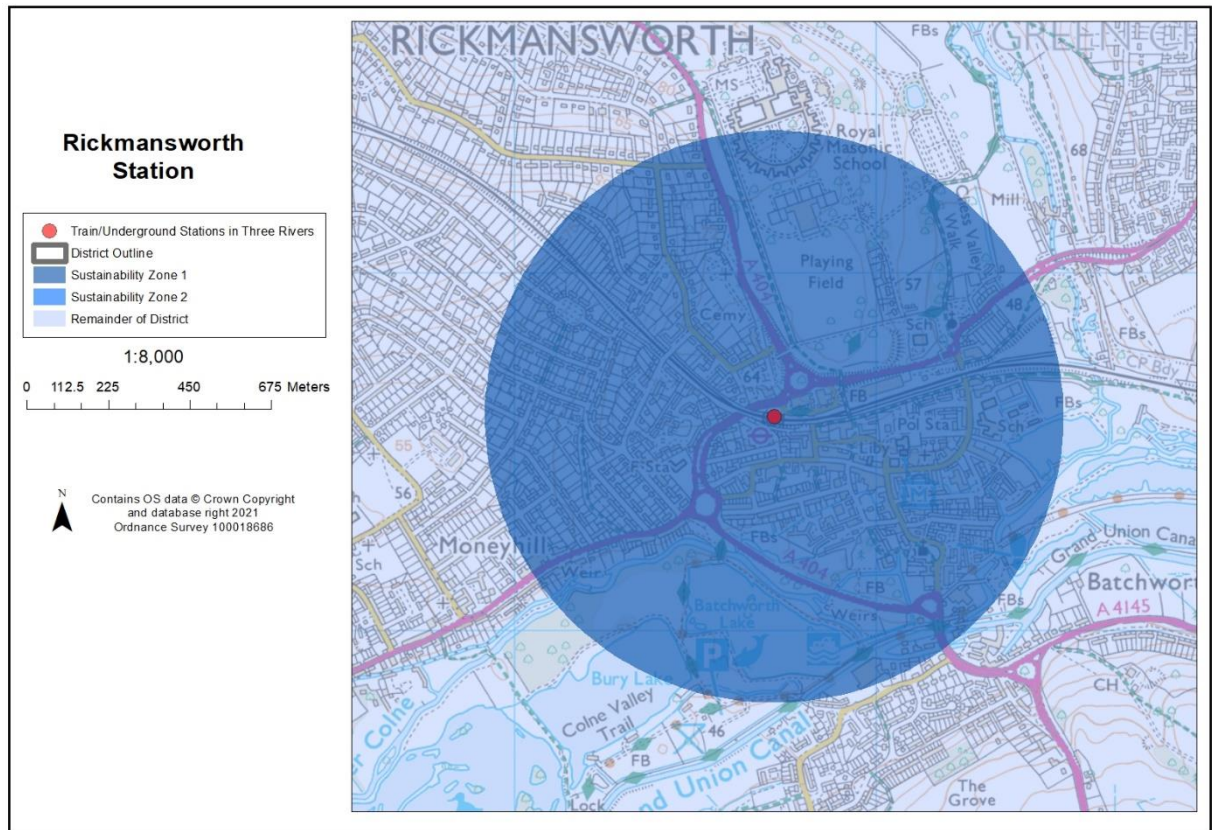
Powered Two-Wheeler Parking Standards

Motorcycles comprise around 3% of all registered vehicles, and recent large increases in sales of mopeds and other commuter machines have resulted in further demand on existing motorcycle parking places, with indications that this trend will continue. As a guide, local authorities should set aside around 4% of the total stock of publicly accessible motor vehicle parking space for motorcycle use. Local authorities should also take steps to ensure that workplaces, new developments, and other parking not under their direct control, includes sufficient provision to ensure pressure is not simply concentrated on local authority provision. Powered two wheeler parking should therefore be provided at approximately five per cent of the amount of car parking to be provided on a site. Each use needs to be considered on its merits.

Parking Zones – Whole District:

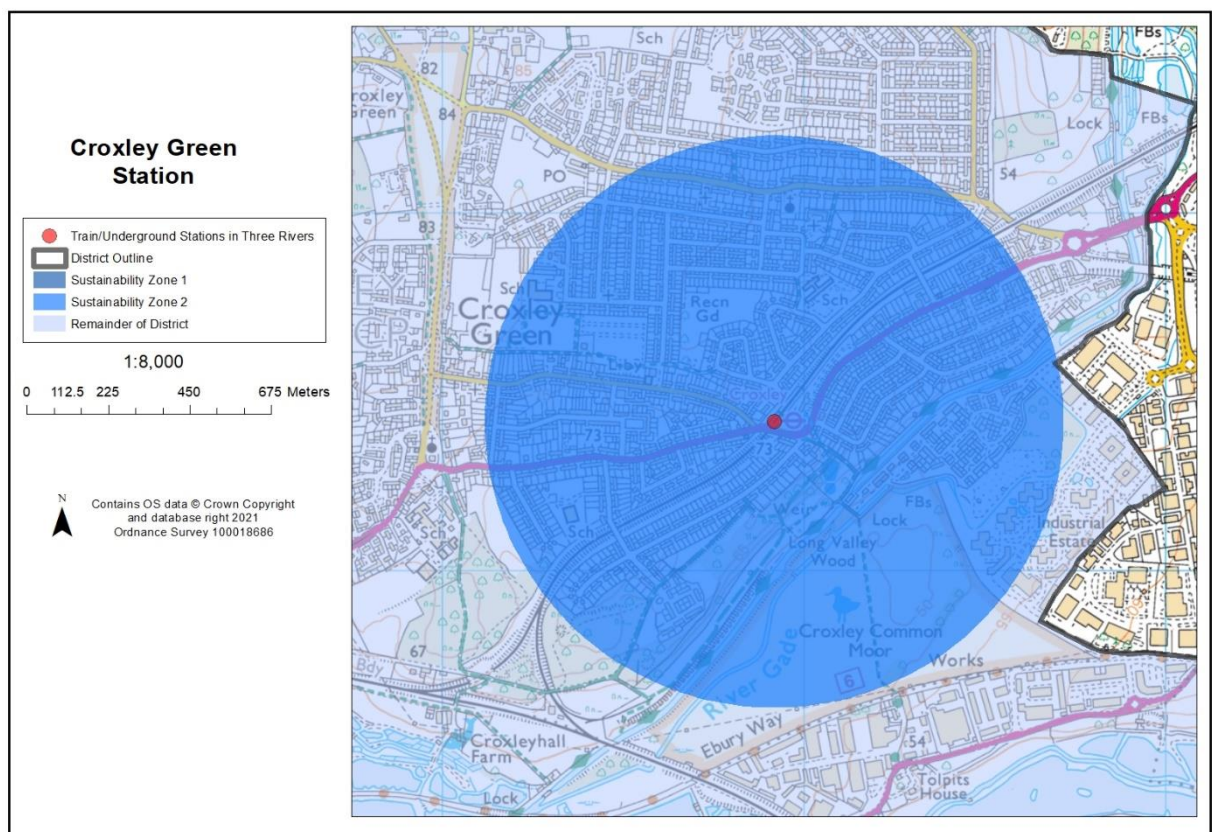
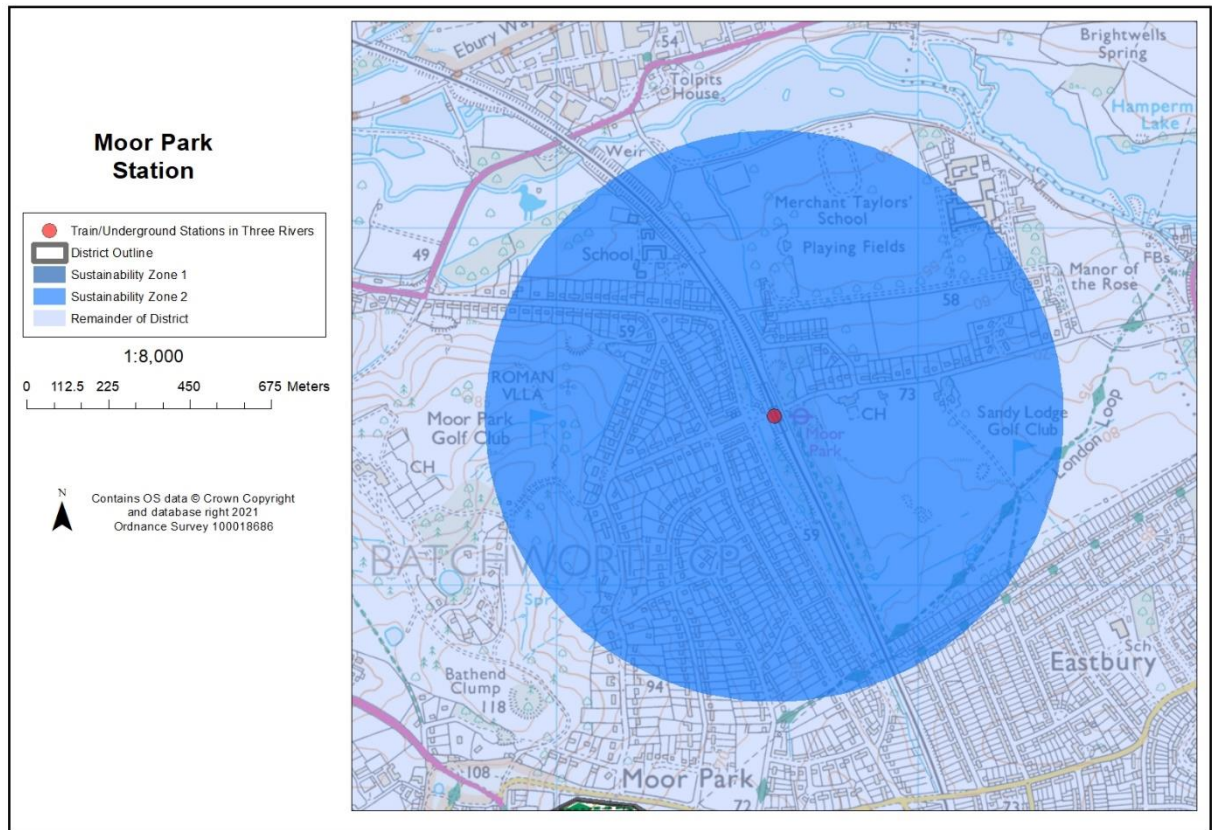


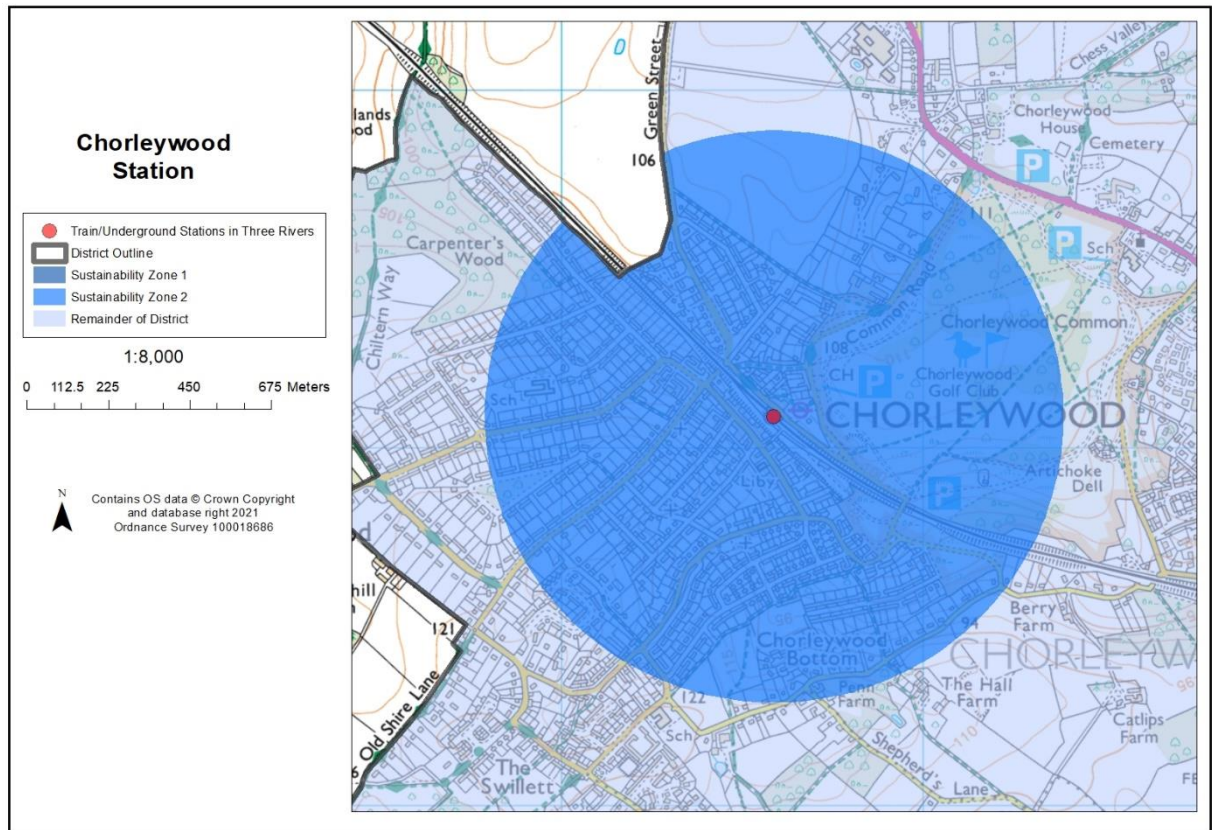
Sustainability Zone 1:



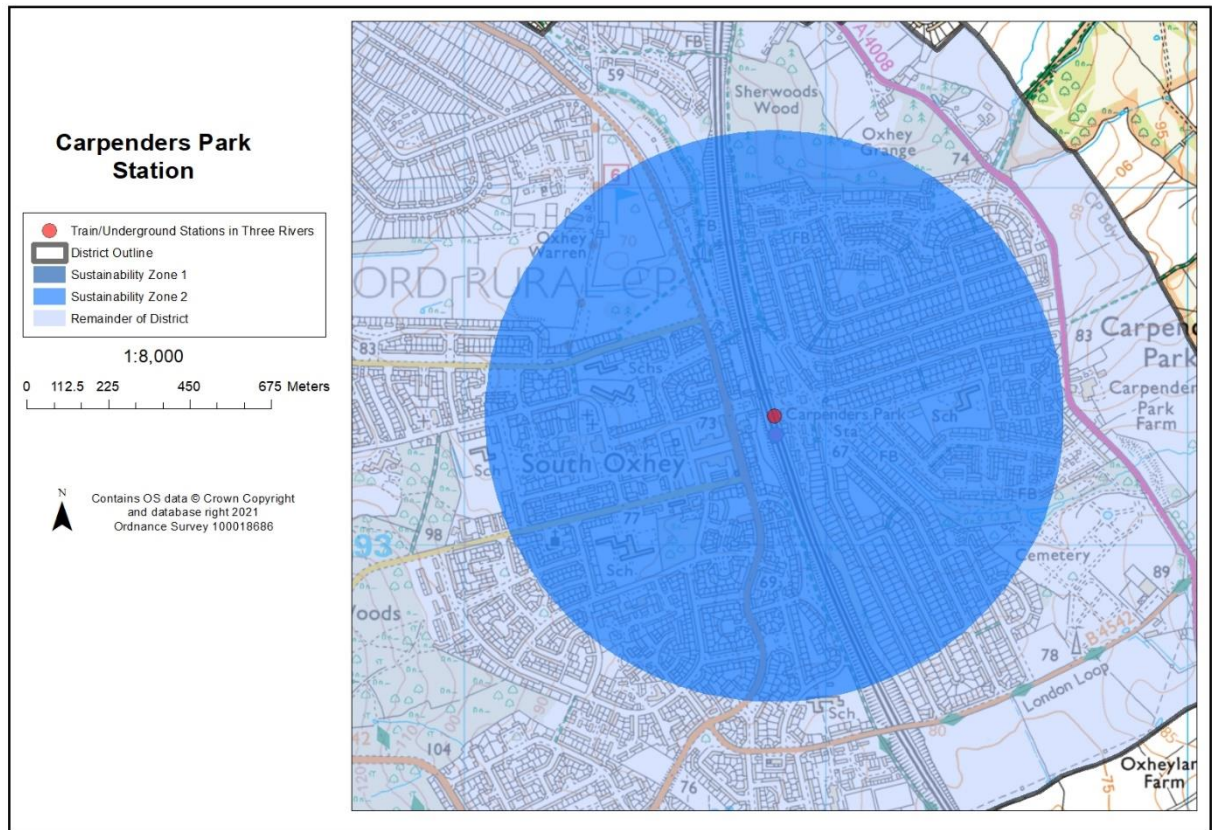
Sustainability Zone 2:

APPENDIX 13 - PARKING STANDARDS

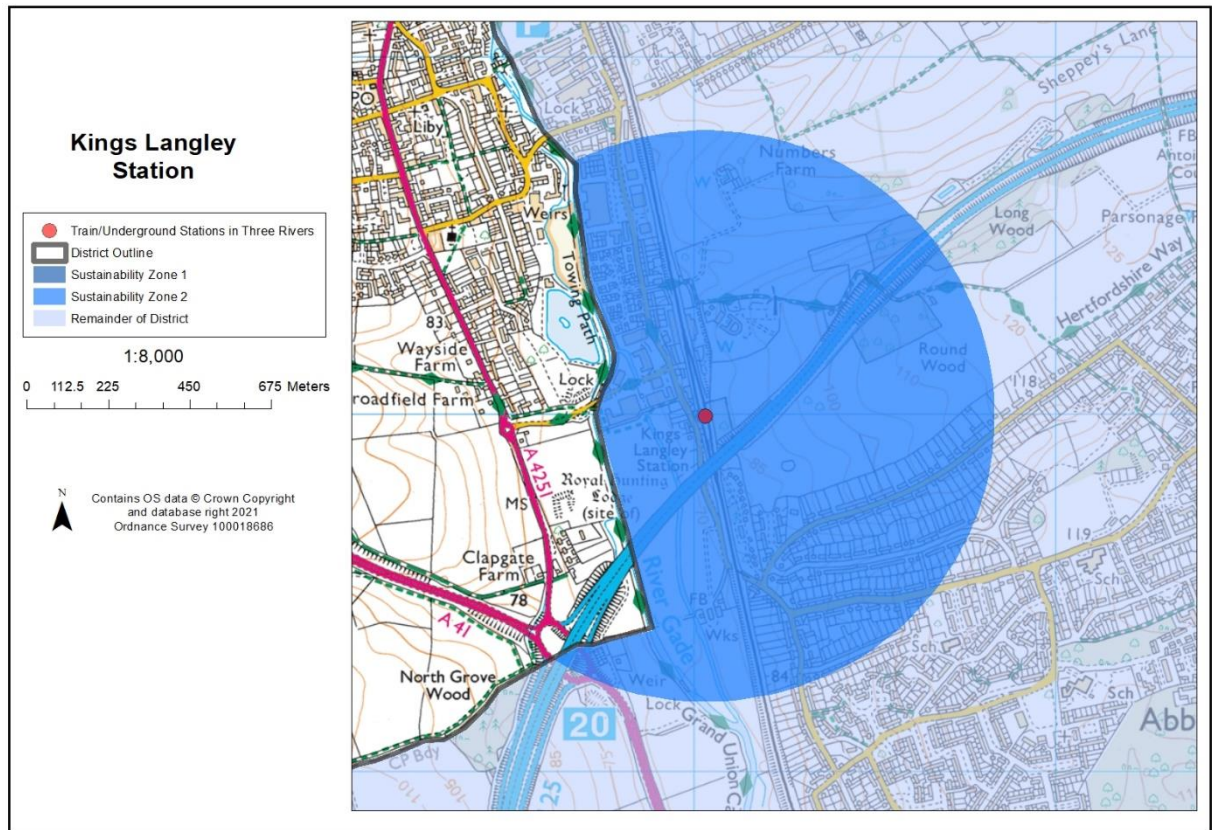




APPENDIX 13 - PARKING STANDARDS



APPENDIX 13 - PARKING STANDARDS



This page is intentionally left blank

Three Rivers District Council

Local Plan Sub-Committee Report

25 November 2025

PART I

**Gypsy, Traveller and Travelling Showpeople Update
(DoF)**

1 Summary

- 1.1 This report provides an overview of how the council can meet its identified need for gypsies, travellers and travelling showpeople. The report will provide policy context, review approaches of some neighbouring local authorities, discuss the findings of the council's GTAA and explain some of the potential approaches that can be taken to meet the accommodation needs of gypsies, travellers and travelling showpeople.
- 1.2 The officer recommendation is for Members of the Local Plan Sub-Committee to note the contents of this report and agree with officers' recommendation that the council focusses on intensifying and expanding sites/yards where possible and allocate parts of strategic general needs housing sites to meet the remaining need.

2 Policy Context

- 2.1 Paragraph 63 of the National Planning Policy Framework (NPPF) sets out that "within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children ;older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes". Footnote 27 within Paragraph 63 of the NPPF sets out that "Planning Policy for Traveller Sites (PPTS) sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document".
- 2.2 Policy B of the PPTS relates to planning for traveller sites in a plan-making context. Paragraph 9 sets out that:
- 2.3 "Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities".
- 2.4 Paragraph 10 sets out that when producing their Local Plan, local planning authorities should:
 - a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
 - b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;

c) consider production of joint development plans that set targets on a cross authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);

d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and

e) protect local amenity and environment

3 Key Findings from the Gypsy and Traveller Accommodation Assessment (July 2025)

3.1 The Council's Gypsy and Traveller Accommodation Assessment (July 2025) is an evidence study used to aid the implementation of Local Plan Policies and the provision of new gypsy and traveller pitches and travelling showpeople plots to cover the Council's Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites. The GTAA can be found in Appendix 1.

3.2 As set out by the GTAA, in terms of gypsies and travellers, the need of 37 pitches arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites). The need of 4 pitches arising from households with undetermined need will be met through criteria-based policies.

3.3 In terms of travelling showpeople, the need of 6 plots arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites). The need of 10 plots arising from households with undetermined need will be met through criteria-based policies.

3.4 Figure 1 below sets out the need for gypsy and traveller pitches by year periods, including the identified 5 year need (2025-2029).

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	21	1
6 – 10	2030 – 34	5	1
11 – 15	2035 – 39	7	1
16 – 20	2040 – 41	4	1
0 – 20	2025 – 41	37	4

Figure 1. Need for gypsy and traveller pitches by year periods

3.5 Figure 2 below sets out the need for travelling showpeople plots by year periods, including the identified 5 year need (2025-2029).

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	6	5
6 – 10	2030 – 34	0	2
11 – 15	2035 – 39	0	2
16 – 20	2040 – 41	0	1
0 – 20	2025 – 41	6	10

Figure 2. Need for travelling showpeople plots by year periods

4 Planning Applications in Three Rivers

4.1 Since the publication of the GTAA, the following applications have been submitted:

Application Number	Address	Gypsy/Traveller or Travelling Showpeople	Description	Net Gain in Pitches
25/1117/FUL	Land South of Old House Lane Kings Langley WD4 8RR	Gypsy/Traveller	Change of use of land for use as a residential caravan site, for one Gypsy/Traveller pitch accommodating two caravans (of which no more than one would be a static caravan/mobile home), alterations to existing hardstanding and erection of amenity building	Permitted for 1 pitch
25/0597/FUL	Land Adjoining Westwood End Bucks Hill Kings Langley Hertfordshire WD4 9AS (new site)	Gypsy/Traveller	Change of use to a residential caravan site, for occupation by Gypsies/Travellers, comprising the siting of 2 static caravans with associated access and hardstanding	Pending
25/1106/FUL	Little Lilly	Gypsy/Traveller	Removal of Condition 1 (Personal Permission), Condition 2 (Land Restored) and Variation of Condition 3 (Plans) and Condition 6 (Numbers of Caravans) pursuant to planning permission 23/1618/FUL to allow for an increase in number of static caravans to 10 and no provision of touring caravans	Withdrawn
25/0590/FUL	Land North of Toms Lane (new site)	Gypsy/Traveller	Change of use of land to create 4no. gypsy and traveller pitches including associated hardstanding and access	Pending

Figure 3. Summary of planning applications since publication of the GTAA

4.2 Since the publication of the GTAA, 1 pitch has been permitted by the council via a planning application. A total of 6 pitches are pending consideration. If the two pending planning applications are permitted, officers consider the district's overall identified need of 41 pitches would be reduced by 7 to 34.

5 Approaches by Neighbouring Local Authorities

St Albans City and District Council:

- 5.1 The St. Albans City & District Local Plan was submitted to the Secretary of State for Independent Examination on 29 November 2024. They undertook a specific Call for Sites for Gypsies and Travellers in July 2024. The GTAA for St Albans City and District Council identified a need to plan for 80 pitches for those households who met the planning definition (under the 2023 NPPF definition) and 15 pitches for households with undetermined need (when using the locally derived proportion percentage), **totalling 95 pitches**. In their submission version of the plan, 2 sites were identified to supply around 40 pitches (which broadly meets their 5-year need), and half of the total need arising from those who meet the planning definition. St Albans' submitted plan includes a criteria-based policy for the undetermined Gypsy and Traveller sites and pitches that don't meet the planning definition.
- 5.2 Following the Stage 1 Hearing Sessions of the Examination of the St. Albans City and District Local Plan, St Albans City and District Council consulted on additional evidence relating to gypsy and traveller accommodation between 4 July and 22 August 2025. The evidence suggested changes to the Local Plan and a list of sites. Further to the hearing session held on 15 October 2025, St Albans has now proposed that additional changes are made to their Local Plan, including the identification of specific sites to meet the identified need for gypsy and traveller accommodation in full and changes to Policy HOU6.
- 5.3 The policy has been amended to:
- Include specific reference to the accommodation needs of gypsies and travellers (which in St Albans case is 95 pitches) and the accommodation needs of travelling showpeople (which in St Albans case is 7 plots) and fully explain how this need will be met in full
 - Refer to the proforma assessment of the existing traveller sites in the district and the sites which were put forward in the Gypsy and Traveller Call for Sites. The identification of sites as 'Allocations' or 'Identified Opportunity Sites' reflects the degree to which there is evidence that they are likely to deliver additional pitches in the plan period.
 - Be specific in relation to how many pitches are expected within specific strategic sites (i.e 20, not up to 20)

Dacorum Borough Council:

- 5.4 Dacorum Borough Council submitted their Local Plan for examination in March 2025. The GTAA identified a need to plan for 20 pitches for those households who met the planning definition (under the 2023 NPPF definition) and 14 pitches for households with undetermined need (when using the locally derived proportion percentage), **totalling 34 sites**. Their allocated sites include 20 pitches across strategic sized housing developments, which meets their identified need (under the 2023 NPPF definition). A criteria-based policy is also in place, to account for the undetermined gypsy and traveller sites and pitches

that don't meet the planning definition. In terms of travelling showpeople, the GTAA identified a need for 1 plot for households that met the planning definition. In their Local Plan, Dacorum stated that *"as the need for the showpeople yard is too small to justify a specific allocation, this can best be secured through an appropriate windfall planning application that we will test against suitable criteria within Strategic Policy H5"*.

- 5.5 Interestingly, whilst Dacorum have planned to meet their planning definition need in full (unlike St Albans' original submission), they have not allocated sites to meet any of their undetermined need. It must be noted that Dacorum submitted their plan for examination a number of months after St Albans, so are "behind" in terms of examination progress, so it is not yet known whether they will have to follow a similar course of action as St Albans and also meet part of their undetermined need (when applying the locally derived proportion of households meeting the planning definition).
- 5.6 In terms of gypsies and travellers, Three Rivers' need from undetermined households is 4 pitches, which is significantly lower than St Albans (19) and Dacorum (30). St Albans' and Dacorum's respective GTAA's set out that their high locally derived proportion of households that met the planning definition meant that they could have additional "determined" need derived from their high undetermined need. To put it simply, both Dacorum and St Albans had high levels of undetermined need, potentially due to a lack of interviews or information allowing the consultants to confirm whether a household met the planning definition of a traveller. A locally derived proportion of households that meet the planning definition is essentially the likelihood of a household meeting the planning definition based on local factors. In St Albans' case their GTAA set out *"there is a need for 19 pitches for undetermined households. If the locally derived proportion of households that met the planning definition (79%) were applied, this could result in a need for 15 pitches"*. Dacorum's GTAA set out *"there is a need for 30 pitches for undetermined households. If the locally derived proportion of households that met the planning definition (46%) were applied, this could result in a need for 14 pitches"*.
- 5.7 Prior to the Local Plan Sub-Committee meeting on 25th November, officers are meeting with ORS (consultants who produced our GTAA) to discuss whether we need to also consider the undetermined need when allocating sites in the emerging Local Plan. Members will be verbally updated on this at the meeting.

6 Three Rivers' Approach

- 6.1 As suggested by the GTAA, there are a range of different methods in order to meet identified need, and often a combination of methods is most effective. The approaches can be categorised as a criteria-based policy approach, regularisation, extension or intensification of existing sites, allocating entirely new gypsy and traveller sites, or allocating parts of strategic general needs housing sites. Given the scale of need identified in Three Rivers recently, it is likely that a combination of approaches will be required.

Travelling Showpeople Need

- 6.2 Three Rivers currently has 5 travelling showpeople yards. Two of which have planning permissions and 3 of which are "tolerated", and do not have planning permission.
- 6.3 In line with other councils, officers consider that the regularisation of these sites could contribute to the council meeting identified need for travelling showpeople.

There is currently a total of 19 “tolerated” plots across the district, which if were to be regularised, would result in 19 plots contributing to the identified need. This approach will be discussed further with ORS before the Local Plan Sub-Committee Meeting on 25th November 2025 and verbally reported back to Members.

Call for Sites

- 6.4 Despite previous call for sites consultations being open for all types of housing, these have not resulted in any sites being put forward for specifically gypsy and traveller pitches or travelling showpeople plots.
- 6.5 Given the significant identified need for both gypsy and travellers and travelling showpeople, and the relatively limited number of private sites within the District (which may have limited scope for expansion), it was deemed necessary to undertake a call for sites exercise for solely gypsy and travelling showpeople sites, to help identify any potential additional sites, in addition to the existing sites.
- 6.6 The gypsy, traveller and travelling showpeople call for sites period started on Friday 4 July and ended at 5pm on Monday 4 August 2025. The council did not receive any formal submissions that were suitable, available and achievable.
- 6.7 As such, the council can not rely on allocating new gypsy and traveller sites or travelling showpeople yards.

Intensification/Expansion of Existing Sites/Yards

- 6.8 The table below sets out an Initial assessment of the capacity to expand or intensify existing sites/yards.

Site/Yard	G/T or TSP	Approximate Developable Area (DA)	Current no. of pitches/plots	Max capacity	Potential Increase
Land adjacent 321B Uxbridge Road, Mill End, WD3 8DS	G/T	200sqm	1	The current 1	0
The Oaklands, Bedmond Road, Bedmond, WD5 0QE	G/T	5000sqm	24	The current 24	0
Fir Trees, Dawes Lane, Sarratt, WD3 6BG	G/T	n/a	2	n/a	n/a
Little Lily, Land rear of 59 Toms Lane, Kings Langley, WD4 8NT	G/T	3,400sqm	9	The current 9	0

Little Liz, Old House Lane, Kings Langley, WD4 8RS	G/T	10,000sqm	17	27	10
Keepers Cottage, Solesbridge Lane, Chorleywood, WD3 6AA	G/T	800sqm	1	3	2
Rear of 317-319 Uxbridge Road, Mill End, WD3 2DS	TSP	18,500sqm	16	19	3
Rear of 321 Uxbridge Road, Mill End, WD3 8DS	TSP	11,000sqm	2	11	9
Brickfield Farm, Oxhey Lane, Carpenders Park, WD19 5RF	TSP	10,600sqm	The current 15 (tolerated)	15	15 from regularisation
Meander, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP	1500sqm	The current 2 (tolerated)	2 plots	2 from regularisation
Wood Yard, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP	1500sqm	The current 2 (tolerated)	2 plots	2 from regularisation

Figure 4. Initial assessment of the capacity to expand or intensify existing sites/yards

- 6.9 In terms of gypsy and traveller pitches, the GTAA sets out that “whilst there is no standard size for a Gypsy and Traveller pitch, guidance recommends an average pitch size of 320sqm”. As such, we have used an average pitch size of 320sqm to assess capacity of existing sites. It must be noted that the assessment also took into account site constraints and requirement for infrastructure (such as amenity buildings) and tracks/roads.
- 6.10 The initial assessment concludes that there may be potential to expand/intensify 2 existing gypsy/traveller sites, resulting in an additional 12 pitches. This will be investigated in greater detail by officers.
- 6.11 In terms of travelling show people, the GTAA sets out that “*whilst there is also no standard size for a Travelling Showpeople plot, guidance recommends an average plot size of 2,000sqm. However, this should be viewed with some caution given the age of the guidance. In more recent years many Showpeople have sought to diversify their working practices and do not now need as much space for the storage or maintenance of larger rides. Recent planning*

applications in other local authorities have seen plans for new yards put forward including a variety of plot sizes". St Albans used an average of 720sqm for their travelling showpeople plots (although this was based partly on their only yard in their district).

- 6.12 Figure 4 above shows an initial capacity assessment of the travelling showpeople yards in the district. We have used a relatively conservative plot average of 1000sqm to assess capacity at existing yards. The table shows that there may be potential to intensify the use of 2 of the sites to result in an increase of 12 plots. This will be investigated in greater detail by officers.
- 6.13 Additionally, there is a piece of land to the south of "Rear of 317-319 Uxbridge Road, Mill End" and "Rear of 321 Uxbridge Road, Mill End" which could potentially be considered as an opportunity site for development. Further investigations would have to take place into ownership and potential site constraints before this is potentially allocated.

Allocations within Strategic Sites

- 6.14 Given the above, allocating parts of strategic general needs housing sites may be the largest contributor to meeting the accommodation needs of gypsies and travellers. This is an approach used by adjoining authorities such as St Albans and Dacorum.
- 6.15 It must be noted that allocating parts of strategic sites for gypsy and traveller accommodation will slightly reduce the overall capacity of such sites to provide general needs housing, which may impact upon the financial viability of the strategic scheme, however, it is not expected that a requirement to provide gypsy and traveller pitches would make a large-scale scheme unviable. It is envisioned that multiple strategic sites would be necessary to fulfil meeting the district's gypsy and traveller need, as it is unlikely to be feasible for one or even two strategic sites to fulfil the remaining need once expansion or intensification of existing sites has been considered.
- 6.16 Therefore, in Three Rivers' case, strategic sites can play a vital role in meeting the accommodation needs of gypsies, traveller and travelling showpeople.

Future Approach

- 6.17 As set out above there are a range of different methods in order to meet identified need, and often a combination of methods is most effective. In Three Rivers' case, allocating new standalone gypsy and traveller sites or travelling showpeople yards is not feasible given the lack of land being put forward during the call for sites. Additionally, there is limited capacity on most of the existing sites/yards to expand or intensify.
- 6.18 As such, officers recommend that the council focus on intensifying and expanding sites/yards where possible and allocate parts of strategic general needs housing sites to meet the remaining need.

7 Policy/Budget Reference and Implications

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

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

8.1 Given the requirements of the NPPF and PPTS, if the council does not meet its identified gypsy, traveller and travelling showpeople need there is a strong possibility that the Plan may be found unsound at examination.

9 Recommendation

9.1 That the Local Plan Sub-Committee:

- Note the contents of this report
- Agree with officers' recommendation that the council focusses on intensifying and expanding sites/yards where possible and allocate parts of strategic general needs housing sites to meet the remaining need.

10 Background Papers

National Planning Policy Framework (2024)

Planning Practice Guidance (2024)

Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

Planning Policy for Traveller Sites (December 2024)

Report prepared by: Aaron Roberts, Senior Planning Officer

11 Appendices

Appendix 1 –Three Rivers District Council Gypsy and Traveller Accommodation Assessment (July 2025)

This page is intentionally left blank



Three Rivers District Council Gypsy and Traveller Accommodation Assessment (GTAA)

Final Report

July 2025



Opinion Research Services, The Strand, Swansea, SA1 1AF

Contributors

Steve Jarman, Michael Bayliss, Elliot Muldoon, Hanna Lloyd, Rhys Evans, Scott Lawrence, Jonathan Lee and Nigel Moore

Fieldwork

ORS GTAA Fieldwork Team

Enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

© Copyright 2025

Please note that some of the tables include rounded figures. This may result in some column or row totals or % not adding up to 100 or to the anticipated row or column totals due to the use of rounded decimal figures.

The below copyrights acknowledge the open-source data that is provided by the respective bodies and is used throughout this document

May contain Ordnance Survey data © Crown copyright and database right 2025

May contain Royal Mail data © Royal Mail copyright and database right 2025

May contain National Statistics data © Crown copyright and database right 2025

May contain public sector information licensed under the Open Government Licence v3.0

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	5
Introduction and Methodology	5
Background	6
Key Findings	6
Recommendations	8
2. INTRODUCTION	10
Definitions	10
Legislation and Guidance for Gypsies and Travellers	12
3. METHODOLOGY.....	15
Background	15
Our approach to Fieldwork	15
Desk-Based Review	16
Stakeholder Engagement.....	16
Community Engagement	16
Bricks and Mortar Households	17
Timing of the Fieldwork	17
Our Analysis	18
Dealing with Undetermined Households.....	18
Calculating the Current and Future Need.....	19
4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES/YARDS AND POPULATION.....	22
Introduction	22
Sites and Yards.....	23
MHCLG Traveller Caravan Count	24
5. STAKEHOLDER ENGAGEMENT	25
Introduction	25
Views of Key Stakeholders and Council Officers	25
Neighbouring Authorities	26
6. SURVEY OF TRAVELLING COMMUNITIES.....	27
Interviews with Travellers.....	27
7. CURRENT AND FUTURE PITCH PROVISION	28
Introduction	28
New Household Formation Rates	28
Household Planning Status	30
Interviews with Gypsies and Travellers in Bricks and Mortar	31
Migration/Roadside	31
Public Sites.....	31
Gypsy and Traveller Needs	32
Pitch Needs – Undetermined Gypsies and Travellers.....	33
Travelling Showpeople Needs	35
Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition	35
Plot Needs – Undetermined Travelling Showpeople.....	36
Transit Requirements	37

8. CONCLUSIONS	39
Gypsies and Travellers	39
Travelling Showpeople.....	40
Transit Provision	40
Summary of Need to be Addressed – Gypsies and Travellers.....	41
Summary of Need to be Addressed – Travelling Showpeople	41
APPENDICES	43
Appendix A: Glossary of Terms / Acronyms Used	43
Appendix B: Site and Yard List	45
Appendix C: Household Interview Questionnaire	46
Appendix D: Household Formation Rates.....	53
TABLE OF CONTENTS	55
1. INTRODUCTION	56
Abstract and Conclusions.....	56
Introduction	56
2. MODELLING POPULATION AND HOUSEHOLD GROWTH RATES	57
Migration Effects	57
Population Profile	57
Birth and Fertility Rates	58
Death Rates.....	59
Modelling Outputs.....	59
Household Growth.....	59
3. CONCLUSIONS	62

TABLE OF FIGURES

Figure 1 – Need for Gypsy and Traveller households in Three Rivers (2025 – 2041)	7
Figure 2 – Need for Gypsy and Traveller households by year periods	7
Figure 3 – Need for Travelling Showpeople households in Three Rivers (2025 – 2041)	8
Figure 4 – Need for Travelling Showpeople households by year periods.....	8
Figure 5 - Total amount of provision in Three Rivers (2025)	23
Figure 6 – Interviews completed in Three Rivers.....	27
Figure 7 – Planning status of households in Three Rivers.....	30
Figure 8 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition.....	32
Figure 9 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition by year periods	33
Figure 10 – Need for undetermined Gypsy and Traveller households in Three Rivers	33
Figure 11 – Need for undetermined Gypsy and Traveller households in Three Rivers by year periods.....	34
Figure 12 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition	35
Figure 13 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition by year periods	35
Figure 14 – Need for undetermined Travelling Showpeople households in Three Rivers.....	36
Figure 15 – Need for undetermined Travelling Showpeople households in Three Rivers by year periods ...	36
Figure 16 – Total Need for Gypsy and Traveller households	41
Figure 17 – Total Need for Travelling Showpeople households	42

1.EXECUTIVE SUMMARY

Introduction and Methodology

- 1.1 The primary purpose of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the Three Rivers District Council (the Council) area.
- 1.2 This GTAA provides a credible evidence base which can be used to support the preparation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2025 - 2041. This covers the Council's Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS). The outcomes of this study supersede the outcomes of the previous GTAA for the Council.
- 1.3 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the Council area through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community. This includes those living on all known sites, yards, and encampments, as well as seeking to engage with households living in bricks and mortar accommodation.
- 1.4 A total of 44 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Three Rivers. A total of 20 interviews were completed with Travelling Showpeople yards in Three Rivers.
- 1.5 A total of 9 stakeholder interviews were also completed.
- 1.6 The baseline date for the study is June 2025.

Background

- 1.7 Gypsy and Travellers Local Plan Policies should give consideration to addressing need from households that meet the 2024 PPTS planning definition through the intensification or expansion of the existing sites and yards where need has been identified. Consideration should then be given to granting planning permission for any temporary and unauthorised sites or yards. If any residual need remains then consideration will need to be given to the allocation of new pitches or plots.
- 1.8 The Council should also put in place a Criteria-Based Local Plan Policy (as suggested in Paragraph 11 in the PPTS) to manage the need from Undetermined households, as well as to deal with any potential windfall applications, potential need from in-migration, or from bricks and mortar.
- 1.9 Paragraph 62 of the National Planning Policy Framework (NPPF) 2024 sets out that in determining the minimum number of homes needed, *strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*
- 1.10 Paragraph 63 then states that [emphasis added] *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes.*
- 1.11 Footnote 27 to this section states that ‘*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.*’

Key Findings

- 1.12 The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Three Rivers, the Council have been provided with more detailed breakdowns to support the preparation of any future Local Plan Policies.

Pitch Needs – Gypsies and Travellers

- 1.13 In June 2025 the Council identified 54 Gypsy and Traveller pitches in Three Rivers:
- » 6 private sites with permanent planning permission (54 pitches);
- 1.14 Our research concluded that 56 Gypsy or Traveller households met the 2024 PPTS planning definition and there were 3 households where it was not possible to confirm their status. These 3 households are likely to meet the 2024 PPTS planning definition and are referred to as Undetermined Households for the purposes of this GTAA.
- 1.15 Our research identified a need for **37 pitches** emerging from the 56 households that met the 2024 PPTS planning definition. This is made up of 14 pitches for concealed/doubled-up/over-crowded households; 4 pitches from a 5-year need from teenage children; 3 pitches from in-migration/roadside; and 16 pitches from new household formation, using a formation rate of 1.7%.

- ^{1.16} There is also a need for **4 pitches** emerging from the 3 undetermined households. This is made up of a modelled need for 1 pitch from concealed/doubled-up/over-crowded households or single adults and 3 pitches from new household formation, using the ORS national formation rate of 1.50%.
- ^{1.17} The overall pitch needs for Gypsies and Travellers for the period 2025 - 2041 are summarised in Figure 1.

Figure 1 – Need for Gypsy and Traveller households in Three Rivers (2025 – 2041)

Status	2025 – 2041
Need from households who meet the Planning Definition	37
Undetermined	4
TOTAL	41

- ^{1.18} The need from households that meet the planning definition and for undetermined households can be distributed across year periods as shown in Figure 2.

Figure 2 – Need for Gypsy and Traveller households by year periods

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	21	1
6 – 10	2030 – 34	5	1
11 – 15	2035 – 39	7	1
16	2040 – 41	4	1
0 – 16	2025 – 41	37	4

Plot Needs – Travelling Showpeople

- ^{1.19} In June 2025 the Council identified 37 Travelling Showpeople plots in Three Rivers:
- » 2 private Travelling Showmen's yards (18 plots)
 - » 3 tolerated Travelling Showmen's yards (19 plots)
- ^{1.20} Our research concluded that 24 Travelling Showpeople households met the 2024 PPTS planning definition and there were 16 households where it was not possible to confirm their status. These 16 households are likely to meet the 2024 PPTS planning definition and are referred to as Undetermined Households for the purposes of this GTAA.
- ^{1.21} Our research identified a need for 6 plots emerging from the 24 households that met the 2024 PPTS planning definition. This is made up of 4 plots from concealed/doubled-up/over-crowded households; and 2 plots from a 5-year need from teenage children.
- ^{1.22} There is also a need for 10 plots emerging from the 16 undetermined households. This is made up of a modelled need for 3 plots from concealed/doubled-up/over-crowded households or single adults; a modelled need for 2 plots for a 5-year need from teenage children; and 5 plots from new household formation, using the ORS national formation rate of 1.50%.
- ^{1.23} The overall plot needs for Travelling Showpeople for the period 2025 – 2041 are summarised in Figure 3.

Figure 3 – Need for Travelling Showpeople households in Three Rivers (2025 – 2041)

Status	2025 – 2041
Need from households who meet the Planning Definition	6
Undetermined	10
TOTAL	16

- 1.24 The need from households that meet the planning definition and for undetermined households can be distributed across year periods as shown in Figure 4.

Figure 4 – Need for Travelling Showpeople households by year periods

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	6	5
6 – 10	2030 – 34	0	2
11 – 15	2035 – 39	0	2
16	2040 – 41	0	1
0 – 16	2025 – 41	6	10

Recommendations

Gypsy and Traveller Recommendations

- 1.25 A summary of recommendations for addressing need from Gypsies and Travellers are set out below:
- » It is recommended that need for households living on private sites is addressed through new pitch allocations and the intensification, expansion or reconfiguration of existing sites – considering some of the alternative approaches set out below. In addition, the Council should consider completing a Pitch Deliverability Assessment (PDA) to explore the capacity of existing sites to accommodate additional pitches and/or caravans in more detail.
 - » The Council will have to consider how to address need from undetermined households. In terms of the Local Plan Policies. The Council should consider a Criteria-Based Local Plan Policy.
 - » The Council will need to carefully consider how to address any needs from households who may seek to move to Three Rivers (in-migration/windfall), or from households currently living in bricks and mortar who may wish to move to a site. The Council should consider a Criteria-Based Local Plan Policy.
 - » Regarding need from households that did not meet the planning definition, in general terms, it is the Government's intention that any need for households that do not fall within the PPTS planning definition should be met as a part of general housing need, through separate Local Plan Policies as set out in Paragraph 63 of the NPPF.
 - » For private sites it is also recommended that alternative approaches should be considered when seeking to address the levels of need identified in this GTAA, especially when seeking to meet the need through the intensification or expansion of existing sites. In addition, consideration should be given to granting permanent planning permission for any sites with temporary permission and for any unauthorised sites.
 - » The first approach to consider is in relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term, it is likely that the accommodation need of these individuals could be met

- through additional touring caravans on existing sites which are, generally, each equivalent to the provision of a pitch, as opposed to more formally set out pitches.
- » The second approach to consider is for sites occupied by larger extended family groups. Again, sites like this may be able to meet the overall accommodation needs through a combination of shared static caravans, tourers and dayrooms on existing sites which are, generally, each equivalent to the provision of a pitch – as opposed to more formally set out sites with separate pitches. It is common for conditions in Decision Notices for Travellers sites to simply place limits on the numbers and types of caravans as opposed to placing limits on the number of pitches.
 - » Future need from new household formation could also be met through natural turnover of pitches over time, and through the consideration of enforcing against pitches not found to be occupied by Gypsies or Travellers.

Travelling Showpeople Recommendations

- ^{1.26} A summary of recommendations for addressing need from Travelling Showpeople are set out below:
- » It is recommended that the current need could be addressed through the intensification or expansion of existing yards in Three Rivers.

Transit Recommendations

- ^{1.27} A summary of recommendations for addressing transit need are set out below:
- ^{1.28} Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is a need for a formal public transit site in Three Rivers at this time.
- ^{1.29} It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- ^{1.30} In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

2.INTRODUCTION

- 2.1 The primary purpose of this Gypsy and Traveller Accommodation Assessment (GTAA), is to provide a robust assessment of current and future need for Gypsies, Travellers, and Travelling Showpeople accommodation in Three Rivers District Council.
- 2.2 The outcomes of the study will supersede the outcomes of the previous Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment (GTAA) completed for the Council
- 2.3 The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2024, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2024, and the Planning Practice Guidance (PPG) 2021.
- 2.4 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It can be used to aid the implementation of the Council's Local Plan Policies and the provision of Traveller pitches and plots covering the period 2025 - 2041 to meet the 15-year requirements of the PPTS and the Council's Local Plan period.
- 2.5 In addition to identifying current and future permanent accommodation needs, it seeks to identify any need for transit provision.
- 2.6 The study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.7 The baseline date for the study is June 2025.

Definitions

Planning Policy for Traveller Sites (PPTS) 2024

- 2.8 For the purposes of the planning system, the current planning definition of a Traveller is set out in [PPTS \(2024\)](#). The planning definition set out in Annex 1 states that:

1. For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. For the purposes of this planning policy, "travelling showpeople" means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

3. For the purposes of this planning policy, "travellers" means "gypsies and travellers" and "travelling showpeople" as defined above.

4. For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use plots for "travelling showpeople", which may / will need to incorporate space or to be split to allow for the storage of equipment.

Planning Policy for Traveller Sites, Ministry of Housing, Communities and Local Government (MHCLG)
December 2024

Definition of Travelling

- 2.9 One of the most important questions that GTAA's need to address in terms of applying the planning definition is *what constitutes a nomadic way of life or nomadism*. This has been determined through case law.
- 2.10 **R v South Hams District Council (1994)** – defined Gypsies as *"persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)"* This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.
- 2.11 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 2.12 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if they led a nomadic way of life *only seasonally*.
- 2.13 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought Judicial Review of the Local Authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- 2.14 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base which they set out from and return to.

- ^{2.15} Following the changes to the PPTS in 2024 the planning definition now includes *all other persons with a cultural tradition of nomadism or of living in a caravan*.
- ^{2.16} As a result of this it can be concluded that all Gypsies and Travellers now meet the PPTS 2024 planning definition of a Traveller.
- ^{2.17} There were no changes to the planning definition of a Travelling Showperson made in 2024, but it's assumed that all Travelling Showpeople will meet the Annex 1 planning definition.

Legislation and Guidance for Gypsies and Travellers

- ^{2.18} Policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:
- » [The Housing Act, 1985](#)
 - » [The Equality Act, 2010](#)
 - » [The Housing and Planning Act, 2016](#)
 - » [Planning Practice Guidance¹ \(PPG\), 2021](#)
 - » [Planning Policy for Traveller Sites \(PPTS\), 2024](#)
 - » [National Planning Policy Framework \(NPPF\), 2024](#)
- ^{2.19} In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews also need to be taken into consideration. Relevant examples have been included in this report where appropriate.
- ^{2.20} The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the PPTS (2024). It should be read in conjunction with the National Planning Policy Framework (NPPF) 2024.

Planning Policy for Traveller Sites (PPTS) 2024

- ^{2.21} The PPTS (2024, Paragraph 4), sets out the overall aims of the policy in respect of Traveller sites:
- » That local planning authorities should make their own assessment of need for the purposes of planning.
 - » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
 - » To encourage local planning authorities to plan for sites over a reasonable timescale.
 - » That plan-making and decision-taking should protect Green Belt from inappropriate development.
 - » To promote more private traveller site provision while recognising that there will always be travellers who cannot provide their own sites.
 - » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

¹ With particular reference to the sections on Housing needs of different groups (May 2021).

- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- » To reduce tensions between settled and traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which travellers can access education, health, welfare, and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.

^{2.22} PPTS states in Paragraph 9 that:

Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

^{2.23} PPTS goes on to state in Paragraph 10 that Local Planning Authorities should in producing their Local Plan:

- » Identify and annually update a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets.
- » Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
- » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries).
- » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- » Protect local amenity and environment.

^{2.24} Local Authorities have a duty to ensure a 5-year land supply to meet any need that is identified Traveller sites. However, PPTS also sets out in Paragraph 11 that:

Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

National Planning Policy Framework (2024)

^{2.25} The most recent version of the NPPF was issued in December 2024.

^{2.26} Paragraph 62 of the NPPF sets out that in determining the minimum number of homes needed, *strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*

- ^{2.27} Paragraph 63 then states that [emphasis added] *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes.*
- ^{2.28} Footnote 27 to this section states that ‘*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.*’

Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]

- ^{2.29} In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work due to old age or disability. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.
- ^{2.30} Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it was not quashed or declared unlawful at this time.
- ^{2.31} As a result of the Lisa Smith Judgement, changes to the PPTS in 2023, and following consultation on the NPPF in 2024, the Government made changes to the PPTS in December 2024 to effectively bring all Gypsies and Travellers under the current planning definition.

3.METHODOLOGY

Background

- 3.1 Opinion Research Services (ORS) have been undertaking Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments (GTAA's) for over ten years. Our approach has been regularly refined in light of changes to PPTS in 2015, 2023 and 2024, the Housing and Planning Act (2016), the NPPF (2024), and the PPG (2021), as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS contains a number of requirements for local authorities which must be addressed in a GTAA. Paragraph 7 in the PPTS sets out that local authorities should (a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups; (b) cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up- to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and (c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- 3.3 ORS would note that the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in multiple areas across England².

Our approach to Fieldwork

- 3.4 The stages below provide a summary of the methodology that was used to complete this study.



²ORS have attended Gypsy and Traveller Local Plan Examination Sessions in areas including Bedford, Brentwood, Bristol, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Colchester, Cotswold, Daventry, East Hertfordshire, Gloucester, Leicester, Maldon, Milton Keynes, Newark and Sherwood, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Spelthorne, Tewkesbury, and Waverley.

Desk-Based Review

- 3.5 The secondary data that was reviewed and collated included:
- » Census data.
 - » Traveller Caravan Count data.
 - » Planning history for existing sites and yards.
 - » Records of unauthorised sites/encampments.
 - » Information on active planning applications and appeals.
 - » Information on active enforcement actions.
 - » Existing Needs Assessments and other relevant local studies.
 - » National and local policy, guidance, and best practice.

Stakeholder Engagement

- 3.6 Stakeholder engagement involves three core groups; local Council Officers, neighbouring Planning Officers and representative bodies.
- 3.7 Council Officers help provide a fuller understanding of local issues. This includes information about the progress made in addressing any needs identified in previous GTAA's and about any unauthorised developments. ORS had a total of 3 interviews with Council Officers from Three Rivers District Council.
- 3.8 Planning Officers from neighbouring authorities allow us to explore cross-border issues including transit provision. For this project we engaged with Officers from
- » Buckinghamshire Council
 - » Dacorum Borough Council
 - » Hertsmere Borough Council
 - » London Borough of Harrow Council
 - » London Borough of Hillingdon Council
 - » St Albans City and District Council
 - » Watford Borough Council

Community Engagement

- 3.9 Once we have identified all authorised and unauthorised sites/yards and encampments in the study area we seek to complete an interview with each household. ORS use a census rather than sampling approach as we consider this to be more robust. Sample based approaches can lead to an underestimate of need and GTAA's using sampling are regularly challenged by the Planning Inspectorate.
- 3.10 ORS make at least three separate attempts to contact a household including leaving calling cards and offering appointments.
- 3.11 Interviews are undertaken by experienced fieldworkers who work on our GTAA studies across England and Wales. To ensure consistency in data collection ORS use a standard questionnaire which can be seen in **Appendix C**. The interview captures current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and

travelling characteristics. It also asks about the type of pitches households may require in the future – for example private or socially rented, together with any features they may wish to be provided.

- 3.12 The survey includes questions about the travelling characteristics of household members. Whilst responses to these questions are less relevant now following the changes to the PTS in 2024, ORS feel that this is useful data which supports analysis. This information is useful when seeking to address any identified need as those who do and don't travel may have different pitch/plot requirements.
- 3.13 Where we are unable to complete an interview, we will attempt to gather basic information about each pitch/plot through a proxy interview from sources including neighbouring residents and site management.
- 3.14 In addition to the household interviews fieldworkers make an overall physical assessment of each site to determine any opportunities for intensification or expansion to meet future needs.

Bricks and Mortar Households

- 3.15 The 2021 Census recorded 33 households who identified as either Gypsies or Irish Travellers or Roma, who lived in a house or bungalow in Three Rivers, and 23 living in a flat or maisonette.
- 3.16 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; information from stakeholder interviews; and information from housing registers. Interviews are sought with all identified households.
- 3.17 Through this approach the GTAA endeavoured to enable households living in bricks and mortar the opportunity to make their views known.
- 3.18 ORS do not make assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. We do not model need from households living in bricks and mortar.

Timing of the Fieldwork

- 3.19 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS aim to complete fieldwork during the non-travelling season, and to avoid days of known local or national events.
- 3.20 The fieldwork for this GTAA was completed between July 2024 and September 2024 and researchers were able to collect information on majority of residents living on sites or yards.

Our Analysis

Applying the PPTS Planning Definition

- ^{3.21} The primary change to the PPTS in December 2024 in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Wherever possible we use the data collected in household interviews to identify if they meet the planning definition. In some cases, information from planning applications and planning appeal Decision Notices is also used.
- ^{3.22} Through the inclusion of *all other persons with a cultural tradition of nomadism or of living in a caravan* in the Annex 1 definition this now includes all Travellers. There were no changes to the definition of Travelling Showpeople in Annex 1.

Dealing with Undetermined Households

- ^{3.23} A GTAA has to consider the needs of any households where it is not possible to determine if they meet the planning definition – usually because we have been unable to complete an interview. These are defined as undetermined households
- ^{3.24} Whilst there is no guidance that sets out how the needs of these households should be addressed ORS consider it necessary to estimate potential need from these households. This is an additional need figure over and above the need identified for households that meet the planning definition.
- ^{3.25} The estimate sought to identify potential current and future need from any pitches/plots known to be temporary or unauthorised; through modelling need from concealed-doubled-up households and from teenagers based on the outcomes from completed interviews; and through new household formation. As the demographics of the undetermined households are unknown, ORS use our national household formation rate of 1.50% in our analysis to estimate future need.
- ^{3.26} Following the changes to the planning definition in PPTS 2024 it has been assumed that all undetermined households will meet the definition. However, it is recommended that need from undetermined households is addressed through Criteria-Based Local Plan Policies and not through specific allocations.
- ^{3.27} The ORS approach to addressing the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex (29th June 2017). He concluded:

The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.

Calculating the Current and Future Need

- ^{3.28} To identify need, PPTS requires an assessment for current and future pitch requirements but does not provide a standard methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

- ^{3.29} Our desk-based research and fieldwork determines the vacant, and potentially available supply in the study area:
- » Current vacant pitches/plots.
 - » Pitches/plots currently with planning consent due to be developed within 5 years.
 - » Pitches/plots vacated by people moving to housing.
 - » Pitches/plots vacated by people moving from the study area (out-migration).
- ^{3.30} It is important when seeking to identify supply from vacant pitches/plots that they are in fact available for general occupation – i.e. on a public or social rented site/yard, or on a private site/yard that is run on a commercial basis with anyone being able to rent a pitch/plot if they are available. Typically, vacant pitches/plots on small private family sites/yards are not included as components of available supply but can be used to meet any current and future need from the family living on the site/yard.

Current Need

- ^{3.31} The second stage is to identify components of current need:
- » Households on unauthorised developments for which planning permission is not expected.
 - » Households living on sites/yards with temporary planning permission.
 - » Concealed, doubled-up or over-crowded households (including single adults).
 - » Teenage children in need of a pitch/plot of their own in the next 5 years.
 - » In-migration/roadside.
 - » Households in bricks and mortar needing to move to sites/yards.
 - » Households in need on waiting lists for public sites.
- ^{3.32} ORS are increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them displaced in-migration.

Future Need

- ^{3.33} The final stage is to identify components of future need. This includes the following components:
- » New household formation.

- ^{3.34} Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.

Pitch Turnover

- ^{3.35} Some assessments of need make use of pitch/plot turnover as an ongoing component of supply. ORS do not agree with this approach or with making any assumptions about annual turnover rates. ORS consider that this approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches/plots are not in fact available to meet any local need. The use of turnover has been the subject of a number of Inspectors Decisions, for example **APP/J3720/A/13/2208767** found a GTAA to be unsound when using turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- ^{3.36} In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers³ produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

- ^{3.37} As such, other than current vacant pitches/plots that are known to be available, annual pitch/plot turnover has not been considered as a formal component of supply in this GTAA. However, natural turnover of pitches/plots on public and private sites/yards should continue to be monitored by the Council. In particular, the natural turnover of pitches/plots can help to meet future need over time from new household formation.

Transit Provision

- ^{3.38} GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on sites/yards or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites/yards can be developed to accommodate Gypsies and Travellers as they move through different areas.

³ See www.londongypsiesandtravellers.org.uk/resources/ for details.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

- 3.39 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.
- 3.40 An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but usually has more limited facilities with typically only a source of water and chemical toilet disposal provided.
- 3.41 Another alternative is negotiated stopping. The term negotiated stopping is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not include permanent built transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the local authority and the (temporary) residents regarding expectations on both sides.
- 3.42 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.
- 3.43 The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable pitch is available for the caravan or each of the caravans on a relevant caravan site which is situated in the local authority's area (or within the county in two-tier local authority areas). Relevant sites need to be managed by a Local Authority or a Registered Social Landlord (RSL). The police have no powers to direct people to private transit sites or yards.
- 3.44 Consideration also has to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.
- 3.45 In order to investigate the potential need for transit provision when undertaking work to support the GTAA, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry for Housing, Communities and Local Government (MHCLG) Traveller Caravan Count. The outcomes of the Stakeholder Interviews with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES/YARDS AND POPULATION

Introduction

- 4.1 One of the main considerations of this GTAA is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 4.2 A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁴. A site is a collection of pitches which form a development for Gypsies and Travellers.
- 4.3 Whilst there is no standard size for a Gypsy and Traveller pitch, guidance⁵ recommends an average pitch size of 320m². However, it also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses for example) and can contribute to affordability.
- 4.4 For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically occupied by Travelling Showpeople.
- 4.5 Whilst there is also no standard size for a Travelling Showpeople plot, guidance⁶ recommends an average plot size of 2,000m². However, this should be viewed with some caution given the age of the guidance. In more recent years many Showpeople have sought to diversify their working practices and do not now need as much space for the storage or maintenance of larger rides. Recent planning applications in other local authorities have seen plans for new yards put forward including a variety of plot sizes.
- 4.6 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is a public residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.7 The alternative to a public residential site is a private residential site/yard for Gypsies, Travellers and Travelling Showpeople, respectively. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches/plots on existing private sites/yards.

⁴ Whilst it has now been withdrawn, Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

⁵ Leeds City Council: Gypsy and Traveller Site Design Guide (2020).

⁶ The Showmen's Guild: Travelling Showpeople's Sites – A Planning Focus (2007).

- 4.8 These two forms of accommodation are the equivalent to private ownership and private rent for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.9 The Gypsy, Traveller and Travelling Showpeople population also has other types of sites/yards due to its transient nature, as described more fully in Chapter 3. These are known as transit sites and they provide many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months.
- 4.10 An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities.
- 4.11 Both of these two types of transit provision are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel.
- 4.12 A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.13 Further occurrences for the Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Travellers and are usually referred to as roadside encampments.

Sites and Yards

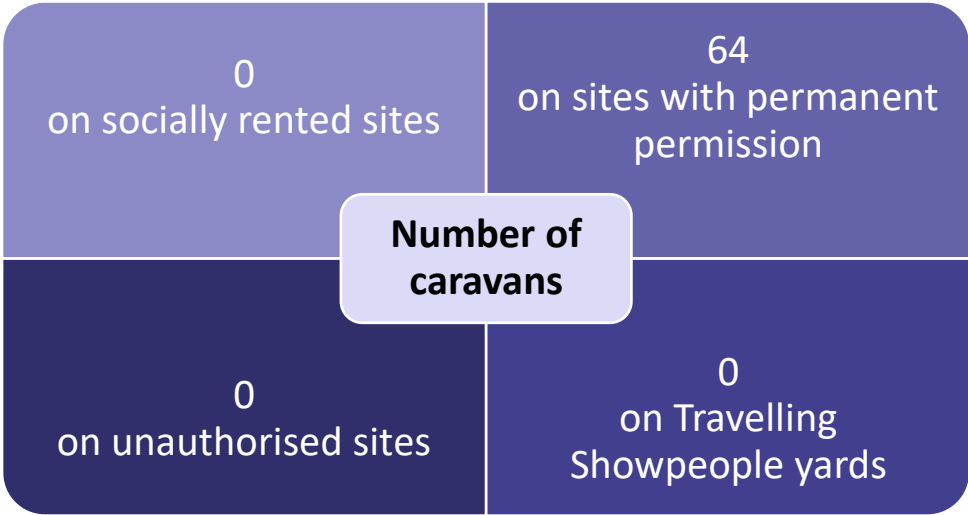
- 4.14 In the area on the base date for the GTAA, there were
- » 6 private sites with permanent planning permission (54 pitches);
 - » 5 Travelling Showmen's yard (37 plots).
- 4.15 See **Appendix B: Site and Yard List** for further details.

Figure 5 - Total amount of provision in Three Rivers (2025)

Category	Sites/Yards	Pitches/Plots
Gypsies and Travellers		
Public sites	0	0
Private sites with permanent planning permission	6	54
Private sites with temporary planning permission	0	0
Tolerated sites	0	0
Unauthorised sites	0	0
Public transit sites	0	0
Sub-Total	6	54
Travelling Showpeople		
Private yards	2	18
Tolerated yards	3	19
Unauthorised yards	0	0
Sub-Total	5	37
TOTAL	11	91

MHCLG Traveller Caravan Count

- ^{4.16} Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count⁷ which is conducted by each Local Authority in England on a specific date in January and July of each year⁸ and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England.
- ^{4.17} As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches/plots or resident households. The count is merely a ‘snapshot in time’ conducted by the Local Authority on a specific day, and any unauthorised sites/yards or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites/yards on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site/yard visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to support the identification of the need to provide for transit provision and this is set out later in this report.
- ^{4.18} The most recent Traveller Caravan Count (January 2025) reported the following:



⁷ The Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans in 2013

⁸ Only in January for Travelling Showpeople

5. STAKEHOLDER ENGAGEMENT

Introduction

- 5.1 ORS completed engagement with a range of stakeholders to complement the information gathered through interviews with members of the Travelling Community. This engagement took the form of telephone or Teams interviews.
- 5.2 The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- 5.3 A total of 3 interviews were undertaken with Council Officers and other local stakeholders from the study area.
- 5.4 In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from 7 neighbouring local authorities:
- » Buckinghamshire Council
 - » Dacorum Borough Council
 - » Hertsmere Borough Council
 - » London Borough of Harrow Council
 - » London Borough of Hillingdon Council
 - » St Albans City and District Council
 - » Watford Borough Council
- 5.5 Due to issues surrounding data protection, and to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

Views of Key Stakeholders and Council Officers

Accommodation Needs

- 5.6 Since the last GTAA, the Council have sought to address the low interview response rate achieved during the previous assessment.
- 5.7 The Council are aware of anecdotal evidence which suggests there is a need for extra pitches.

Short-term Encampments and Transit Provision

- 5.8 Only a small number of encampments occur in the area on an annual basis. Occurrences are sporadic throughout the year and attendance of family events is a very common reason for stopping in the area.
- 5.9 If necessary, the Council will issue enforcement notices to encampments.

Cross Border Issues

- ^{5.10} No cross-border issues with neighbouring authorities were identified.
- ^{5.11} The Council are in communication with Hertfordshire County Council on a regular basis regarding any issues relating to Travellers. Additionally, the Council also line of communication with neighbouring authorities should any issues that need addressing occur.

Future Priorities and Any Further Issues

- ^{5.12} A future priority for the Council is to find suitable locations to address any unmet need.

Neighbouring Authorities

- ^{5.13} Potential cross-border issues were raised by the following authorities:
- » Buckinghamshire Council
 - » London Borough of Hillingdon Council
 - » Watford Borough Council
- ^{5.14} Three Rivers District Council were made aware of all issues raised by each Council
- ^{5.15} The following authorities responded to indicate no potential cross-border issues:
- » Dacorum Borough Council
 - » Hertsmere Borough Council
 - » London Borough of Harrow Council
 - » St Albans City and District Council

6.SURVEY OF TRAVELLING COMMUNITIES

Interviews with Travellers

- 6.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area including efforts to engage with the bricks and mortar community.
- 6.2 At the base date for the GTAA there were 6 privately owned sites with permanent planning permission; 2 authorised Travelling Showmen's yards; and 3 tolerated Travelling Showmen's yards. See **Appendix B: Site and Yard ListB** for further details.
- 6.3 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 6 – Interviews completed in Three Rivers

Site/Yard Type	Pitches/Plots	Interviews	Reasons for not completing interviews/additional interviews
Gypsies and Travellers			
Private Sites			
Land adjacent 321B Uxbridge Road, Mill End	1	0	1x Site undeveloped
The Oaklands, Bedmond	24	24	-
Fir Trees, Sarratt	2	1	1x Storage
Little Lily, Kings Langley	9	1	3x No contact, 5x Undeveloped
Little Liz, Kings Langley	17	15	2x Non-Travellers
Keepers Cottage, Chorleywood	1	3	-
Sub-Total	54	44	
Travelling Showpeople			
Authorised			
Rear of 317-319 Uxbridge Road, Mill End	16	15	1 x Vacant
Rear of 321 Uxbridge Road, Mill End	2	2	
Tolerated	18	17	
Brickfield Farm, Carpenders Park	15	0	15 x Refusals
Meander, Sarratt	2	2	
Wood Yard, Sarratt	2	1	1 x No contact
Sub-Total	19	3	
TOTAL	91	64	

7.CURRENT AND FUTURE PITCH PROVISION

Introduction

- ^{7.1} This section focuses on the pitch/plot provision that is needed in the study area currently and to 2041. This includes both current unmet need and need which is likely to arise in the future⁹. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources.
- ^{7.2} We would note that this section is based upon a combination of the household interviews, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation but instead is used to validate information from planning records or other sources.
- ^{7.3} This section also identifies whether there is a need for any transit provision.

New Household Formation Rates

- ^{7.4} ORS prepared a Technical Note on Gypsy and Traveller Household Formation and Growth Rates in 2015 and updated it in 2020, and again in 2025. The main conclusions are set out here and the full paper is in **Appendix D**.
- ^{7.5} The Technical Note concludes that the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence for net Gypsy and Traveller population and household growth rates above 2.00% per annum.
- ^{7.6} In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers.
- ^{7.7} This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (**Ref: APP/F4410/W/15/3133490**) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

⁹ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

- 7.8 Another case was in relation to an appeal in Guildford that was issued in March 2018 (**Ref: APP/W/16/3165526**) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

Local Approach to New Household Formation Rates

- 7.9 This GTAA takes full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys. The baseline includes all current authorised households, all households identified as being in current need (including concealed/doubled-up households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- 7.10 Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence has been used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18.
- 7.11 However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.
- 7.12 The approach that has been applied in Three Rivers for this GTAA is set out below:
- » For Gypsies and Travellers who met the planning definition 41% of residents were aged under 18 so the ORS national formation rate of 1.50% has been uplifted to 1.70%.
 - » For Gypsies and Travellers who did not meet the planning definition there were very low numbers of children aged under 18 so household demographics have been used to determine formation.
 - » For Travelling Showpeople who met the planning definition there were no children aged under 18 other than 2 teenagers who have been identified as components of need so there is no further household formation.
 - » For Travelling Showpeople who did not meet the planning definition there were no children so there is no further household formation.
- 7.13 In addition, the ORS national rate of 1.50% has been used to estimate growth for undetermined Travellers.

- ^{7.14} It should also be noted that new household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch/plot in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

Breakdown by 5 Year Bands

- ^{7.15} In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches/plots, pitches/plots with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, net movement from bricks and mortar, and in-migration/roadside need) in the first 5 years. The total net new household formation is then split across the remaining GTAA period.

Household Planning Status

- ^{7.16} The table below sets out the planning status of households for the Three Rivers District Council GTAA. It is important to note that this table records numbers of households and not the number of pitches or plots.

Figure 7 – Planning status of households in Three Rivers

Status	Meet Planning Definition	Undetermined
Gypsies and Travellers		
Public Sites	0	0
Private Sites	53	3
Temporary Sites	0	0
Tolerated Sites	0	0
Unauthorised Sites	0	0
Roadside/In-Migration	3	0
B&M	0	0
Sub-Total	56	3
Travelling Showpeople		
Private Yards	20	0
Tolerated Yards	4	16
Unauthorised Yards	0	0
Roadside/In-Migration	0	0
B&M	0	0
Sub-Total	24	16
TOTAL	80	19

- ^{7.17} Figure 7 shows that for Gypsies and Travellers in Three Rivers, 56 households meet the planning definition of a Traveller, and 24 Travelling Showmen's households meet the planning definition.

- ^{7.18} It was not possible to make contact with 3 Gypsy and Traveller households and 16 Travelling Showmen's households during the fieldwork period as households either refused to take part in an interview or were not present during the fieldwork period. These households are recorded as Undetermined for the purposes of the GTAA.

Interviews with Gypsies and Travellers in Bricks and Mortar

- ^{7.19} Despite all of the efforts that were made it was not possible to identify and interview any households living in bricks and mortar.

Migration/Roadside

- ^{7.20} The study also sought to identify any need from households who have been forced to move from sites/yards due to overcrowding and who are currently living on the roadside or on sites/yards in other local authorities – and who have strong family links with households in Three Rivers. These are referred to as roadside households or displaced in-migration.
- ^{7.21} Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified 3 households living on roadside predominantly in Three Rivers with a need to move to a permanent pitch/plot in the area.
- ^{7.22} ORS have found no firm evidence from other local studies that have been completed recently of any households wishing to move to Three Rivers. Therefore, apart from the 3 households set out above, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch/plot requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- ^{7.23} It is important to note that any applications for new sites or additional pitches/plots as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

Public Sites

- ^{7.24} There are no public sites in Three Rivers.

Gypsy and Traveller Needs

Pitch Needs – Gypsies and Travellers that met the PPTS 2024 Planning Definition

^{7.25} Analysis of the household interviews indicated that there is a need from 14 pitches from concealed/doubled-up/over-crowded households; 4 pitches from a 5-year need from teenage children; 3 pitches from roadside/in-migration; and for 16 from new household formation. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller in Three Rivers is for 37 pitches over the GTAA period.

Figure 8 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition

Gypsy & Traveller – Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on pitches with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	14
5 year need from teenage children	4
Movement from bricks and mortar	0
In-Migration/Roadside	3
Households on waiting lists for public sites	0
Total Current Need	21
Future Need	
New household formation	16
<i>(Household base 57 and formation rate 1.7%)</i>	
<i>(Household base 6 and formation from demographics)</i>	
Total Future Need	16
Net Plot Need = (Current and Future Need – Total Supply)	37

Figure 9 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2025 – 29	21
6 – 10	2030 – 34	5
11 – 15	2035 – 39	7
16	2040 – 41	4
0 – 16	2025 – 2041	37

Pitch Needs – Undetermined Gypsies and Travellers

^{7.26} The assessment identified a need for up to 4 pitches for undetermined households. This is made up of a modelled need for 1 pitch for concealed or doubled-up households or single adults and a need for 3 pitches from new household formation from a maximum of 6 households using the ORS national formation rate of 1.50%.

Figure 10 – Need for undetermined Gypsy and Traveller households in Three Rivers

Gypsy & Traveller – Undetermined	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on pitches with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	1
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	1
Future Need	
New household formation	3
<i>(Household base 6 and formation rate 1.50%)</i>	
Total Future Need	3
Net Plot Need = (Current and Future Need – Total Supply)	4

Figure 11 – Need for undetermined Gypsy and Traveller households in Three Rivers by year periods

Year Period	Dates	Need
0 – 5	2025 – 29	1
6 – 10	2030 – 34	1
11 – 15	2035 – 39	1
16	2040 – 41	1
0 – 16	2025 – 2041	4

Travelling Showpeople Needs

Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition

- ^{7.27} Analysis of the household interviews indicated that there is a need from 4 plots from concealed/doubled-up/over-crowded households; 2 plots from a 5-year need from teenage children; and for 0 from new household formation. Therefore, the overall level of need for those households who met the planning definition of a Travelling Showperson in Three Rivers is for 6 plots over the GTAA period.

Figure 12 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition

Travelling Showpeople – Meeting Planning Definition	Plots
Supply of Plots	
Available supply from vacant public and private plots	0
Available supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on plots with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	4
5 year need from teenage children	2
Movement from bricks and mortar	0
In-Migration/Roadside	0
Total Current Need	6
Future Need	
New household formation	0
<i>(no Households Formation)</i>	
Total Future Need	0
Net Plot Need = (Current and Future Need – Total Supply)	6

Figure 13 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2025 – 29	6
6 – 10	2030 – 34	0
11 – 15	2035 – 39	0
16 – 20	2040 – 41	0
0 – 16	2025 – 2041	6

Plot Needs – Undetermined Travelling Showpeople

^{7.28} The assessment identified a need for up to 10 plots for undetermined households. This is made up of a modelled need for 3 plots for concealed or doubled-up households or single adults; a modelled need of 2 plots for teenagers; and a need for 5 plots from new household formation from a maximum of 21 households using the ORS national formation rate of 1.50%.

Figure 14 – Need for undetermined Travelling Showpeople households in Three Rivers

Travelling Showpeople – Undetermined	Plots
Supply of Plots	
Available supply from vacant public and private plots	0
Available supply from plots on new sites	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on plots with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	3
Movement from bricks and mortar	2
5 year need from teenage children	0
In-Migration/Roadside	0
Total Current Need	5
Future Need	
New household formation	5
<i>(Household base 21 and formation rate 1.50%)</i>	
Total Future Need	5
Net Plot Need = (Current and Future Need – Total Supply)	10

Figure 15 – Need for undetermined Travelling Showpeople households in Three Rivers by year periods

Year Period	Dates	Need
0 – 5	2025 – 29	5
6 – 10	2030 – 34	2
11 – 15	2035 – 39	2
16	2040 – 41	1
0 – 16	2025 – 2041	10

Transit Requirements

- ^{7.29} When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count; the outcomes of the stakeholder interviews; and local records on numbers of recorded encampments.

MHCLG Traveller Caravan Count

- ^{7.30} Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches/plots or resident households.
- ^{7.31} The count is also only a twice yearly (January and July) snapshot in time conducted by local authorities on a specific day, and any caravans on unauthorised sites/yards or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites/yards on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- ^{7.32} Data from the Traveller Caravan Count shows that there have been no unauthorised caravans on land not owned by Travellers recorded in the study area in recent years.

Stakeholder Interviews and Local Data

- ^{7.33} The outcomes of the Stakeholder Interviews were that only a small number of encampments occur in the area on an annual basis, and that these occurrences are sporadic throughout the year and attendance of family events is a very common reason for stopping in the area. If necessary, the Council will issue enforcement notices to encampments.

Transit Recommendations

- ^{7.34} Due to historic low numbers of encampments, it is not recommended that there is a need for additional formal public transit provision in Three Rivers at this time.
- ^{7.35} The situation relating to levels of unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information should be collected as part of a Welfare Assessment (or similar).
- ^{7.36} It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on an annual basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether the current approach is preferable.

- ^{7.37} In the short-term the Council should continue to use its current approach when dealing with encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- ^{7.38} The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- ^{7.39} Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

8.CONCLUSIONS

- 8.1 This GTAA provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the Housing and Planning Act 2016, Planning Practice Guidance 2021, Planning Policy for Traveller Sites 2024, and the National Planning Policy Framework 2024. It also provides an evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

- 8.2 In Three Rivers, for the GTAA period 2025 - 2041, there is a need for:
- » 37 pitches for Gypsy and Traveller households that meet the 2024 PPTS planning definition.
 - » 4 pitches for Undetermined Gypsy and Traveller households.
- 8.3 In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area. This guidance relates primarily to the provision of pitches on public sites but can also be more broadly applied to the provision of pitches on private sites.
- 8.4 Whilst there is no standard size for a Gypsy and Traveller pitch, Guidance¹⁰ recommends an average pitch size of 320m² but also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses) and can contribute to affordability.
- 8.5 For need arising from public sites the Council will need to consider the expansion or intensification of these sites, or for new sites(s), as it is unlikely that this need could be addressed through the provision of pitches on new private sites.
- 8.6 For need arising from private sites the Council will need to consider the expansion or intensification of these sites, or to address need through new site/pitch allocations. Where they have been identified the Council should also consider the regularisation of sites with temporary planning permission and of unauthorised sites.
- 8.7 The Council will also need to carefully consider how to address any potential needs from Undetermined households; from households seeking to move to Three Rivers (in-migration); or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Council should continue to use or put in place Criteria-Based Local Plan Policies as suggested in the PPTS.
- 8.8 Future need from new household formation could also be met through natural turnover of pitches over time, or through enforcing against any pitches not found to be occupied by Gypsies or Travellers.
- 8.9 Whilst the findings in this report are aggregated totals for the whole of Three Rivers due to data protection issues, the Council have more detailed data to enable an accurate review of Local Plan allocations to be made.

¹⁰ Leeds City Council: Gypsy and Traveller Site Design Guide (2020).

Travelling Showpeople

- 8.10 In summary, in Three Rivers, for the GTAA period 2025 - 2041, there is a need for:
- » 6 plots for Travelling Showpeople households that meet the 2024 PPTS planning definition.
 - » 10 plots for Undetermined Travelling Showpeople households.
- 8.11 In general terms need identified in a GTAA is seen as need for plots. Whilst there is no standard size for a Travelling Showpeople plot, guidance¹¹ recommends an average plot size of 2,000m². However, this should be viewed with some caution given the age of the guidance. In recent years many Showpeople have sought to diversify their working practices and many do not now need as much space for the storage and maintenance of larger rides. Recent planning applications in other local authorities have seen plans for new yards put forward including a variety of plot sizes.
- 8.12 For need arising from private yards the Council will need to consider the expansion or intensification of these yards, or to address need through new yard/plot allocations. Where they have been identified the Council should also consider the regularisation of yards with temporary planning permission and of unauthorised yards.
- 8.13 The Council will also need to carefully consider how to address any potential need from Undetermined households; from households seeking to move to Three Rivers (in-migration); or from households currently living in bricks and mortar who may wish to move to a yard. In terms of the Local Plan Policies, the Council should continue to use or put in place Criteria-Based Local Plan Policies as suggested in PPTS.
- 8.14 Future need from new household formation could also be met through natural turnover of plots over time, or through enforcing against plots not found to be occupied by Travelling Showpeople.
- 8.15 Whilst the findings in this report are aggregated totals for the whole of Three Rivers due to data protection issues, the Council have more detailed data to enable an accurate review of Local Plan allocations to be made.

Transit Provision

- 8.16 Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is a need for a formal public transit site in Three Rivers at this time.
- 8.17 It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 8.18 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

¹¹ The Showmen's Guild: Travelling Showpeople's Sites – A Planning Focus (2007).

Summary of Need to be Addressed – Gypsies and Travellers

- 8.19 Taking into consideration all of the elements of need that have been assessed in this GTAA, together with the assumptions on need from Undetermined households, the table below sets out the number of pitches that will need to be addressed.
- 8.20 Total need from Gypsy and Traveller households that meet the 2024 PPTS planning definition is for 37 pitches between 2025 and 2041, and total need from Undetermined households is for 4 pitches between 2025 and 2041.
- 8.21 The table below breaks total need down by:
- » Household that meet the planning definition.
 - » Undetermined households.
- 8.22 Need from households that meet the planning definition will need to be addressed through a Gypsy and Traveller Local Plan Policy through a combination of site/pitch allocations and through a Criteria-Based Local Plan Policy, and need from Undetermined households will have to be addressed through a Criteria-Based Local Plan Policy.

Figure 16 – Total Need for Gypsy and Traveller households

Year	2025 – 29	2030 – 34	2035 – 39	2040 – 41	2025 – 41
Meet Planning Definition (Allocations)	21	5	7	4	37
Undetermined (Criteria-Based Policy)	1	1	1	1	4
TOTAL	22	6	8	5	41

Summary of Need to be Addressed – Travelling Showpeople

- 8.23 Taking into consideration all of the elements of need that have been assessed, together with the assumptions on need from Undetermined households, the table below sets out the number of plots that will need to be addressed as a result of the outcomes of the GTAA.
- 8.24 Total need from Travelling Showpeople households that meet the 2024 PPTS planning definition is for 6 plots between 2025 and 2041, and total need from Undetermined households is for 10 plots between 2025 and 2041.
- 8.25 The table below breaks total need down by:
- » Household that meet the planning definition.
 - » Undetermined households.
- 8.26 Need from households that meet the planning definition will need to be addressed through a Travelling Showpeople Local Plan Policy through a combination of yard/plot allocations and through a Criteria-Based Local Plan Policy, and need from undetermined households will have to be addressed through a Criteria-Based Local Plan Policy.

Figure 17 – Total Need for Travelling Showpeople households

Year	2025 – 29	2030 – 34	2035 – 39	2040 – 41	2025 – 41
Meet Planning Definition (Allocations)	6	0	0	0	6
Undetermined (Criteria-Based Policy)	5	2	2	1	10
TOTAL	11	2	2	1	16

APPENDICES

Appendix A: Glossary of Terms / Acronyms Used

Glossary

Amenity block meaning a building where basic plumbing amenities are provided. This could include a bath, a shower, a WC and a sink.

Bricks and mortar is used to describe mainstream housing.

Caravan is used to describe mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.

Concealed household is used to describe households living within other households, who are unable to set up separate family units.

Doubling-Up refers to there being more than the permitted number of caravans on a pitch or plot.

Emergency Stopping Place is a temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

Green Belt refers to a land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; and to preserve the setting and special character of historic towns.

Household Formation is the process in which individuals form separate households. This is normally though adult children setting up their own household.

In-migration refers to movement of households into a region or community.

Local Plans are Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.

Out-migration refers to the Movement from one region or community in order to settle in another.

Pitch/plot is an area of land on a site or development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

Private site is an authorised site owned privately. This can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

Site refers to an area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans, chalets, or vehicles. Can contain one or multiple pitches or plots.

Social/Public/Council Site is an authorised site owned by either the local authority or a Registered Housing Provider.

Temporary planning permission refers to a private site with planning permission for a fixed period of time.

Tolerated site/yard refers to long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

Transit provision refers to a site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.

Unauthorised Development refers to caravans on land owned by Gypsies and Travellers and without planning permission.

Unauthorised Encampment refers to caravans on land not owned by Gypsies and Travellers and without planning permission.

Waiting list is a record held by the local authority or site managers of applications to live on a site.

Yard is a name often used by Travelling Showpeople to refer to a site.

Acronyms and Initials

GTAA	Gypsy and Traveller Accommodation Assessment
LPA	Local Planning Authority
MHCLG	Ministry for Housing, Communities and Local Government
NPPF	National Planning Policy Framework
ORS	Opinion Research Services
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
TSP	Travelling Showpeople

Appendix B: Site and Yard List

Site/Yard	Planning Status	Authorised	Unauthorised
Gypsies and Travellers			
Land adjacent 321B Uxbridge Road, Mill End, WD3 8DS	Private	1	-
The Oaklands, Bedmond Road, Bedmond, WD5 0QE	Private	24	-
Fir Trees, Dawes Lane, Sarratt, WD3 6BG	Private	2	-
Little Lily, Land rear of 59 Toms Lane, Kings Langley, WD4 8NT	Private	9	-
Little Liz, Old House Lane, Kings Langley, WD4 8RS	Private	17	-
Keepers Cottage, Solesbridge Lane, Chorleywood, WD3 6AA	Private	1	-
Total Pitches		54	0
Travelling Showpeople			
Rear of 317-319 Uxbridge Road, Mill End, WD3 2DS	TSP - Private	16	-
Rear of 321 Uxbridge Road, Mill End, WD3 8DS	TSP - Private	2	-
Brickfield Farm, Oxhey Lane, Carpenders Park, WD19 5RF	TSP - Tolerated	15	-
Meander, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP - Tolerated	2	-
Wood Yard, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP - Tolerated	2	-
Total Plots		37	0
TOTAL		91	0

Appendix C: Household Interview Questionnaire



GYPSY, TRAVELLER & TRAVELLING SHOWMEN ACCOMMODATION NEEDS ASSESSMENT

Site/yard code

Pitch/plot no.

Pitch/plot location

INTERVIEWER INSTRUCTIONS:

This questionnaire should be used to record information about households that have been interviewed, either with a structured interview (where questions were asked as they are written on the questionnaire) or a semi-structured interview (where the information was gathered through discursive conversation).

Whilst not all households will be prepared to answer every question, it is important to record as much information as possible; but any information that can be provided will be used to inform the assessment. For all questions, you may prompt respondents with the available options as necessary. Please use the "Further Information and Notes" pages towards the end of the form to record any other details that could be relevant to the assessment.

If respondents provide information about other households either living on this site/yard or elsewhere, a separate Proxy Questionnaire should be used to record the information about each additional household.

INTERVIEWER: READ OUT

Good morning/afternoon/evening. My name is < > and I work for Opinion Research Services (ORS).

The Council is undertaking a Gypsy, Traveller and Travelling Showmen accommodation needs assessment in this area. They have asked ORS to try and contact every household from the Travelling Community living in their area to make sure that the needs assessment is accurate.

This important survey collects information about your accommodation on this site/yard, your own needs and needs of other members of your household, and details about your travelling. The information that you provide will help the Council better understand the accommodation needs of the Travelling Community. It will make sure that needs are properly assessed based on accurate and up-to-date information, so that the needs of every household get counted. The interview should take no more than 20 minutes, and any information that you provide will be treated in strict confidence; so I hope that you will take part.

INTERVIEWER: READ OUT IF NECESSARY

Only ORS will see your individual answers, the information will be kept secure and confidential and only anonymised data will be sent to the Council. Any information that you provide will be processed by ORS in line with the requirements of the UK Data Protection Act and the EU General Data Protection Regulation (GDPR). For more information, please go to www.ors.org.uk/privacy

If you would like to confirm my identity, you can contact ORS on Freephone 0800 078 9786. If you would like to confirm that ORS is a genuine research practice, you can contact the Market Research Society on Freephone 0800 975 9596.

YOUR CURRENT ACCOMMODATION

Q1. Are you and your household...?

INTERVIEWER: READ OUT. CROSS ALL THAT APPLY

- Romany Gypsy
- Irish Traveller
- English Traveller
- Scottish Gypsy or Traveller
- Welsh Gypsy
- Travelling Showman
- New Traveller
- Non-Traveller
- Prefer not to say

Q2a. How long have you lived on this site/yard?

- Less than 12 months
- 12 months but less than 2 years
- 2 years but less than 5 years
- 5 years or longer → GO TO QUESTION 3
- No answer

Q2b. Where did you previously live?**Q3a. Is this site/yard your permanent base?**

- Yes → GO TO QUESTION 4
- No
- No answer

Q3b. If not, where is your permanent base?**Q4. Does your household own this site/yard or do you rent your pitch/plot?**

- Own the site/yard
- Privately rent the pitch/plot
- Public rent the pitch/plot
- Housing Association rent the pitch/plot
- No answer

Q5a. Is this site/yard suitable for the needs of your household?

- Yes → GO TO QUESTION 6
- No
- No answer

Q5b Why do you feel that it isn't suitable?

Q6a. Do you plan to move from this site/yard within the next five years?

- Yes
- No → GO TO QUESTION 7
- No answer

Q6b Why do you plan to move?**Q6c. Where do you plan to live after you have moved?**

- Elsewhere in this council area
- Another council area *WRITE IN*

- No answer

Q6d. Would you prefer to...?

- Buy a site/yard or a private pitch/plot
- Rent on a private site/yard
- Rent on a public site
- Live in Bricks and Mortar
- No answer

TRAVELLING

Q7a. Have you or any other members of your household ever travelled away from your permanent base?

- Yes
- No → GO TO QUESTION 10
- No answer

Q7b. How many trips has your household made over the last 12 months?**Q8. What are/were the reasons for travelling from your permanent base?**

- To work, including working/trading at fairs
- Visiting fairs, but not to work
- Visiting family or friends
- Holiday
- Other reasons
- No answer

INTERVIEWER: PROBE FULLY AND PROVIDE FURTHER DETAILS BELOW*If travelling for work, write in profession or trade, including frequency and length of trips**If travelling for fairs or other reasons, confirm if this involved any elements of work, and record nature of work undertaken*

Please write in and continue in Notes section as necessary

Q9. Where do you usually stay?**INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- Council transit sites
- Private transit sites
- On the roadside
- With family or friends
- Other WRITE IN
- No answer

Q10. What are the main reasons for your household not travelling anymore?**INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- Settled now
- Children in school
- Ill health
- Old age
- Nowhere to stop
- No work opportunities
- Other reasons → PROVIDE DETAILS IN NOTES
- No answer

Q11a. Do you or any other members of your household plan to travel in future?

- Yes
- No → GO TO QUESTION 12
- No answer

Q11b. What will be the reasons for travelling?**INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- To work, including working/trading at fairs
- Visiting fairs, but not to work
- Visiting family or friends
- Holiday
- Other reasons
- No answer

HOUSEHOLD DETAILS

Q12. How many people are in your household, and how many separate families are there?
Please count everyone that normally lives on this pitch/plot, including yourself.

number of people

number of families

For each person in your household please answer the following questions

Q13a What is their relationship to you

- Husband, wife or partner
- Son or daughter (inc. step-children)
- Brother or sister (inc. step-siblings)
- Mother or father (inc. step-parents)
- Grandchild
- Grandparent
- Relation - other
- Unrelated

Q13b. What is their gender

- Male
- Female
- Prefer not to say

Q13c. What was their age last birthday

--

Q13d. Have they travelled away to work in the last 12 months

- Yes
- No

Q13e. Do they plan to travel away to work any time in the future

- Yes
- No

Repeat for each household member

ACCOMODATION NEEDS

Q14a. If anyone currently living with you needs their own separate accommodation, how many pitches/plots are needed for them now, and how many will be needed within the next five years?

pitches/plots for adults needed now

pitches/plots for adults needed within 5 years

pitches/plots for 13-17 year olds needed within 5 years

Q14b. Would they want to stay on this site/yard?

- Yes
- No – want to live elsewhere in this council area
- No – want to move to another council area
- No answer

Q15. Do you have any children or other family that are not currently living with you who need their own separate accommodation?

- Yes → PROVIDE DETAILS IN NOTES
- No
- No answer

Q15b How many pitches/plots would they need?

Q15c. Would they want to move to this site/yard?

- Yes
- No – want to live elsewhere in this council area
- No – want to move to another council area
- No answer

Q16. If separate accommodation was needed on this site/yard, would there be...?

INTERVIEWER: READ OUT. CROSS ONE BOX ONLY

- Space available on the existing site/yard
- Potential to extend the boundary of the site/yard
- Need for space on another local site/yard
- No answer

Q17a. Do you own or are you aware of any land that has potential for new pitches/plots?

- Yes
- No → GO TO QUESTION 18
- No answer

Q17b. Where is the land and who owns it?**Q18a. Do you have any family or friends, or know anyone from the Travelling Community currently living in Bricks and Mortar who we should contact for this study?**

- Yes
- No → GO TO FURTHER INFORMATION
- No answer

Q18b Can you provide contact details for them?

INTERVIEWER: IF DETAILS REFUSED, READ OUT

If you aren't able to provide their details, please ask them to call ORS on Freephone 0800 078 9786 to make sure that their needs are counted

FURTHER INFORMATION AND NOTES

Is there anything else you'd like to tell us about this site/yard, your travelling patterns and any future plans to travel, or the accommodation needs of you and your household?

Appendix D: Household Formation Rates

ORS Technical Note: Gypsy and Traveller Household Formation and Growth Rates

January 2025



Opinion Research Services, The Strand, Swansea SA1 1AF

Enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

© Copyright 2025

The below copyrights acknowledge the open-source data that is provided by the respective bodies and is used throughout this document

May contain Ordnance Survey data © Crown copyright and database right 2024

May contain Royal Mail data © Royal Mail copyright and database right 2024

May contain National Statistics data © Crown copyright and database right 2024

May contain public sector information licensed under the Open Government Licence v3.0

TABLE OF CONTENTS

INTRODUCTION.....3
Abstracts and Conclusions..... 3
Introduction..... 3

MODELLING POPULATION AND HOUSEHOLDE GROWTH RATES4
Migration Effects 4
Population Profile..... 4
Birth and Fertility Rates..... 5
Death Rates 6
Modelling Outputs 6
Household Growth 6

CONCLUSIONS.....9

1. INTRODUCTION

Abstract and Conclusions

- ^{1.1} National and local household formation and growth rates are important components of Gypsy and Traveller Accommodation Assessments (GTAAAs), but until 2013 little detailed work had been done to assess their likely scale. ORS undertook work in 2013 to assess the likely rate of demographic growth for the Gypsy and Traveller population and concluded that the figure could be as low as 1.25% per annum, but that best available evidence supports a national net household growth rate of 1.50% per annum.
- ^{1.2} This analysis was produced as a separate document in 2013 and then updated in 2015 and 2020 in light of comments from academics, planning agents and local authorities.
- ^{1.3} This current document represents an update to our findings in 2020 to consider the impact of the data from the 2021 UK Census of Population. This shows little change from the 2011 Census, so there is no change in the overall conclusions that support a national net household growth rate of 1.50% per annum.

Introduction

- ^{1.4} Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher gross household formation rates.
- ^{1.5} However, while their gross rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing.
- ^{1.6} Therefore, the net rate of household growth is the gross rate of formation minus any reductions in households due to such factors.

2. MODELLING POPULATION AND HOUSEHOLD GROWTH RATES

- ^{2.1} The basic equation for calculating the rate of Gypsy and Traveller population growth is relatively simple: start with the base population and then calculate the average increase/decrease by allowing for births; deaths; in-/out-migration; and household dissolution.
- ^{2.2} Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context in 2013, ORS modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates. To do so, we supplemented the available national statistical sources with data derived from our own surveys.

Migration Effects

- ^{2.3} Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration.
- ^{2.4} It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents.

Population Profile

- ^{2.5} The main source for the rate of Gypsy and Traveller population growth is the UK 2011 and 2021 Censuses. This is due to the ethnicity question in the 2011 Census having a new option included, 'Gypsy and Irish Traveller' was added as a specific category and this option was repeated in the 2021 Census.
- ^{2.6} While non-response bias probably means that the size of the population was underestimated, the age profile the 2011 and 2021 Censuses provide is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
- ^{2.7} The 2011 Census gave a total population of 54,895 in England, while the 2021 Census shows a population of 67,690, which represents a 23% increase.
- ^{2.8} However, this is measuring a mixture of real population growth and greater compliance with the Census in 2021. In reality, the true population of Gypsies and Travellers in England is likely to be 200,000-250,000, so both numbers are just a sample of the overall population.
- ^{2.9} Comparing the 2011 and 2021 Census datasets, the share of the population aged under 16 years has fallen from 31.8% to 30.5%, while the share aged 65 years or more has risen from 3.7% to 4.9%. The older population is still likely to be an under-estimate, but the results are consistent with the pattern seen in almost all population in England of falling birth rates and rising life expectancy.

Figure 1 – Age Profile for the Gypsy and Traveller Community in England 2011 and 2021
(Source: UK Census of Population 2011 and 2021)

Age Group	People 2021	Cumulative % 2011	People 2021	Cumulative % 2021
Age 0 to 4	5,725	10.4	6,535	9.7
Age 5 to 7	3,219	16.3	3,947	15.5
Age 8 to 9	2,006	19.9	2,547	19.2
Age 10 to 14	5,431	29.8	6,404	28.7
Age 15	1,089	31.8	1,212	30.5
Age 16 to 17	2,145	35.7	2,383	34.0
Age 18 to 19	1,750	38.9	2,107	37.1
Age 20 to 24	4,464	47.1	5,074	44.6
Age 25 to 29	4,189	54.7	4,889	51.9
Age 30 to 34	3,833	61.7	5,189	59.5
Age 35 to 39	3,779	68.5	4,611	66.3
Age 40 to 44	3,828	75.5	4,386	72.8
Age 45 to 49	3,547	82.0	3,982	78.7
Age 50 to 54	2,811	87.1	3,875	84.4
Age 55 to 59	2,074	90.9	3,196	89.1
Age 60 to 64	1,758	94.1	2,423	92.7
Age 65 to 69	1,215	96.3	1,638	95.1
Age 70 to 74	905	97.9	1,432	97.3
Age 75 to 79	594	99.0	882	98.6
Age 80 to 84	303	99.6	552	99.4
Age 85 and over	230	100.0	426	100.0
Total	54,895		67,690	

Birth and Fertility Rates

- ^{2.10} The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 9.7% of the Gypsy and Traveller population – which means that, on average, 1.9% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 28.7% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year.
- ^{2.11} The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood.
- ^{2.12} ORS know of only one estimate of fertility rates of the UK Gypsy and Traveller community, in *'Ethnic identity and inequalities in Britain: The dynamics of diversity'* by Dr Stephen Jivraj and Professor Ludi Simpson (published May 2015). The authors use the 2011 Census data to estimate the TFR for the Gypsy and traveller community as 2.75.

- ^{2.13} ORS have used our own historic survey data to investigate the fertility rates of Gypsy and Traveller women. The ORS data shows that on average Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFR's were not completed).
- ^{2.14} On this basis it is reasonable to infer an average of 3 children per woman during their lifetime, which is broadly consistent with the estimate of 2.75 children per woman derived from the 2011 Census. The 2021 Census data is fully consistent with these estimates, so no changes are required to the modelling, but the evidence that the TFR could be falling should be monitored over time.

Death Rates

- ^{2.15} Although the above data implies an annual growth rate through births of about 2%, the death rate must also be considered. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) *'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative'*, University of Sheffield).
- ^{2.16} Therefore, our population growth modelling in 2013 ORS used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 Census (and also in ORS's own survey data).
- ^{2.17} Again, this data is fully consistent with the 2021 Census, which may be showing slight increases in life expectancy, but not sufficient to be inconsistent with the 2013 modelling.

Modelling Outputs

- ^{2.18} If a TFR of 3 and an average life expectancy of 72 years are assumed for Gypsies and Travellers, then the ORS modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum.
- ^{2.19} If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.50% per annum. To generate an 'upper range' rate of population growth, ORS assumed an implausible TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.90% per annum.
- ^{2.20} Given the data from the 2021 Census, the figure of 1.25% net population growth appears to be consistent with around 2% of the population being born each year and deaths accounting for around a 0.75% reduction in population.

Household Growth

- ^{2.21} In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller childless or single person households.

- ^{2.22} Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.25%-1.50% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households' form.
- ^{2.23} However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
- ^{2.24} Based on the 2011 and 2021 Census, the tables below compare the age of household representatives in all households in England with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general England population in 2021, 2.7% of household representatives are aged 16-24, compared with 7.4% in the Gypsy and Traveller population, which is consistent with ORS's survey data.
- ^{2.25} Interestingly, in 2011, 8.7% of all Gypsy and Traveller households were aged under 25 years, but this has fallen to 7.4% in 2021. This is in line with a fall in the general population from 3.6% to 2.7%, which implies households are forming at an older age. This in turn would mean that any population growth would convert to a lower household growth as the growing population forms households at an older age.

Figure 2 – Age of Head of Household in 2011 (Source: UK Census of Population 2011)

Age of Household Representative	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
Total	22,063,368	100%	19,458	100%

Figure 3 – Age of Head of Household in 2021 (Source: UK Census of Population 2021)

Age of Household Representative	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Age 24 and under	608,361	2.7%	1,537	7.4%
Age 25 to 34	3,067,607	13.7%	4,278	20.6%
Age 35 to 49	5,886,110	26.2%	6,790	32.8%
Age 50 to 64	6,470,425	28.8%	5,318	25.7%
Age 65 and over	6,427,165	28.6%	2,807	13.5%
Total	22,459,668	100%	20,730	100%

- ^{2.26} The following tables shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents and fewer couples without children, amongst Gypsies and Travellers children. This was the case in both 2011 and 2021.

Figure 4 – Household Type in 2011 (Source: UK Census of Population 2011)

Household Type	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no dependent children	7,024,688	31.8%	3,167	16.3%
Couple with dependent children	4,266,670	19.3%	3,683	18.9%
Lone parent with dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
Total	22,063,368	100%	19,458	100%

Figure 5 – Household Type in 2021 (Source: UK Census of Population 2021)

Household Type	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Single person	6,964,704	30.3%	6,264	28.8%
Couple with no dependent children	7,806,819	34.0%	4,411	20.3%
Couple with dependent children	4,662,429	20.3%	4,500	20.7%
Lone parent with dependent children	1,773,926	7.7%	4,634	21.3%
Lone parent: All children non-dependent	1,058,017	4.6%	1,269	5.8%
Other households	725,107	3.2%	689	3.2%
Total	22,991,002	100%	21,767	100%

- ^{2.27} The key point, though, is that since 21% of Gypsy and Traveller households are lone parents with dependent children, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates.
- ^{2.28} While there are differences with the general population, a 1.25%-1.50% per annum Gypsy and Traveller population growth rate is likely to lead to a household growth rate of 1.25%-1.50% per annum.

3. CONCLUSIONS

- 3.1 The best available evidence suggests that the net annual Gypsy and Traveller household growth rate across England is 1.50% per annum. This figure was originally derived from the 2011 UK Census of Population and ORS's own survey but is also fully consistent with the 2021 UK Census of Population.
- 3.2 However, whilst a national rate of 1.50% can be demonstrated, this should be adjusted accordingly to establish local rates based on the demographic breakdown of the population at a local authority level.
- 3.3 Evidence from previous GTAA studies completed by ORS suggest that locally derived rates can vary from 0.50% to 2.75% depending on the number of children aged under 18 in the local Traveller population.
- 3.4 In addition, in certain circumstances where the numbers of households and children are higher or lower than national data has identified, or the population age structure is skewed by certain age groups, it may not be appropriate to apply a percentage rate for new household formation.
- 3.5 In these cases, a judgement should be made on likely new household formation based on the age and gender of the children identified in local household interviews. This should be based on the assumption that 50% of households likely to form will stay in any given area and that 50% will pair up and move to another area, while still considering the impact of dissolution. This is based on evidence from over 170 GTAAs that ORS have completed across England and Wales involving over 7,000 household interviews.

This page is intentionally left blank

Three Rivers District Council

Local Plan Sub-Committee Report

25 November 2025

PART I

**LOCAL PLAN – PART 5 ‘NEWLY SUBMITTED SITES AND NEW POLICIES’
CONSULTATION SUMMARY**

1 Summary

- 1.1 This report provides a summary of the Regulation 18 consultation on the Council's Newly Submitted Sites and New Policies (Part 5).

2 Introduction

- 2.1 From 16 July to 31 August 2025 the Council consulted on newly submitted sites and new policies. This concluded its Regulation 18 stage consultations. We are now working towards the Regulation 19 'Publication' stage of Local Plan preparation.

Prior to the 2025 consultation, TRDC undertook four Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

- Local Plan 'Issues & Options and Call for Sites Consultation Document', July 2017
- Local Plan "Preferred Policy Options" (Part 1) and "Sites for Potential Allocation (Part 2)" Document, June 2021
- Local Plan "Additional Sites for Potential Allocation" (Part 3), January 2023
- Local Plan "Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land" (Part 4)

3 Background

- 3.1 Full Council in December 2024 adopted an updated Local Development Scheme (LDS) setting out the timetable for Local Plan preparation. This new LDS set out expected Regulation 19 publication of the Local Plan in February / March 2026. It was agreed to complete additional evidence work to bring the local plan in line with changes to national planning policy.
- 3.2 An extraordinary Full Council in January 2025 resulted in Members requesting an accelerated timetable to publish the Regulation 19 plan in early November 2025.
- 3.3 This additional evidence work included a call for sites to ensure that we had considered all of the suitable and available site options going forwards. As a result of this call for sites over 30 new sites were submitted, which are currently being assessed as part of the Strategic Housing and Employment Land Availability Assessment.

- 3.4 It was officers' view that the council could proceed straight to Regulation 19 publication of the plan without further Regulation 18 consultation as the council had already consulted on different levels of growth through its previous Regulation 18 consultations, and its approach to delivering that growth had not changed. However, as it had not consulted on the individual new sites submitted from the call for sites, officers suggested seeking Counsel advice on whether to proceed straight to Regulation 19 publication or whether to undertake a further round Regulation 18 consultation.
- 3.5 Considering Counsel advice, officers recommended undertaking an additional Regulation 18 consultation on the newly submitted sites. Although officers understand that there is no requirement to consult on individual new sites at Regulation 18 stage, it was clear from Counsel advice there is a risk of the plan being found unsound at examination if a Regulation 18 consultation on these sites was not completed.
- 3.6 It is imperative that the Council reduces the risk of the plan being found unsound at every opportunity. Should the Local Plan be found unsound at examination this would result in further work on the plan being required. The costs of examination can run into the hundreds of thousands of pounds, so if the plan is found unsound this money is effectively wasted and we would have to incur those costs again to bring a new plan to examination at a later date. It would also lead to delays (18 months to two years) in the plan being adopted as further evidence work and consultation would be required before a new plan can be brought to examination. This would increase the period of time the Council is susceptible to speculative planning applications being successful at appeal.
- 3.7 The additional Regulation 18 consultation included the newly submitted sites that the council considered deliverable (suitable and available) seeking views on them, as well as those that it does not consider deliverable.

Regulation 18 Part 5 Newly Submitted Sites and New Policies Consultation Summary

- 3.8 A detailed summary of the consultation can be viewed in Appendix 1 to this report. A few of the key points from the summary report will be covered in the forthcoming paragraphs.
- 3.9 A total of 7,448 formal responses were received from 592 respondents. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations. 984 responses were received by post or email and 6,464 responses were received through the online consultation form (Have Your Say).
- 3.10 In terms of demographics, there was a large generational disparity between respondents. Well over half of all public responses (from Have Your Say) came from those born prior to 1970 and as few as 23 respondents came from those born after 1990. It is clear that further efforts need to be made to encourage young people to comment given that they may have differing viewpoints and priorities. We will continue to endeavour to engage more young people and other hard to reach groups going forwards.
- 3.10.1 Have Your Say respondents were also asked what the beginning of their postcode was to ascertain which specific areas in the district responses were coming from. Additionally, to be accepted letters and emails had to include the address of the respondent. As set out in Figure 9 below, the area with the largest number of

responses was Chorleywood, with a total of 135. Rickmansworth and Carpenders Park also provided a high number of responses with 86 and 99 respectively. A total of 58 responses originated from outside of the district.

3.11 Statutory Consultee Responses

3.12 Statutory consultees include Hertfordshire County Council, HWE ICB, National Highways, the Environment Agency and Historic England. Many of these responses were specific to certain policies and sites. A full and in-depth summary of Consultee Responses can be found in Appendix 1.

3.13 Landowner/Promoter Responses

3.14 A full summary of Landowner and Promoter Responses can be found in Appendix 1. A number of key themes are summarised below.

3.15 The main concerns raised in relation the policies were the challenges regarding not following the 2023 Written Ministerial Statement in terms of net-zero. Additionally, many responses were concerned with viability of the plan in terms of meeting the required housing targets.

3.16 Landowners and Promoters generally did not respond to the sites section of the consultation.

3.17 Public Responses

3.18 A full summary of Public Responses can be found in Appendix 1. A number of key themes are summarised below.

3.19 Public responses were generally supportive of all the policies with all receiving more 'yes' responses than 'no' when asking if they were correct approach. Public responses often mentioned the importance of protecting the environment and fighting climate change.

3.20 In terms of sites, a vast majority of public responses were in favour of protecting the Green Belt and many specifically mentioned the loss of open space, impact on wildlife and loss of rural character. Many also mentioned the lack of infrastructure including highways, transport, schools, medical facilities and sewage. Most sites received more 'no' responses to whether they were considered to be suitable. The three sites that received more 'yes' responses than 'no' were NCFS15 Chorleywood Library, NCFS26 Meresworth Care Home, Field Way and NCFS34 Pinewood Lodge.

4 Recommendation

4.1 That the Local Plan Sub Committee:

- Note the contents of the report

Report prepared by: Michael Davey, Planning Policy Officer

Background Papers

Appendix 1 – Summary of the Three River's Local Plan Newly Submitted Sites and New Policies (Part 5) Regulation 18 Consultation

National Planning Policy Framework (2024)
Regulation 18 Part 1: Preferred Policy Options (2021)
Regulation 18 Part 2: Sites for Potential Allocation (2021)
Regulation 18 Part 3: Additional Sites for Potential Allocation (2023)
Regulation 18 Part 4: Lower Housing Growth Option (2023)
Potential Sites consultation (2018)
Regulation 18 Part 5: Newly Submitted Sites and New Policies (2025)
Regulation 18 Issues & Options consultation (2017)



Local Plan

Summary of the Three Rivers' Local Plan Newly Submitted Sites and New Policies (Part 5) Regulation 18 Consultation

November 2025

Table of Contents

1. Introduction
2. Previous Regulation 18 Consultations
3. Newly Submitted Sites and New Policies Regulation 18 Consultation (July – August 2025)
4. Potential Updates Following the Regulation 18 Consultation

Introduction

- 1.1 Three Rivers District Council (TRDC) is preparing a new Local Plan, which will eventually replace the current Core Strategy (2011), Development Management Policies LDD (2013) and Site Allocations LDD (2014).
- 1.2 In July 2025, TRDC undertook the “Three Rivers’ Local Plan Regulation 18 Newly Submitted Sites and New Policies Consultation”.
- 1.3 This statement summarises the consultation including how we consulted, who was invited to make representations, the comments that were received and the concerns raised, all of which have influenced the preparation of the emerging Local Plan.

2.0 Previous Regulation 18 Consultations

- 2.1 Prior to the 2025 consultation, TRDC undertook four Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:
 - Local Plan ‘Issues & Options and Call for Sites Consultation Document’, July 2017
 - Local Plan “Preferred Policy Options” (Part 1) and “Sites for Potential Allocation (Part 2)” Document, June 2021
 - Local Plan “Additional Sites for Potential Allocation” (Part 3), January 2023
 - Local Plan “Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land” (Part 4)

3.0 Three Rivers’ Local Plan Newly Submitted Sites and New Policies (Part 5) Regulation 18 Consultation.

- 3.1 The consultation methods adopted by the Council were in accordance with the Councils Statement of Community Involvement, (June 2021).
- 3.2 The consultation ran from Wednesday 16 July 2025 for a period of six weeks, ending on Sunday 31 August 2025. Emails were sent to almost 1300 people and organisations registered on the local plan consultation database, including statutory consultees, site owners and developers, and members of the public. The consultation was advertised in the Watford Observer and online through the Three Rivers District Council website and social media. For the first time in the process of making the new Local Plan, the Have Your Say platform was used, and the majority of responses were received through this form. A small number of letter and email comments were also received.
- 3.3 A total of 7448 formal responses were received from 592 respondents (53 Statutory and Non-Statutory Consultees, 17 Landowners/Developers and 522 general public) through the sites section of the consultation. A total of 449 formal responses were received from 73 respondents (19 Statutory and Non-Statutory Consultees, 5 Landowners/Developers and 49 general public) through the policy section of the consultation. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations. 984 responses were received by post or email and 6,464 responses were received through the online consultation form.

3.4 Public Respondents

3.5 Within the Have Your Say platform, public respondents were asked a series of optional questions to help to understand the demographic makeup of respondents. It is important to note that representations sent via email and letters did not contain demographic information.

3.5.1 The 'about me' section (see Figures 1 and 2 below) indicated that a large majority of respondents using the Have Your Say platform were residents in the Three Rivers District. A large amount were also those that own a property in Three Rivers while there were a smaller number of those who own a business, worked or were a student in the area.

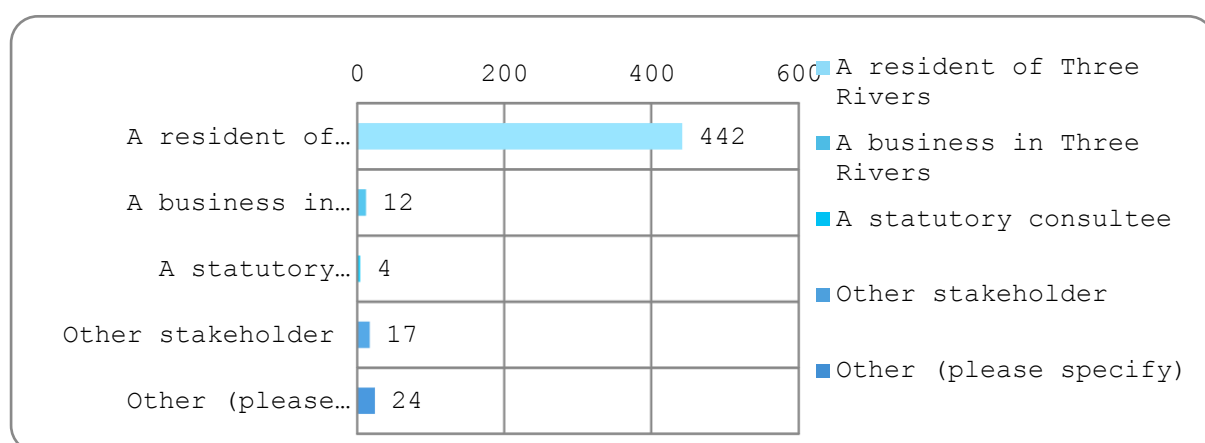


Figure 1. Sites: Summary of "about me" section within the Have Your Say platform

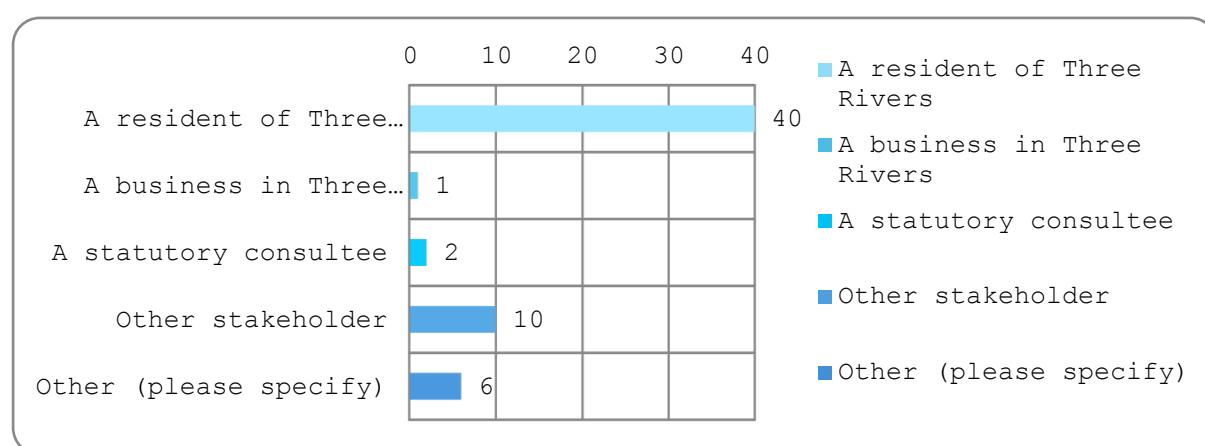


Figure 2. Policies: Summary of "about me" section within the Have Your Say platform

3.5.2 In terms of age, respondents (from Have Your Say) by decade born shows a large generational disparity between respondents (see Figures 3 and 4 below). Well over half of all public responses (from Have Your Say) came from those born prior to 1970 and as few as 23 came from those born from 1990 onwards. For the sites section of the consultation, the largest group was those born between 1950 and 1959 with a total of 117. For the policies section of the consultation, the largest group was those born between 1960 and 1969 with a total of 21. It is evident from Figures 2 and 3 that there has been a lack of engagement from young people and further efforts need to be made to encourage young people to comment, given that they may have differing viewpoints and priorities.

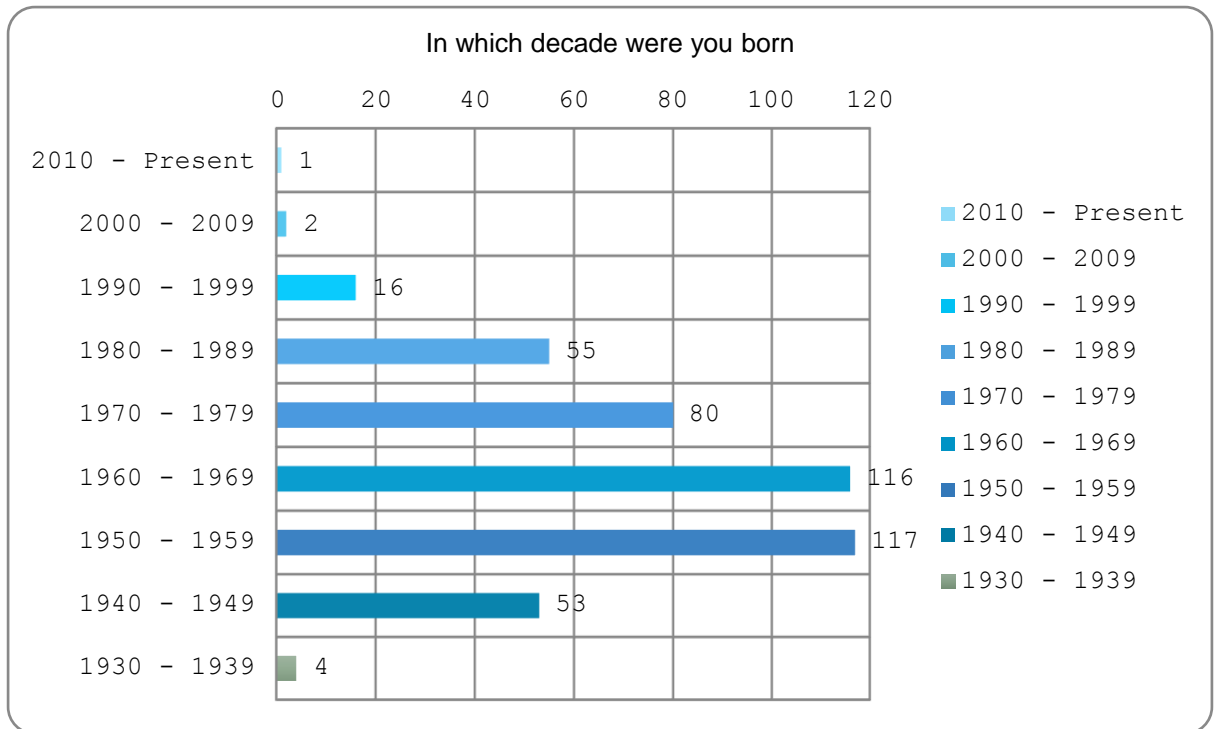


Figure 3. Sites: Summary of the decades in which the Have Your Say respondents were born

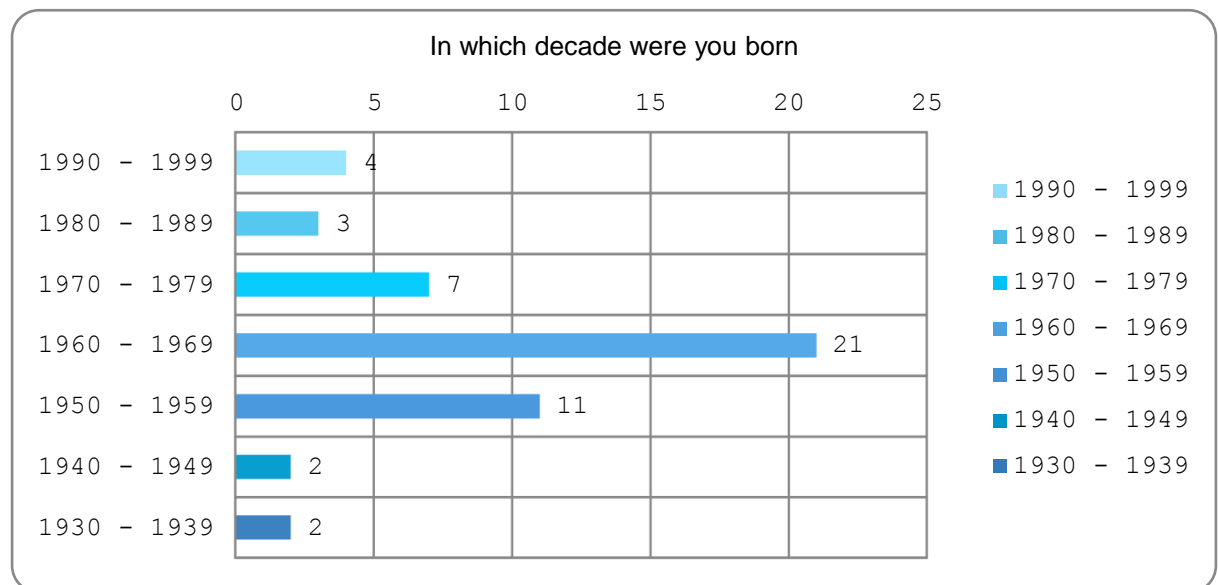


Figure 4. Policies: Summary of the decades in which the Have Your Say respondents were born

3.5.3 In terms of gender, the majority of respondents identified as a man, while there were 15 fewer responses for the Sites section and 6 fewer responses for the Policies section from those who identified as a woman (see Figure 5 and 6 below).

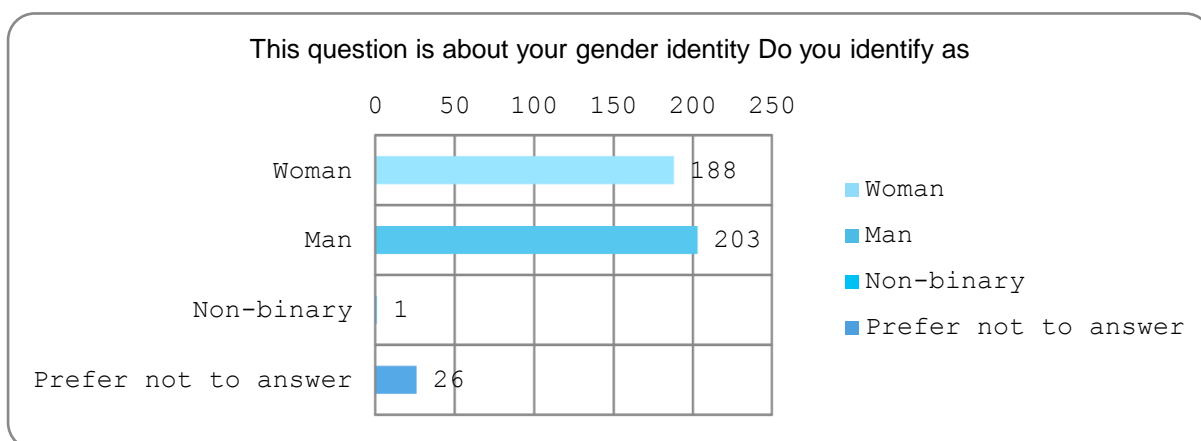


Figure 5. Sites: Summary of the gender identity of the Have Your Say respondents

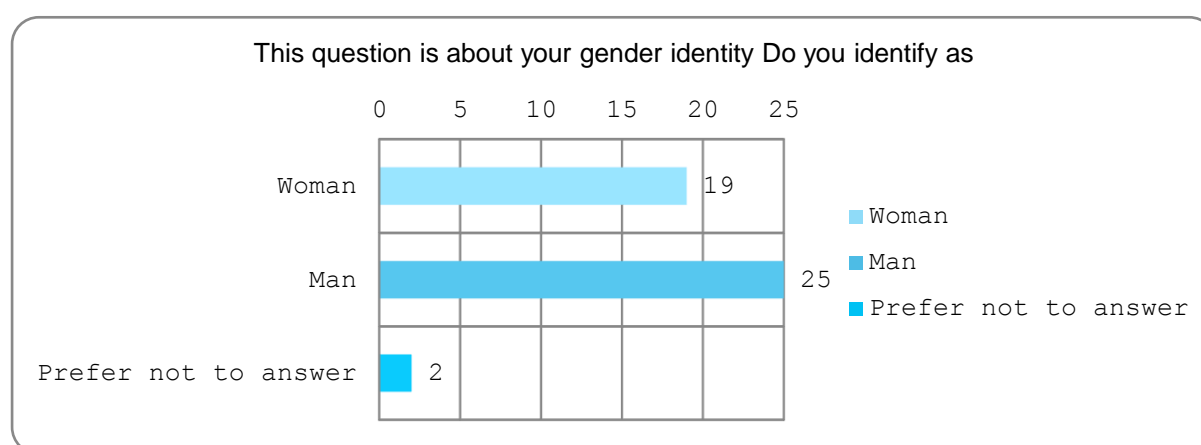


Figure 6. Policies: Summary of the gender identity of the Have Your Say respondents

3.5.4 In terms of ethnicity (see Figure 7 and 8 below), a large majority of respondents described themselves as White-British. The next largest ethnicity was those who described themselves as Asian or Asian British-Indian with a total of 32 respondents for sites and 1 for policies. This generally aligns with the ethnic breakdown of the district, which is predominantly White (77.1%) followed by the second largest ethnicity group “Asian British” (15.2%)¹. However, it must be noted that minimal representations were received from other ethnic minority groups such as Chinese and Black/Black British.

¹ <https://cdn.threerivers.gov.uk/files/2023/12/b46b2810-9f22-11ee-b0f6-2594c895ecd8-Equality%2C%20Diversity%20and%20Inclusion%20Policy%202023-26.pdf>

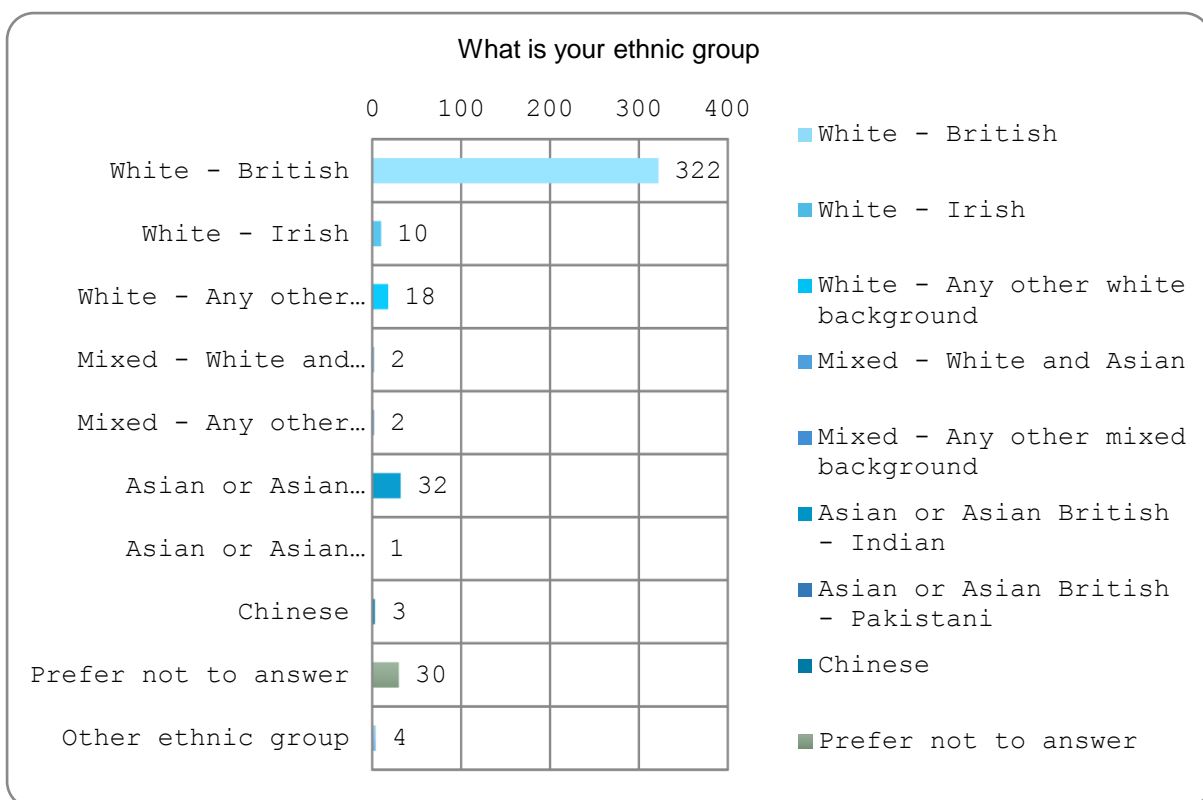


Figure 7. Sites: Summary of the ethnicity of the Have Your Say respondents

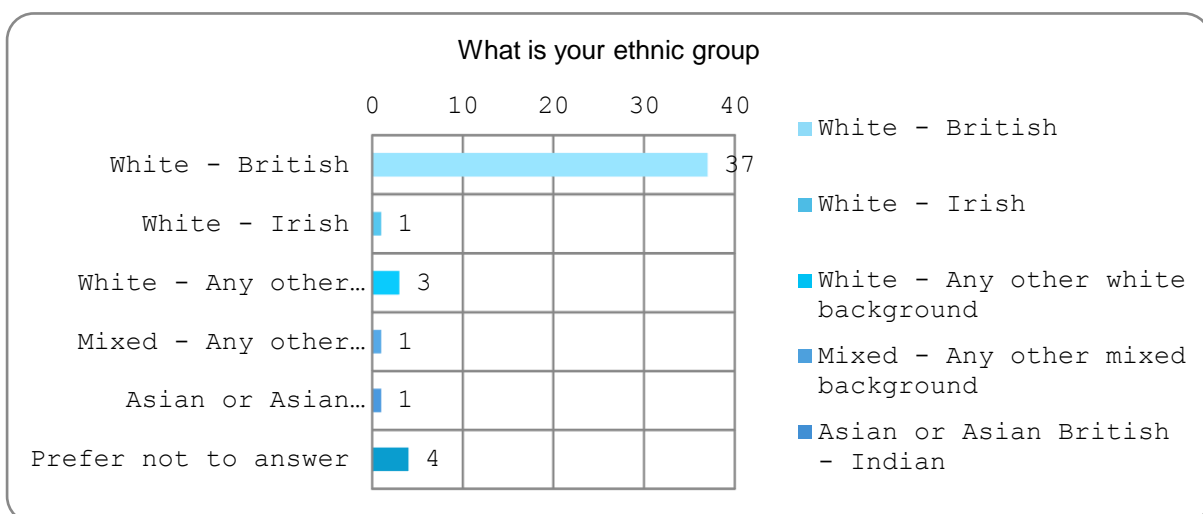


Figure 8. Policies: Summary of the ethnicity of the Have Your Say respondents

3.5.5 Have Your Say respondents were also asked what the beginning of their postcode was to ascertain which specific areas in the district responses were coming from. Additionally, to be accepted letters and emails had to include the address of the respondent. As set out in Figure 9 below, the area with the largest number of responses was Chorleywood, with a total of 135. Rickmansworth and Carpenders Park also provided a high number of responses with 86 and 99 respectively. A total of 58 responses originated from outside of the district.

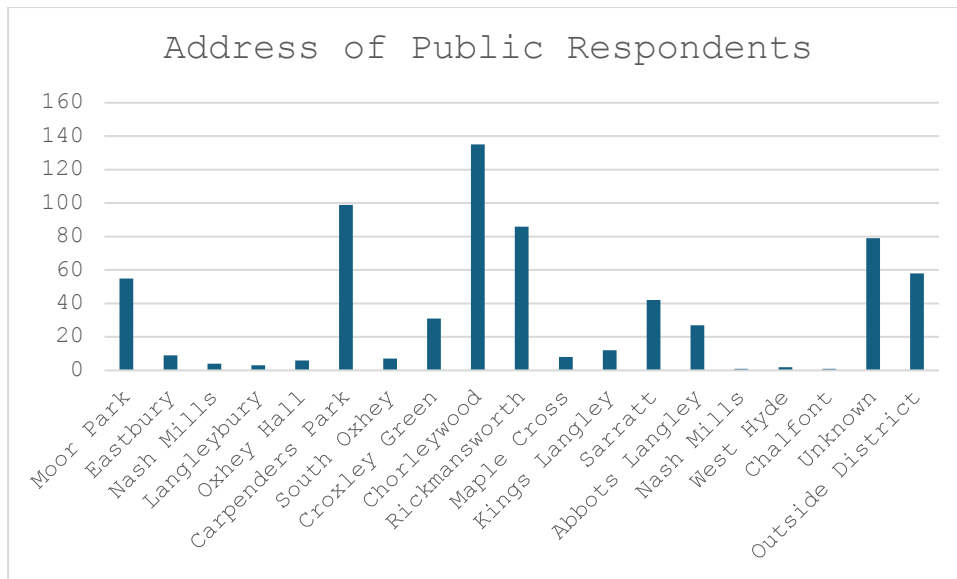


Figure 9: Summary of addresses of all respondents (Have Your Say platform, emails and letters combined)

3.6 Statutory Consultee Responses

3.6.1 The statutory consultee's responses related to their areas of expertise and identified mitigation measures to be considered as part of new developments.

3.6.2 Services operators including National Grid Electricity Transmission (NGET), Affinity Water and Thames Water made representations to the consultation. Thames Water made comments regarding the net zero policies. In response to Policy XB, the organisation questioned if 'regulated energy' included process energy used for treating and distributing water and wastewater and that it should be clear that the policy is not intended for process buildings. For Policy XC it was noted that achieving BREEAM 'Excellent' rating for process buildings is unlikely to be appropriate and may result in unnecessary design complexity or costs. Policy XD and specifically the embodied carbon limit is unlikely to be achievable for critical infrastructure projects. Similarly, Policy XE and feasibility assessments for demolition could have significant implications for the delivery of infrastructure upgrades.

3.6.2.1 Services operators including Affinity Water and National Grid provided general comments. Affinity Water listed sites PCS21 Love Lane and H22 Stockers Farm Road which are potentially being allocated in Regulation 19. It is noted that there should be appropriate revisions to both site boundaries and their potential yield. It is also suggested that Eastbury Pumping Station be included as part of a wider parcel including CFS67 and EOS11.0. National Grid stated that sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ.

3.6.3 Harrow and Buckinghamshire Councils provided comments on the Part 5 Regulation 18 consultation.

3.6.3.1 Buckinghamshire Council raised no concerns relating to the consultation, stating that TRDC's assessment of site suitability is noted, as is the position with regards outstanding evidence on the likely impacts and mitigations for sites, and therefore as this work could change the conclusion on the sites which are close to the boundary with Buckinghamshire, the Council reserves its position on them.

3.6.3.2 Harrow Council made comments regarding sites NCFS12 Land East of Oxhey Lane and NCFS22 Nine of Herts Golf Club. The Council objects to NCFS12 due to its impact on the Green Belt, its impacts upon Hatch End and surrounding infrastructure. It is recommended that TRDC ensures compliance with the NPPF Green Belt policy in order to demonstrate that exceptional circumstances apply to justify the release of sites such as NCFS12. Similarly, Harrow Council objects to NCFS22 due to impact on Green Belt, overdevelopment of the area and in an unsustainable location.

3.6.4 Four Parish Councils from within Three Rivers provided comments including Abbots Langley Parish Council, Sarratt Parish Council, Chorleywood Parish Council and Watford Rural Parish Council. A further two Parish Councils from outside of the district also provided comments to the consultation including Flaunden Parish Council and Chalfont St Peter Parish Council. Chorleywood Parish Council and Sarratt Parish Council both responded to the policies section of the consultation. Chorleywood Parish Council generally supports all of the policies and suggests that sites with protected species should require plans to demonstrate how the habitat of those species will be protected and that Policy XE could be simplified for regular householders. Sarratt Parish Council also generally supports the Biodiversity Policy and the Net Zero Policies and suggest further options for offsite Biodiversity net-gain and in response to Policy XA suggested the use of A6 Smart Energy Systems in relation to medium and large developments.

3.6.4.1 With regards to comments on specific sites, Abbots Langley Parish Council provided comments on **NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm and NCFS3 The Old Dairy, Chequers Lane**. The Parish Council agree that these sites are not suitable for development. Some of the concerns for the sites included:

- Concerns about urban sprawl and encroachment onto the Green Belt
- Concerns about harming the character and setting of Abbots Langley
- Sustainability and quality of supporting infrastructure
- Proposed schools negatively affecting the catchment area of Abbots Langley
- Loss of greenspace
- Lack of sustainable transport options
- Impact on historic and protected hedgerows
- Impact on local biodiversity
- Lack of clear association with the existing urban core

3.6.4.2 Abbots Langley Parish Council also provided comments on **NCFS4 High Elms Manor, NCFS6 Land to the East of Watford Road, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS10 Great Westwood Equestrian Park, NCFS19 Land Adjacent to 60 Harthall Lane and NCFS20 Lonsdale, Hyde Lane**. The Parish Council strongly objected to these sites due to the following reasons:

- Impact on heritage assets with the site's proximity to High Elms Manor (NCFS4)
- Impact on ancient woodland
- Potential loss of a public footpath
- Concerns about urban sprawl and encroachment onto the Green Belt
- Concerns on highway access and increased congestion
- Impact on local biodiversity
- Flood Risk (NCFS6)
- Impact on the historic local character

- Contamination risk (NCFS10)

3.6.4.3 Sarratt Parish Council stated Croxley Green Parish Council provided comments on **NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm and NCFS30 Sarratt Lodge**. The Parish Council agree that these sites are not suitable for development. The concerns relating to these sites included:

- Housing needs have already been met through approved developments in Sarratt
- No sustainable transport options
- Impact on AONB and Church End Conservation Area
- Concerns about urban sprawl and encroachment onto the Green Belt
- Edge of settlement
- Land locked (NCFS29)
- Archaeological significance
- Local historic character and heritage

3.6.4.4 Sarratt Parish Council also provided comments on **NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragmans Lane, NCFS10 Great Westwood Equestrian Park, NCFS17 North Hill Farm, NCFS36 Land North of Little Green Lane and NCFS18 Land to the East of Sarratt Lane**. The Parish Council strongly objected to these sites due to the following reasons:

- Unrealistic density (NCFS31, NCFS32)
- Impact on ancient woodland
- Potential loss of public footpath (NCFS31, NCFS32, NCFS18)
- Surface water flooding (NCFS31, NCFS10)
- Overdevelopment of Belsize (NCFS31, NCFS32)
- Impact on local character and heritage
- No sustainable transport options
- Requirement of a SANG (NCFS31, NCFS32)
- Edge of settlement
- Impact on local biodiversity
- Concerns over highways, congestion and access

3.6.4.5 Chorleywood Parish Council provided comments on **NCFS13 Catlips Farm, NCFS14 Land at Homefield Road and NCFS16 Stag Lane**. The Parish Council objected to these sites due to the following reasons:

- Inappropriate development in the Green Belt
- Concerns over highways, congestion and access
- Poor access to amenities
- Loss of Public Right of Way (NCFS13, NCFS16)
- Proximity to conservation area (NCFS13, NCFS14)
- Protected woodland (NCFS13, NCFS16)
- Proximity to M25 (NCFS13)
- Sewage and wastewater infrastructure
- Affordable housing provision
- Loss of community facility (NCFS14, NCFS16)
- Location within Local Wildlife Site (NCFS16)

3.6.4.6 Chorleywood Parish Council also provided comments on **NCFS15 Chorleywood Library** and **NCFS17 North Hill Farm**. The Parish Council generally supported these sites but had the following concerns:

- NCFS15 Chorleywood Library:
- It should be guaranteed that a new library of equal size and facility is provided as well as continuity of the service temporarily while construction is taking place
- Sufficient parking should be provided and for any development to be sympathetic to its surroundings within the Chorleywood Conservation Area
- NCFS17 North Hill Farm:
- Development should be restricted to the existing developed elements of the site and a new access onto the site created to avoid traffic exiting directly onto North Hill
- Development should be sympathetic to the conservation area and Chilterns National Landscape
- A full ecological assessment should be required, clarity provided over sewage management and a supply of 50% of the site being affordable housing

3.6.4.7 Watford Rural Parish objected to site NCFS12 Land East of Oxhey Lane. Concerns included:

- Green Belt harm and encroachment into open countryside
- Highway safety and inadequate infrastructure
- Flood risk and water management
- Impact on biodiversity and landscape character
- Unsustainable location and accessibility

3.6.4.8 Chalfont St Peter Parish Council objected to site **NCFS13 Catlips Farm**, **NCFS24 The Island, Land off Church Street** and **NCFS35 Land South of Chalfont Lane** citing development in the Green Belt and insufficient sewage capacity. The Parish Council also opposed NCFS15 Chorleywood Library due to the potential loss of a community facility.

3.6.4.9 Flaunden Parish Council objected to sites **NCFS31 Land to the South-East of Poles Hill** and **NCFS32 Land to the South-West of Bragmans Lane** citing loss of Green Belt, access, congestion, lack of sustainable transport, local character and biodiversity.

3.6.5 A number of Hertfordshire County Council departments provided their comments during the consultation. The comments were generally neutral with the inclusion of a number of recommendations for both policies and sites. A summary can be seen below.

HCC Ecology

Regarding the Biodiversity Policy, HCC Ecology suggest that TRDC should follow the government's templates for Biodiversity Net Gain (BNG) and Habitat Management and Monitoring Plan (HMMP) in order to reduce friction during the planning process. In terms of the Chilterns Beechwood (SAC), it is suggested that the measures are legally secured with any legal agreement including step in rights.

HCC Ecology also made comments on specific sites. For sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS7 Waterdell, NCFS14 Land at Homefield Road, NCFS15

Chorleywood Library, NCFS17 North Hill Farm, NCFS21 Land South of Scots Hill, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS23 Primrose Lodge, London Road, NCFS25 The Vicarage, Bury Lane, NCFS26 Meresworth Care Home, Field Way, NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm and NCFS30 Sarratt Lodge it was noted that there are no ecology sites within or adjacent but an ecological appraisal is recommended. More specific comments were made for the remaining sites. These are listed below:

- NCFS4 High Elms Manor – Local Wildlife Site: Garston Manor Grassland is located within the site, and a preliminary ecological appraisal is recommended
- NCFS6 Land to the East of Watford Road - Local Wildlife Site: Grand Union Canal/River Gade Manor Grassland is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS31 Land to the South-East of Poles Hill - Local Wildlife Site: Dabardine and Plough Woods is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS32 Land to the South-West of Bragmans Lane - Local Wildlife Site: Rosehall Wood is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS10 Great Westwood Equestrian Park - Local Wildlife Site: Ancient woodland Sherwoods Park is located within the site, Sherwoods Wood and Margeholes Wood are adjacent to the site, and a preliminary ecological appraisal is recommended
- NCFS11 Grange Wood - Local Wildlife Site: Grand Union Canal/River Gade Manor Grassland is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS12 Land East of Oxhey Lane - Local Wildlife Site: Hartsbourne Flood Defence Area is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS13 Catlips Farm - Local Wildlife Site: Pheasant's Wood is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS16 Land at Stag Lane - Local Wildlife Site: Wearing's Field is located within and in close proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS36 Land North of Little Green Lane - Local Wildlife Site: Dell Wood, Round Newlan's & Long Newland's Springs is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS20 Lonsdale, Hyde Lane - Local Wildlife Site: Pimlico House Woods & New Plantation is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS18 Land to the East of Sarratt - Local Wildlife Site: Long Spring and Upper Plantation is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS22 Nine of Herts Golf Club - Local Wildlife Site: Bishop's Wood is located within proximity of the site, and a preliminary ecological appraisal is recommended

- NCFS24 The Island, Land off Church Street – Croxley Hall Lakes is located within and in close proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS34 Pinewood Lodge – Oxhey Woods is located within and in proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS35 Land South of Chalfont Lane – Colne Valley Gravel Pits is located within and in proximity of the site, and a preliminary ecological appraisal is recommended

HCC Design and Construction Delivery

Regarding Policy XA, HCC Design and Construction Delivery suggest a water focussed, post occupancy evaluation policy as well as the encouragement of rainwater harvesting. Policy XB is generally supported but the effectiveness could be improved by stating specifically the methodology that applicants will be expected to utilise when demonstrating policy criterion 11. Policy XC is generally supported but it was suggested that for policy criterion 3 alternatives for BREEAM could be considered such as Leadership in Environmental and Energy and Environmental Design or the Homes Quality Mark (HQM).

HCC Property Planning

HCC Property Planning did not comment on any policies and generally supported some of the sites. Regarding NCFS15 Chorleywood Library, development was supported as long as it includes retention of the library and NCFS Pinewood Lodge should also include the playing field to the north east of the site as part of any development. It was however noted regarding NCFS26 Meresworth Care Home that the site is under offer to a purchaser and should therefore be removed.

HCC Transport

Multiple comments were made regarding sites. For sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS4 High Elms Manor, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS20 Lonsdale, Hyde Lane, NCFS27 Green End Farm, NCFS28 Ravenswood and NCFS29 New Model Farm there are concerns that there is little opportunity for enhancement of adjacent highways and no proposed Local Walking & Cycling Infrastructure Plans or Growth & Transport Plans that would benefit the site. More specific concerns were raised for the remaining sites. These are listed below:

- NCFS6 Land to the East of Watford Road – The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location and any proposed vehicular access from the A41 would conflict with policy
- NCFS31 Land to the South-East of Poles Hill – - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location
- NCFS32 Land to the North-West of Bragmans Lane - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its

unsustainable location and should evidence an HCC LTP4 compliant access strategy prior to allocation

- NCFS7 Waterdell - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location, there are challenges securing deliverable access to the site unless the site forms part of a cross boundary scheme and non-priority route 18 on North Orbital Road is a local scheme that has been identified as well as cycle improvements through Chiswell Green
- NCFS10 - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location and delivering access from the M25 is unlikely
- NCFS11 Grange Wood – If allocated then local plan policies will be expected to secure improvements to local sustainable transport provision and the site should evidence an HCC LTP4 compliant access strategy
- NCFS12 Land East of Oxhey Lane – If allocated then local plan policies will be expected to secure improvements to local sustainable transport provision, the site should evidence an HCC LTP4 compliant access strategy and non-priority route 13 and PR40_SW is a local scheme that has been identified
- NCFS13 Catlips Farm – The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location; there is little opportunity to improve unsuitable roads adjacent to the site and cycle route 14 is a priority scheme located close to the site
- NCFS14 Land at Homefield Road and NCFS15 Chorleywood Library – Cycle route 8 is a priority scheme located close to the sites
- NCFS16 Land at Stag Lane - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location; there is little opportunity to improve unsuitable roads adjacent to the site and cycle route 8 is a priority scheme located close to the site
- NCFS17 North Hill Farm – The site should evidence an HCC LTP4 compliant access strategy prior to allocation and cycle route 8 is a priority scheme close to the site
- NCFS21 Land South of Scots Hill – It is yet to be evidenced how a suitable access into the site and wider connectivity can be achieved, there are concerns that pedestrian and cycle access to local facilities can be achieved, prior to allocation an HCC LTP4 compliant strategy will need to be agree with highways and priority cycle route 2 is close to the site
- NCFS36 Land North of Little Green Lane – there is little opportunity to improve unsuitable access, the site should evidence an HCC LTP4 compliant access strategy and cycle route 18 is a priority scheme located close to the site
- NCFS18 Land to the East of Sarratt Lane - There is little opportunity to improve unsuitable roads adjacent to the site, there are major issues when considering alignment to national policy and HCC Local Transport Plan policies in terms of reducing the need to travel and promoting sustainable travel options and cycle route 8 is a priority scheme located close to the site
- NCFS22 Nine of Herts Golf Club and NCFS23 Primrose Lodge, London Road - There are major issues when considering alignment to national policy and

HCC Local Transport Plan policies in terms of reducing the need to travel and promoting sustainable travel options and cycle route 19 is a priority scheme located close to the site

- NCFS24 The Island, land off Church Street – There are concerns regarding the safety of any proposed internal movements, an HCC LTP4 compliant strategy will need to be agreed with highways and priority routes 2,3,8 and non priority routes 1,4 and 16 are located close to the site
- NCFS25 The Vicarage, Bury Lane - Priority routes 2,3,8 and non priority routes 1,4 and 16 are located close to the site
- NCFS26 Meresworth Care Home, Field Way – priority cycle routes 3 and 14 are located close to the site
- NCFS34 Pinewood Lodge – priority cycle routes 13 and 17 are located close to the site
- NCFS35 Land South of Chalfont Lane - There are major issues when considering alignment to national policy and HCC Local Transport Plan policies in terms of reducing the need to travel and promoting sustainable travel options and there are no proposed schemes identified close to the site

HCC Historic Environment

HCC Historic Environment made comments regarding specific sites. It is noted that site NCFS4 High Elms Manor is considered to not be suitable due to its location within the grounds of High Elms Manor. Sites NCFS14 Land at Homefield Road and NCFS15 Chorleywood Library are considered to have no impact on heritage assets. An archaeological assessment is recommended for the remaining sites.

HCC LLFA

Recommendations for flood risk mitigation are made for sites NCFS6 Land to the East of Watford Road, NCFS31 Land to the South-East of Poles Hill, NCFS7 Waterdell, NCFS11 Grange Wood, NCFS12 Land East of Oxhey Lane, NCFS14 Land at Homefield Road, NCFS15 Chorleywood Library, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS22 Nine of Herts Golf Club, NCFS23 Primrose Lodge, London Road, NCFS26 Meresworth Care Home, Field Way, NCFS34 Pinewood Lodge and NCFS35 Land South of Chalfont Lane. A sequential approach is critical for the western parcel of NCFS10 Great Westwood Equestrian Park while the site is not objected to in principle. NCFS24 The Island, land off Church Street and NCFS25 The Vicarage, Bury Lane are both objected to due to fluvial and groundwater flood risk. There was no objection to the remaining sites.

HCC Waste Disposal Authority

It is noted that for NCFS7 Waterdell is located adjacent to Waterdale Transfer Station, and an appropriate buffer would be required with any development. It is recommended that the remaining sites will be required to utilise S106 or CIL to fund increased service capacity.

The Waste Disposal Authority also made general comments for each settlement. These are listed below:

- Abbots Langley General Comments: Recycling Centre: This settlement is in the catchment area for Waterdale Recycling Centre. Waste Transfer Station:

This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.

- **Bedmond General Comments:** Recycling Centre: This settlement is in the catchment area for Hemel Hempstead Recycling Centre. The existing recycling facility at Eastman Way, Hemel Hempstead, is identified in HCC's 'Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex (Updated 2022)' as being too small to adequately deal with the high level of current, or future demand, or to meet requirements for the increased separation of waste to improve environmental objectives. The size of the centre significantly restricts its layout and the ability of vehicles to make use of available car parking spaces. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Belsize General Comments:** Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Bricket Wood General Comments:** Recycling Centre: This settlement is in the catchment area for Waterdale Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Bucks Hill/Langleybury General Comments:** Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Carpenders Park General Comments:** Recycling Centre: The majority of this settlement is in the catchment area for Rickmansworth Recycling Centre. However, there is a small part of the area (including part of NCFS12) which falls within the catchment area for Elstree Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Chorleywood General Comments:** Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer

Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.

- Croxley Green General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- Kings Langley General Comments: Recycling Centre: This settlement is in the catchment area for Hemel Hempstead Recycling Centre. The existing recycling facility at Eastman Way, Hemel Hempstead, is identified in HCC's 'Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex (Updated 2022)' as being too small to adequately deal with the high level of current, or future demand, or to meet requirements for the increased separation of waste to improve environmental objectives. The size of the centre significantly restricts its layout and the ability of vehicles to make use of available car parking spaces. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- Loudwater General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: average of 140%. The demand for SEND school places will keep increasing at a faster rate than the demand for mainstream schools, in line with recent trends. HCC continues to focus on addressing the identified priorities of the Special School Place Planning Strategy 2020-2023. Pupils with SEND will often travel further to school and most journeys to school will be in HCC home to school transport, which requires any school site to be highly accessible by road infrastructure and to have suitable pick up and drop of facilities onsite. Solutions to meet the needs of pupils with SEND often cross local planning authorities and therefore contributions may be sought across LPAs for individual projects
- Rickmansworth General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- South Oxhey General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.

HCC Education

It is noted that sites NCFS10 Great Westwood Equestrian Park, NCFS13 Catlips Farm and NCFS22 Nine of Herts Golf Club are isolated and therefore either provision a 1FE or 2FE would be required on site. All sites would require S106 or CIL to fund the delivery of new provision.

HCC Early Years

It is noted that one new childcare provision would be needed to meet the wider needs of the Abbots Langley/Hunton Bridge area to mitigate the demand in the area. For all sites S106 or CIL will be needed to be made available to fund the wider childcare and nursery requirements.

HCC Adult Care

For sites NCFS3 The Old Dairy, Chequers Lane, NCFS8 Land off St Albans Lane, NCFS9 Land to the South-West of Woodstock, NCFS7 Waterdell, NCFS17 North Hill Farm, NCFS36 Land North of Little Green Lane, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS20 Lonsdale Hyde Lane, NCFS18 Land to the East of Sarratt Lane, NCFS23 Primrose Lodge, London Road, NCFS24 The Island, land off Church Street and NCFS34 Pinewood Lodge it is noted that the size and location do not meet the criteria for being suitable for adult care development. It is suggested that sites NCFS1 Chequers House, Chequers Land, NCFS2 Fortunes Farm, NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragmans Lane, NCFS10 Great Westwood Equestrian Park, NCFS22 Nine of Herts Golf Club, NCFS29 New Model Farm and a combination of NCFS27 Green End Farm and NCFS28 Ravenswood do not meet the locational criteria but could be suitable for a larger housing with care scheme with a range of facilities. More specific suggestions for the remaining sites are listed below:

- NCFS4 High Elms Manor, NCFS11 Grange Wood – the site may be suitable for a nursing home or for 70-80 units of affordable or market housing-with-care
- NCFS6 Land to the East of Watford Road – the site may be suitable for a nursing home or housing-with-care
- NCFS12 Land East of Oxhey Lane, NCFS13 Catlips Farm – the site may be suitable for a larger housing with-care scheme that offers onsite facilities
- NCFS14 Land at Homefield Road – the site may be suitable for a block of six supported housing units
- NCFS15 Chorleywood Library – the site may be suitable for 4-6 supported housing units for individuals with learning disabilities/physical disabilities
- NCFS16 Land at Stag Lane – the site may be suitable for a nursing home or a block of six supported housing units
- NCFS21 Land South of Scots Hill – the site may be suitable for a housing-with-care scheme comprising 70-80 units in a mid-rise block layout
- NCFS25 The Vicarage, Bury Lane – the site is not suitable due to flood risk and size constraints
- NCFS26 Meresworth Care Home, Field Way – the site is not suitable due to size constraints
- NCFS34 Pinewood Lodge – the site could be suitable for a nursing homes

HCC Children's Homes

HCC Children's Homes made comments on five sites. It is noted for sites NCFS22 Nine of Herts Golf Club, NCFS29 New Model Farm, NCFS31 Land to the South-East of Poles Hill and NCFS32 Land to the South-West of Bragmans Lane that a 1 x 4-bedroom children's home is recommended. A Statement of Common Ground with the applicant for NCFS12 Land East of Oxhey Lane has been entered for the delivery of a 1 x 4-bedroom children's Home.

HCC Youth

No specific site comments were made but it is recommended that S106 or CIL is to be made available to fund increased service capacity for any development that takes place.

HCC Fire and Rescue Service

No specific site comments were made but it is recommended that S106 or CIL is to be made available to fund increased service capacity for any development that takes place.

HCC Libraries

No specific site comments were made but it is recommended that S106 or CIL is to be made available to fund increased service capacity for any development that takes place.

HCC Digital Growth

It is noted that overall, Three appears to be the worst performing mobile coverage provider in the area. Sites with particularly poor coverage are NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS10 Great Westwood Equestrian Park, NCFS13 Catlips Farm, NCFS17 North Hill Farm, NCFS18 Land to the East of Sarratt Lane, NCFS22 Nine of Herts Golf Club, NCFS23 Primrose Lodge, London Road, NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragmans Lane and NCFS35 Land South of Chalfont Lane.

HCC Minerals and Waste

Did not object to any of the sites but made comments on each of the sites. For sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS4 High Elms Manor, NCFS6 Land to the East of Watford Road, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS7 Waterdell, NCFS10 Great Westwood Equestrian Park, NCFS11 Grange Wood, NCFS13 Catlips Farm, NCFS17 North Hill Farm, NCFS36 Land North of Little Green Lane, NCFS18 Land to the East of Sarratt Lane, NCFS22 Nine of Herts Golf Club, NCFS24 The Island, land off Church Street, NCFS26 Meresworth Care Home, Field Way and NCFS35 Land South of Chalfont Lane it was noted that no concerns were raised due to minerals and waste, the sites were located within the Sand and Gravel Belt and opportunistic extraction would be encouraged. Sites NCFS12 Land East of Oxhey Lane, NCFS14 Land at Homefield Road, NCFS16 Land at Stag Lane, NCFS21 Land South of Scots Hill, NCFS19 Land Adjacent to 60

Harthall Lane, NCFS20 Lonsdale, Hyde Lane, NCFS23 Primrose Lodge, London Road, NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm, NCFS30 Sarratt Lodge and NCFS34 Pinewood Lodge also fall within the Sand and Gravel Belt but there is unlikely to be opportunity for opportunistic extraction. There were also no concerns related to minerals and waste. Sites NCFS31 Land to the South-East of Poles Hill and NCFS32 Land to the South-West of Bragmans Lane did not raise any concerns and are both outside of the Sand and Gravel Belt. It was additionally noted that NCFS15 Chorleywood Library and NCFS25 The Vicarage, Bury Lane were too small to be included as major development and therefore would not necessitate the need for a Site Waste Management Plan.

- 3.6.6 Infrastructure providers including the HWE ICB and National Highways provided comments. A summary of their comments can be seen below:

HWE ICB

HWE ICB were generally supportive of Net Zero Policy XC and noted that a meaningful assessment of the impact on healthcare services across the district can only be done once the SHELAA site assessments have been completed.

National Highways

The principal interest of National Highways is to safeguard the operation of the M25 J17, J18, J18 and J20. It is noted that a number of allocated sites have been identified near to the Strategic Road Network such as Great Westwood Equestrian Park, Waterdell, and Catlips Farm. If and when a full application comes forward for these sites, National Highways will provide further comments at that time.

- 3.6.7 Other statutory consultees which provided comments included Historic England, Canal and River Trust, Environment Agency and Natural England. A summary of their comments can be seen below:

Historic England

Made supportive comments for Net Zero Policy XE and commented that policy criterion E3, Adapting Heritage Assets to Climate Change was a balanced approach to improving the climate resilience of heritage assets. In terms of sites, it is noted that NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS31 Land to the South-East of Poles Hill, NCFS10 Great Westwood Equestrian Park, NCFS11 Grange Wood and NCFS26 Meresworth Care Home, Field Way are in close proximity to Listed Buildings or Conservation Areas, although they are likely to be acceptable from a heritage perspective, Heritage Impact Assessments are recommended. Sites NCFS32 Land to the South-West of Bragmans Lane, NCFS13 Catlips Farm, NCFS14 Homefield Road, NCFS15 Chorleywood Library, NCFS17 North Hill Farm, NCFS18 Land to the East of Sarratt Lane, NCFS22 Nine of Herts Golf Club, NCFS23 Primrose Lodge, London Road, NCFS24 The Island, land off Church Street, NCFS25 The Vicarage, Bury Lane, NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm, NCFS30 Sarratt Lodge and NCFS35 Land South of Chalfont Lane are also in close proximity to Listed Buildings or Conservation Areas but the heritage impact is unclear. It is again suggested that a Heritage Impact Assessment (HIA) is carried out for these sites. Historic England objected to NCFS4 High Elms Manor due to its impact upon the Listed Building of High Elms Manor. The remaining sites are considered to be suitable from a heritage perspective.

Canal and River Trust

Suggestions are made in relation to the Biodiversity and Net Zero Policy XC for a utilisation of the canals in the district to facilitate sustainable heating and cooling without an adverse effect on biodiversity to be included in the policy wording. The trust also commented on sites NCFS6 Land to the East of Watford Road and NCFS24 The Island, land off Church Street. It is noted that the Trust would require any development to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential from being fully unlocked or discourage the use of the waterway network.

Environment Agency

A number of recommendations regarding the Biodiversity Policy include a 10-metre buffer zone (instead of 8 metres) is integrated as a wider requirement in line with the biodiversity net gain river metric, wording integrated that states the river metric will be completed where appropriate, wording amended to build in the inclusion of 'priority species and habitats', better integration into wording of the Thames River Basin Management and a requirement for Water Framework Directive Assessment for development proposals that may have impacts on the water environment. For Net Zero Policy XC, it is suggested that wording for C2 and C5 includes that the frequency of future flooding events will increase as a result, for C2 that all developments should be designed to enhance resilience to the anticipated effects of climate change now and for their lifetime and for Section C5 that all development must incorporate proactive measures that increase resilience to extreme weather events and a changing climate. The Environment Agency also made a number of comments on specific sites. Sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS4 High Elms Manor, NCFS8 Land off St Albans Lane, NCFS9 Land to the South-West of Bragmans Lane, NCFS7 Waterdell, NCFS13 Catlips Farm, NCFS21 Land South of Scots Hill and NCFS26 Meresworth Care Home, Field Way are all within Source Protection Zone 1 areas and therefore should require robust supporting documentation demonstrating that appropriate sites will not result in the deterioration of groundwater quality. Sites NCFS6 Land to the East of Watford Road and NCFS12 Land East of Oxhey Lane are within Flood Zone 2 and a sequential test should be applied before a decision is made. Sites NCFS24 The Island, land off Church Street and NCFS25 The Vicarage, Bury Lane are both opposed due to their location in Floodzones 3b and 3a.

Natural England

England were supportive of the Chilterns Beechwoods SAC Policy and identified potential allocations NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragman's Lane and NCFS10 Great Westwood Equestrian Park as being within the sphere of influence. It is also suggested that NCFS7 Waterdell and NCFS10 Great Westwood Equestrian Park are within the Impact Risk Zones for Bricket Wood Common SSSI and Westwood Quarry SSSI and would therefore require further consultation with Natural England. Additionally, NCFS35 Land South of Chalfont Lane triggers the protected sites for potential water and water quantity impacts of Mid Colne Valley SSSI, Denham Lock Wood SSSI, and Fray's Farm Meadows SSSI and therefore would be required to follow the highest water efficiency standards.

3.7 Landowner/ Promoter Responses

- 3.7.1 The majority of landowner/promoter responses generally supported the Net Zero policies but provided a number of recommendations for alterations. Suggestions were also received for alterations to the other policies.

3.7.2 Several consistent themes and arguments were raised within the landowner/promoter policy responses:

- Inconsistency with the 2023 Written Ministerial Statement creating a challenge regarding viability
- Inconsistency with the Government's Future Homes Standard (FHS)
- Inconsistency with the Government's Future Building Standard (FBS)
- Policy XC water credits lack of flexibility and does not align with national standards
- Policy XD limits on embodied carbon may prove challenging and does not align with national standards
- The Council should submit a full Regulation 18 Draft Plan prior to proceeding to Regulation 19
- Minimal progress being made to meet housing targets

3.7.3 The following sites received objections from other landowners/promoters.

- **NCFS1 Chequers House, Chequers Lane** – unsustainable, inaccessible and isolated
- **NCFS2 Fortunes Farm** – unsustainable, inaccessible and isolated
- **NCFS3 The Old Dairy, Chequers Lane** – unsustainable, inaccessible and isolated
- **NCFS4 High Elms Manor** – unsustainable, inaccessible and isolated
- **NCFS6 Land to the East of Watford Road** – unsustainable, inaccessible and isolated
- **NCFS8 Land off St Albans Lane** – unsustainable, inaccessible, isolated, inappropriate access arrangements and highway safety concerns
- **NCFS9 Land to the North-West of Woodstock** - unsustainable, inaccessible, isolated, inappropriate access arrangements and highway safety concerns
- **NCFS31 Land to the South-East of Poles Hill** – unsustainable, inaccessible and isolated
- **NCFS32 Land to the South-West of Bragmans Lane** – unsustainable, inaccessible and isolated
- **NCFS7 Waterdell** – unsustainable, inaccessible and isolated
- **NCFS10 Great Westwood Equestrian Park** – unsustainable, inaccessible and isolated
- **NCFS11 Grange Wood** – unsustainable, inaccessible and isolated
- **NCFS12 Land East of Oxhey Lane** – unsustainable, inaccessible and isolated
- **NCFS13 Catlips Farm** – unsustainable, inaccessible and isolated
- **NCFS14 Land at Homefield Road** – Loss of residential care facility
- **NCFS16 Land at Stag Lane** - Loss of protected open space
- **NCFS36 Land North of Little Green Lane** – Unsustainable location
- **NCFS18 Land to the East of Sarratt Lane** – Risk to safety, countryside amenity and integrity of the Green Belt
- **NCFS27 Green End Farm** – Poor pedestrian access
- **NCFS28 Ravenswood** - Poor pedestrian access
- **NCFS29 New Model Farm** – Poor pedestrian access and unsustainable location

3.8 Public Responses

3.9 A large majority of public respondents (including responses received from Have Your Say platform, emails and letters) agree with the Council's proposed policies. For Question 1, related to the Council's proposed Biodiversity Policy, there were 23

members of the public who were in support and 12 that were opposed (see Figure 10 below).

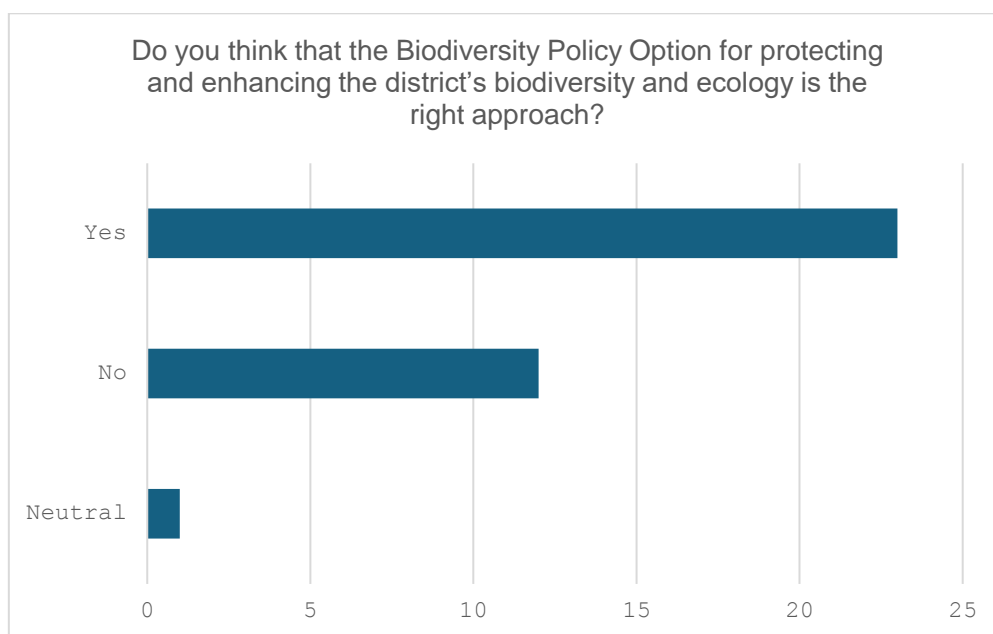


Figure 10. Summary of all public individual respondent's answers to Question 1

- 3.10 A similarly large majority of public individual respondents agreed with the Council's Chiltern Beechwoods Special Area of Conservation (SAC) Policy Option. (see Figure 11 below) In total, 14 respondents agreed with this approach whilst 4 did not.

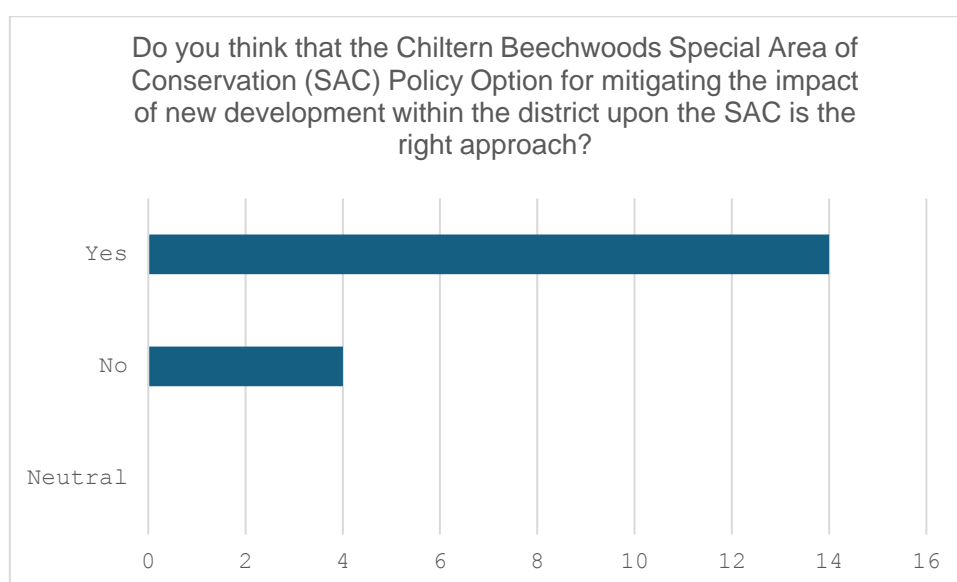


Figure 11. Summary of all public individual respondent's answers to Question 3

- 3.11 A large majority of public individual respondents agreed with the Council's Northwood Headquarters (MOD) Policy Option. (see Figure 12 below) In total, 16 respondents agreed with this approach whilst 5 did not.

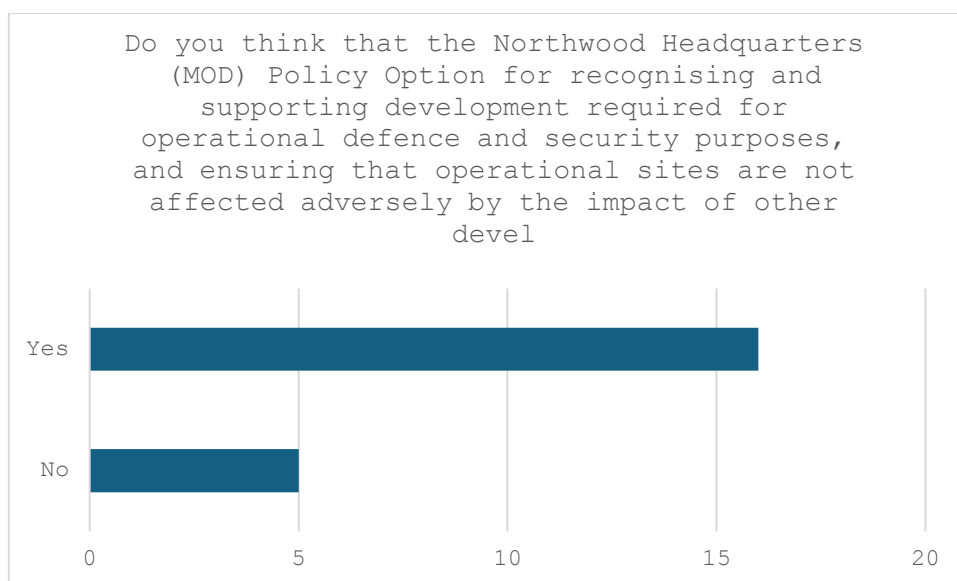


Figure 12. Summary of public individual respondent's answers to Question 5

- 3.12 A small majority of public individual respondents agreed with the Council's Net Zero Policy XA Option. (see Figure 13 below) In total, 11 respondents agreed with this approach whilst 9 did not.

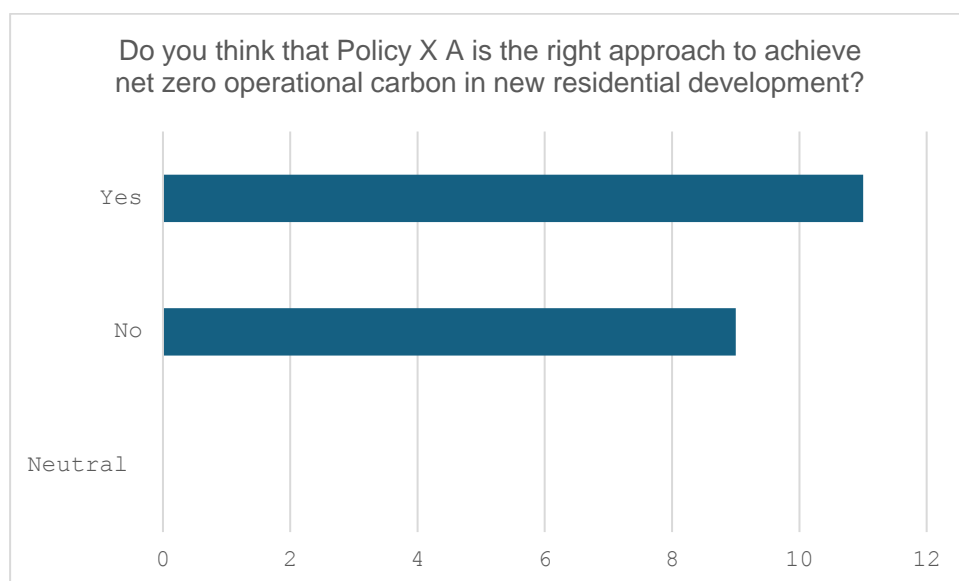


Figure 13. Summary of public individual respondent's answers to Question 7

- 3.13 A small majority of public individual respondents agreed with the Council's Net Zero Policy XB Option. (see Figure 14 below) In total, 11 respondents agreed with this approach whilst 8 did not.

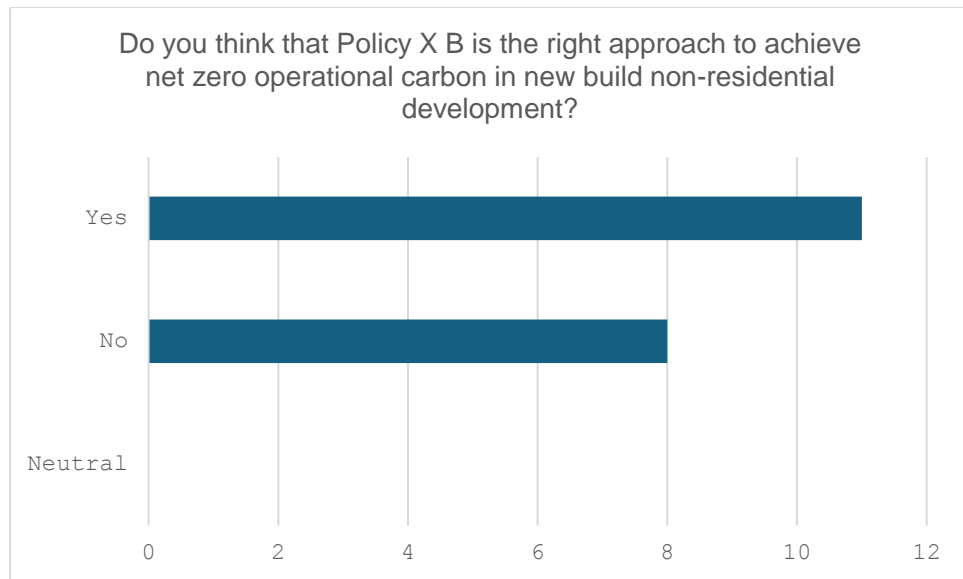


Figure 14. Summary of public individual respondent's answers to Question 9

- 3.14 A large majority of public individual respondents agreed with the Council's Net Zero Policy XC Option. (see Figure 15 below) In total, 13 respondents agreed with this approach whilst 4 did not.

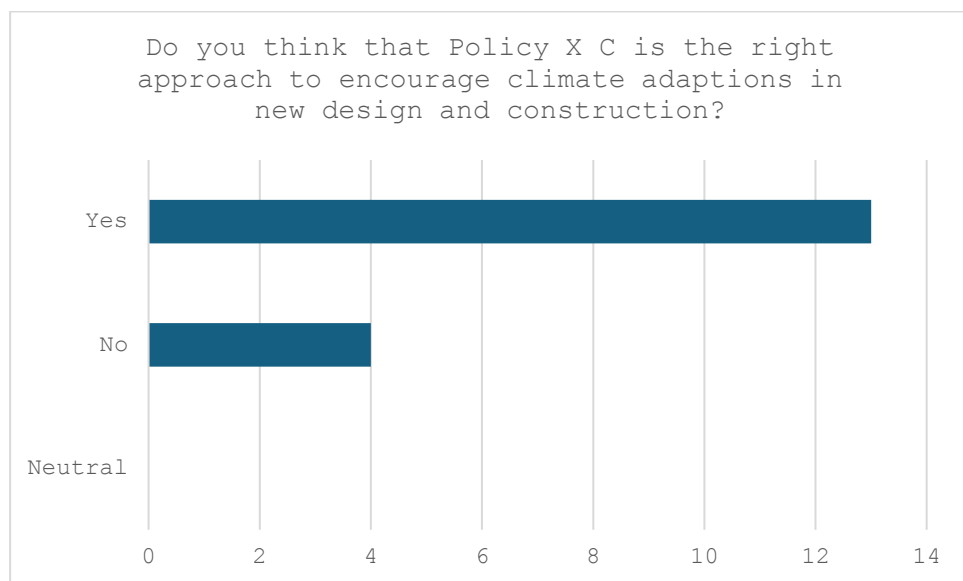


Figure 15. Summary of public individual respondent's answers to Question 11

- 3.15 A majority of public individual respondents agreed with the Council's Net Zero Policy XD Option. (see Figure 16 below) In total, 12 respondents agreed with this approach whilst 6 did not.

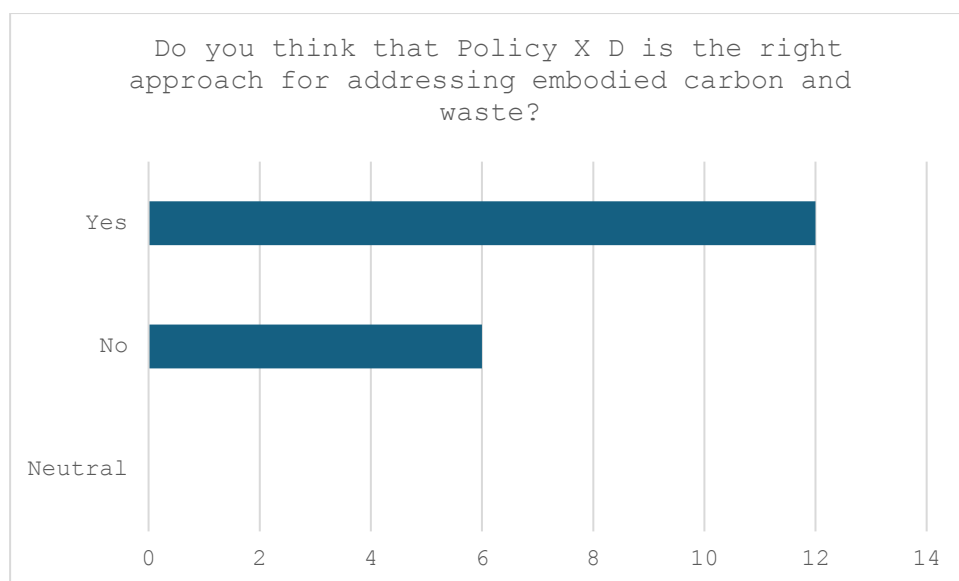


Figure 16. Summary of public individual respondent's answers to Question 13

- 3.16 A large majority of public individual respondents agreed with the Council's Net Zero Policy XE Option. (see Figure 17 below) In total, 15 respondents agreed with this approach whilst 4 did not.

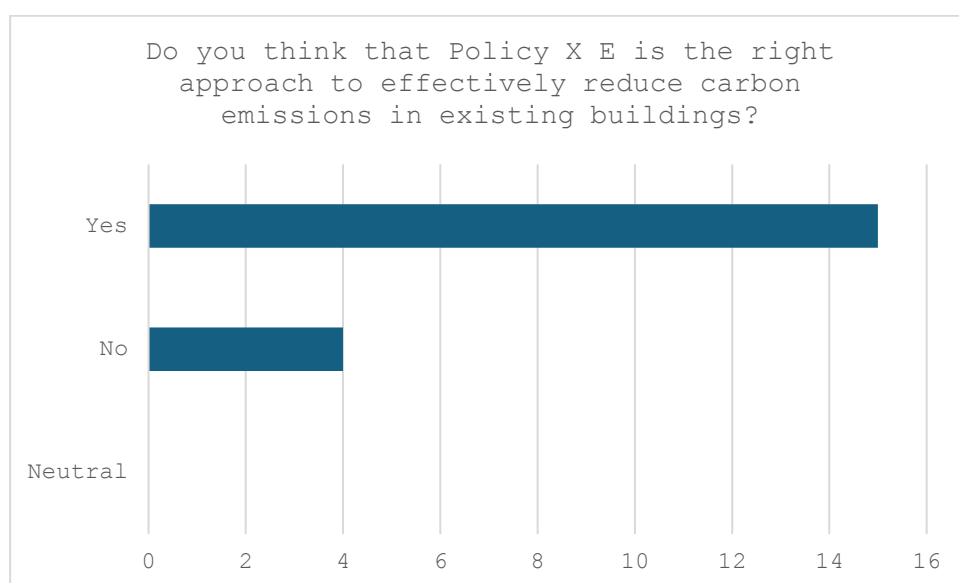


Figure 17. Summary of public individual respondent's answers to Question 15

3.17 Key Themes Within Public Responses to Policies:

- 3.17.1 A number of key themes were identified through the public responses to the policies section of the consultation, as set out below.

- **Biodiversity Policy** – Public respondents tended to be in support of the protection of biodiversity, ecology and open space while some believe that the policy should go further. There are concerns that developers may not take Biodiversity Net Gain seriously and that

being able to offset development offsite rather than onsite will be detrimental to local communities.

- **Chilterns Beechwoods Special Area of Conservation (SAC) Policy** – Public respondents tended to be in support of the policy, noting the importance to protect the natural environment. However, there are once again concerns relating to developers avoiding their responsibilities.
- **Northwood Headquarters (MOD) Policy** – Public respondents tended to be in support of the policy, noting the importance of supporting the MOD to function effectively. There were a few responses which suggested that the site may be better used for affordable housing.
- **Policy XA: Net Zero Operational Carbon in New Build Residential Development** – Public respondents tended to be in support of the policy, particularly mentioning the importance to reduce pollution and combat climate change. Some respondents suggested that the policy went further regarding solar panels, water reservation and pressure on developers to adhere to standards.
- **Policy XB: Net Zero Operational Carbon in New Build Non-Residential Development** - Public respondents tended to be in support of the policy, particularly mentioning the importance to reduce pollution and combat climate change. Again, there were a few concerns regarding policy implementation.
- **Policy XC: Climate-adapted Design and Construction** – Public respondents tended to be in support of the policy, mentioning the importance to protect new development against the impacts climate change.
- **Policy XD: Embodied Carbon and Waste** – Public respondents tended to be in support of the policy but some suggested that it does not go far enough.
- **Policy XE: Reducing Carbon Emissions in Existing Buildings** – Public respondents were generally supportive of the policy with some concerns relating to the feasibility of implementation.

3.18 Key Themes Within Public Responses to Sites:

3.18.1 A number of key themes were identified through the public responses to the sites section of the consultation, as set out below.

3.18.2 **Green Belt**

The vast majority of public respondents were in favour of protecting the Green Belt to some degree. Whilst many acknowledged that some Green Belt release may be necessary, many respondents were against any form of Green Belt release.

Many indirect impacts of Green Belt release were mentioned including the loss of open space (and how this may impact on mental health), impact on wildlife, impact on character and loss of greenfield land.

3.18.3 Transport

Many respondents expressed concerns over access, parking, highway infrastructure and increased congestion. These concerns were mainly prevalent for the larger, more rural sites, which many are proposed to be served via single-track country lanes. These concerns were often the most prevalent alongside the Green Belt.

3.18.4 Infrastructure

Many public respondents expressed concerns more generally about the inadequacy of existing infrastructure and the impact of new development on the existing infrastructure and services including putting a strain on doctors and schools. Specific infrastructure included schools, medical facilities, roads, public transport and sewage and drainage systems. There were also questions as to whether infrastructure would be delivered as part of new developments.

3.18.5 Sustainability

Many public respondents expressed concerns relating to the sustainability of some sites, particularly those in isolated rural areas. Many suggested that some of the more isolated sites were unsustainable due to the reliance on car usage, lack of active travel infrastructure and safe pedestrian footpaths and poor access to amenities.

3.18.6 Ecology and Biodiversity

Many public respondents expressed concerns relating to the natural environment. This included harm to biodiversity, including protected species, protected trees and general open green spaces. It was often noted when a site was within or close proximity to a Local Wildlife Site or protected woodland.

3.18.7 Flooding

The risk of flooding, particularly surface water flooding was raised by many of the public respondents for many of the sites. This was particularly prevalent for sites NCFS6 Land to the East of Watford Road, NCFS24 The Island, land off Church Street and NCFS25 The Vicarage, Bury Lane, of which the risks of flooding were made prevalent within the SHELAAs.

3.18.8 Local Character

Some respondents expressed concerns relating to a development's potential impact upon the local character of an area. This was particularly prevalent for sites located within or in close proximity to a Conservation Area or a Listed Building. There were also comments relating to the general character of the rural setting of the District. Additionally, for many sites, the indicative dwelling capacity was referred to, often stating that the site was being over developed.

- 3.19 The majority of sites received more “no” responses to whether they are considered an appropriate development site than “yes” responses. The sites with the highest percentage of ‘no’ responses are listed below.

NCFS31: Land to the South-East of Poles Hill

Public Consultees: Yes: 7, No: 98

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Impact on Local Character and heritage

- Unsustainable location
- Ecology and Biodiversity
- Congestion

NCFS32: Land to the South-West of Bragmans Lane

Public Consultees: Yes: 6, No: 96

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Impact on Local Character and heritage
- Unsustainable location
- Ecology and Biodiversity
- Congestion

NCFS13: Catlips Farm

Public Consultees: Yes: 19, No:189

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Impact on Local Character and heritage
- Ecology and Biodiversity
- Urban sprawl and overdevelopment connecting the two settlements of Rickmansworth and Chorleywood
- Proximity to motorway
- School, Doctors and sewage capacity
- Congestion

NCFS16: Land at Stag Lane

Public Consultees: Yes: 8, No: 139

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Ecology and Biodiversity
- Impact upon Local Wildlife Site and loss of open space
- Impact on Public Right of Way
- Overdevelopment of area
- Congestion

NCFS36: Land North of Little Green Lane

Public Consultees: Yes: 7, No: 77

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Congestion
- Ecology and Biodiversity
- Impact on Local Character and heritage

3.20 However, three sites received more “yes” responses than “no”, as seen below:

NCFS15: Chorleywood Library

Public Consultees: Yes:100, No:47

Main Themes and Concerns:

- Brownfield site
- Sustainable location with good access to amenities and services
- Concern over potential loss of library (including public toilets)
- Concern over impact on local character and Chorleywood Conservation Area

NCFS26: Meresworth Care Home, Field Way

Public Consultees: Yes: 71, No:17

Main Themes and Concerns:

- Brownfield Site
- Sustainable location with good access to amenities and services
- Concern over loss of care home and potential capacity issues elsewhere

NCFS34: Pinewood Lodge

Public Consultees: Yes: 43, No: 24

Main Themes and Concerns:

- Brownfield Site (although located within the Green Belt)
- Sustainable location with good access to amenities and services
- Concern over impact on protected woodland and ecology

3.21 Comments on the Sustainability Appraisal Accompanying the Consultation

3.22 There were some concerns raised relating to the adequacy of the assessment for the suitability of sites and may underplay the sustainability impact of some of the proposed developments. Other concerns include the need to focus on practical achievable targets that demonstrate best practice.

4.0 Potential Updates Following the Part 5 Regulation 18 Consultation

4.1 The planning policy team have collated all of the public, statutory consultee and landowner/promoter responses, with each individual response responded to by policy officers. The policy team will review the public, statutory consultee and landowner/promoter responses and our responses to these and use this information to update wording of policies, SHELAA forms, evidence documents and any other pieces of information relevant to the decision-making process.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank