

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

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