

PLANNING COMMITTEE - Thursday 22 January 2026

25/1754/ADV - Advertising Consent: Display of flags at THREE RIVERS HOUSE, NORTHWAY, RICKMANSWORTH, HERTFORDSHIRE, WD3 QRL

Parish: Batchworth Community Council
Expiry of Statutory Period: 28.01.2026

Ward: Rickmansworth Town
Case Officer: Lilly Varnham

Recommendation: That ADVERTISEMENT CONSENT BE GRANTED subject to conditions.

Reason for consideration by the Committee: The applicant is Three Rivers District Council.

To view all documents forming part of this application please go to the following website:

[25/1754/ADV | Advertising Consent: Display of flags | Three Rivers House Northway Rickmansworth Hertfordshire WD3 1RL](https://www.hertsmere.gov.uk/planning/251754ADV_Advertising_Consent_Display_of_flags_Three_Rivers_House_Northway_Rickmansworth_Hertfordshire_WD31RL)

1 Relevant planning history

- 1.1 8/120/88: Erection of office building and ancillary car park. Permitted and implemented.
- 1.2 10/2174/FUL: Change of use of part of the ground floor of Three Rivers House to a police station with associated parking, including the erection of a small storage shed. Permitted and implemented.
- 1.3 12/1444/FUL: Change of use of part of ground floor from Council office space to use as part of Police Station either for office use or locker/amenity area and for storage; increase in parking from 12 spaces to 25 spaces. Permitted and implemented.
- 1.4 12/1981/FUL: Reallocation of parking spaces at Three Rivers House to provide 25 spaces in total (increase of 13) for the Police in order to provide sufficient parking for Intervention Team Officers. Erection of 2 metre high green paladin fencing to side of bays 20 and 21 (Rose Garden) and automatic barrier. Permitted and implemented.
- 1.5 15/1874/FUL: District Council Application: Installation of photovoltaic panels to roofslopes – Permitted and implemented.
- 1.6 22/2255/FUL: Installation of 7no. Air source heat pumps within timber enclosure in south western corner of top floor of car park – Permitted and Implemented.
- 1.7 25/1595/PDNE - Permitted Development Notice: Installation of solar panels – Permitted. Not Implemented.

2 Site description

- 2.1 Three Rivers House is the principal office of Three Rivers District Council, additionally, following the grant of planning permission 10/2174/FUL a large section of the East Wing of the building has been occupied by the Police since February 2011 following the closure of Rickmansworth Police Station. The application relates only to the two areas of the building where there are existing and well-established flagpoles. The site is located within the Rickmansworth Town Centre Conservation Area.
- 2.2 The building is three storeys but when viewed from the north it has a two-storey appearance due to the change in levels on Northway rising up to the north from the south. There is a double decked car park to the east of the office building with a public right of way crossing it in an east to west direction between the Cloisters to the east and Northway to the west.
- 2.3 To the south of the building is Basing House, a two storey Grade II Listed Building, and Rickmansworth Library, a single storey flat roofed building. Beyond the library is the High Street which is mainly occupied by commercial premises.

3 Description of proposed development

- 3.1 This application seeks advertisement consent to allow for the flying of various flags at Three Rivers House which do not benefit from deemed consent under The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) and therefore require advertisement consent.
- 3.2 The list of flags proposed have been included with this application and include the following: 1978 Pride Flag (Rainbow), Armed Forces, Commonwealth, Emergency Services, Ensign, Holocaust Memorial Day, Intersex-Inclusive Progress Pride Flag, NHS, Pride, Progress Pride Flag, St George, TRDC, Ukraine, Union / Union Jack and White Ribbon Flag.
- 3.3 Some of the flags in the above list do not require consent, these include the Armed Forces Day flag, flag of the Commonwealth, the Union/Union Jack Flag and St George Flag as these fall under Schedule 1 Class H of the Regulations but have been included within the list for completeness.
- 3.4 The flags will be flown on two existing flag poles at Three Rivers House, one of which faces west towards Northway and the other north towards Three Rivers Rose Garden Car Park. It is understood that the dimensions of the flags are 1.52m x 0.91m with the exception of the Union/Union Jack flag which has a maximum size 1.6m x 1m. The height from the ground to the base of the advertisement is 6m and the maximum projection of the advertisement from the face of the building is 1m.
- 3.5 The flags are not illuminated and are a knitted or woven polyester.

4 Consultee responses

4.1 National Grid – [No response received]

4.2 Batchworth Community Council - BCC notices that the Union Flag is not included in the illustrated list and wishes for it to be added for inclusion.

4.3 Conservation Officer – [No Objection]

Three Rivers House is in the Rickmansworth Conservation Area and is not a nationally or locally listed building. The proposed flag location faces towards the Grade II listed War Memorial Statue (List Entry Number: 1348251). It is also close to the Grade II listed Basing House (List Entry Number: 1100850).

The proposed flagpole and flags are appropriate for this location; they would not impact the setting of the designated heritage assets described above.

On this basis, there is no heritage objection to the proposal.

This response has been made with regard to Sections 72 (1) and 66 (1) of the Planning Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework Chapter 16 'Conserving and Enhancing the Historic Environment'.

- 4.4 **Officer Comment:** Comments from the parish are noted. The list of flags has been updated to include the Union Flag.

5 Neighbour consultation

- 5.1 Site Notice Posted: 11.07.2025, Expired: 01.08.2025
- 5.2 Press Notice Published: 11.07.2025, Expired: 01.08.2025
- 5.3 No. consulted: 0 No. of responses: 1 [1 Objection Received]
- 5.4 Summary of responses:

- Support display of official, unifying civic flags only: The Union Flag, the St George's Cross, and appropriate County/Town or civic ceremonial flags.
- Broad consent would allow non-official, campaign, pressure-group or politically associated flags/ When a flag is flown it will be widely interpreted as an official Council endorsement, undermining confidence in the Council's neutrality and risking division in the community.
- Approval would set an unhelpful precedent. Once wide permissions exists, refusing future requests becomes contentious and invites disputes about which causes qualify, drawing the Council into political or international controversies outside its proper civic role.
- From an amenity perspective, a changing range of flags can create visual clutter and harm the appearance of a prominent public building and the streetscene.
- There are also safety and security risks: contentious displays can attract protests, counter-protests or vandalism, increasing risk to staff and visitors and creating avoidable expense.
- A wider flag programme brings ongoing cost for purchase, replacement, storage and maintenance, plus staff time to manage requests and complaints, and the costs of the consent process itself.
- Application should be refused. Or approved only with strict conditions limiting flags to official national and local civic/ceremonial flags, with clear limits on number, size, siting and duration, backed by a published policy protecting political neutrality and community cohesion.

Officer Comment: Comments from the neighbour are noted. The only flags proposed are those listed within the submission.

6 Relevant Local and National Planning Policies

6.1 Legislation

Outdoor advertisements are within the scope of the control regime specified by the Secretary of State in the Town and Country Planning (Control of Advertisements) Regulations 2007 (as amended).

S72 of Planning (Listed Buildings and Conservation Areas) Act 1990 requires LPAs to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

The Localism Act received Royal Assent on 15 November 2011. The Growth and Infrastructure Act achieved Royal Assent on 25 April 2013.

The Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010, the Natural Environment and Rural Communities Act 2006 and the Habitat Regulations 1994 may also be relevant.

The Environment Act 2021.

6.2 Policy/Guidance

National Planning Policy Framework and National Planning Practice Guidance

In December 2024 the revised NPPF was published, to be read alongside the online National Planning Practice Guidance. The 2024 NPPF is clear that "existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework".

The NPPF retains a presumption in favour of sustainable development. This applies unless any adverse impacts of a development would 'significantly and demonstrably' outweigh the benefits unless there is a clear reason for refusing the development (harm to a protected area).

The Three Rivers Local Development Plan

The application has been considered against the policies of the Local Plan, including the Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013) and the Site Allocations Local Development Document (adopted November 2014) as well as government guidance. The policies of Three Rivers District Council reflect the content of the NPPF.

The Core Strategy was adopted on 17 October 2011 having been through a full public participation process and Examination in Public. Relevant policies include Policies CP1, CP9, CP10, and CP12.

The Development Management Policies Local Development Document (DMLDD) was adopted on 26 July 2013 after the Inspector concluded that it was sound following Examination in Public which took place in March 2013. Relevant policies include DM3, DM6 and DM9.

Batchworth Neighbourhood Plan 2023-2038 (Referendum Version, November 2025)

6.3

Other

Rickmansworth Conservation Area Appraisal (1993).

7

Analysis

7.1

Advert Regulations

7.1.1

Outdoor advertisements are within the scope of the control regime specified by the Secretary of State in the Town and Country Planning (Control of Advertisements) Regulations 2007 (as amended).

7.1.2

This regime enables local planning authorities to control advertisements, when it is justified, in the interests of "amenity" and "public safety".

7.1.3

Amenity is not defined in the regulations, although it includes aural and visual amenity and factors relevant to amenity include the general characteristics of the locality and the presence of any feature of historic, architectural, cultural or similar interest.

7.1.4

Paragraph 141 of the National Planning Policy Framework advises that the quality and character of places can suffer when advertisements are poorly sited and designed. It also advises that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts

7.2

Amenity

7.2.1

Policy CP1 of the Core Strategy (adopted October 2011) seeks to promote buildings of a high enduring design quality that respect local distinctiveness. Policy CP12 of the Core Strategy states that development should 'have regard to the local context and conserve or enhance the character, amenities and quality of an area' and 'conserve and enhance natural and heritage assets'.

7.2.2

Officers note that the flying of flags already takes place at Three Rivers House, and this application seeks advertisement consent for a wider range of flags which are not granted deemed consent from the regulations.

7.2.3

The flags will be flown from the existing flagpoles, which are considered ancillary to the display of the flags under Section 222 of the Town and Country Planning Act. Section 222 provides that planning permission is deemed to be granted for any development of land involved in the display of advertisements in accordance with the relevant regulations.

7.2.4

Consent under Section 222 does not extend to the erection of any structure unless its primary purpose is to display advertisements. In this instance, the primary purpose of the existing flag poles is the flying of flags. Accordingly, should advertisement consent be granted for the flags, the flagpoles themselves would be considered ancillary structures associated with the approved display.

7.2.5 The flags themselves would project minimally from the face of the host building and are non-illuminated. The flags are a standard size with the exception of the Union/Union Jack flag which is slightly larger. As such, they are not considered to be visually prominent or a contrived feature within the streetscene or wider area. In addition, whilst flags are not a common feature of the streetscene, it is not considered to be uncommon for a civic building to fly flags of a similar nature. The proposal would not detract from the architectural character of the host building, and by virtue of its limited scale and discreet appearance would preserve the character and appearance of the Rickmansworth Town Centre Conservation Area.

7.3 Policy CP12 of the Core Strategy states that development should 'protect residential amenities by taking into account the need for adequate levels of disposition of privacy, prospect, amenity and garden space'.

7.3.1 The flying of the flags in these locations would not give rise to any unacceptable impact on residential amenity. The flags are modest in scale, non-illuminated, and would be flown from the existing poles which remain separated from any neighbouring built form. The flags would not result in overlooking, loss of privacy or any material change in outlook for nearby residents. Given their limited projection and lightweight nature, the flags would not result in any loss of daylight nor are they considered to result in a sense of enclosure or adversely affect the use or enjoyment of nearby private amenity space. As such, the proposed is considered acceptable and is not considered to result in any harm to amenity. Given that the flags would be limited in number (one to each existing pole) at any given time, it is not considered that they would result in undue visual clutter when read in their immediate context.

The proposed flag location(s) face towards the Grade II listed War Memorial Statue (List Entry Number: 1348251) and are near to the Grade II listed Basing House (List Entry Number: 1100850). The Conservation Officer was consulted on the application and advised that the proposed flagpole and flags are appropriate for this location; owing to the separation of the flag poles / flags from the above designated heritage assets it is not considered that they would have any impact on their setting . Thus, there is no heritage objection to the proposal

7.3.2 Overall, it is considered that the flags would be an appropriate development within its setting and would not result in harm to amenity, either the character and amenity of the area or residential amenities of neighbouring occupiers. The development would be acceptable in accordance with Policy CP12 of the Core Strategy (adopted October 2011).

7.4 Public Safety

7.4.1 Core Strategy Policy CP10 (adopted October 2011) requires development to make adequate provision for all users, including car parking.

7.4.2 The proposed flags would be flown from the existing flag poles which are set well above the level of the public footway and carriageway. As such, the flying of flags would not result in any obstruction to pedestrian movement or vehicular visibility, nor would it impede access along the existing adjacent highways. The flags are not considered to interfere with driver site lines or create any distraction or hazard to highway users. Given their elevated siting, modest projection, and lightweight nature, the proposal is not considered to result in any demonstrable harm to public safety in accordance with the Town and Country Planning (Control of Advertisement) Regulations 2007 (as amended) and CP10 of the Core Strategy (Adopted October 2011).

7.5 Consent:

7.5.1 Part 3, Section 15(b) of the Regulations sets out that any consent granted shall expire where no period is so specified, at the end of a period of 5 years. It should be noted that following the expiration of the 5 year period, deemed consent is granted by Schedule 3, Class 14 of the Regulations, unless it would contravene a condition subject to which express consent was granted or an application for renewal of consent has been refused. The conditions relating to Class 14 state that the terms of the express consent, including any conditions to which it was subject, shall be treated as applying to the continued display.

8 **Recommendation**

8.1 That ADVERTISEMENT CONSENT BE GRANTED subject to the following conditions:

C1 Standard advertisement conditions:

1] No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

2] No advertisement shall be sited or displayed so as to;

(a) Endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);

(b) Obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or

(c) Hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

3] Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

4] Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

5] Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity

Reason: To comply with the Town and Country Planning (Control of Advertisements) Regulations 2007 (as amended) and in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011).

C2 The flags hereby permitted to be displayed at the application site(s) shall only include those listed at TRDC01 (Amended List of Flags) and shall not exceed a size of 1.6m in length by 1m in width.

Reason: For the avoidance of doubt, in the proper interests of planning in accordance with the requirements of the Town and Country Planning (Control of Advertisement) Regulations 2007 (as amended), Policies CP1, CP9, CP10 and CP12 of the Core Strategy (adopted October 2011) and Policies DM3, DM6 and DM9 of the Development Management Policies LDD (adopted July 2013).

8.2 Informative

I1 The applicant is hereby advised to remove all site notices on or near the site that were displayed pursuant to the application.