Batchworth Community Council (BCC) Comments with Place Services provisional responses.

Bold requires instruction or input from Three Rivers:

No.	BCC Comment	PS Comment (internal)
1	In Section 2 Planning Policy Context, the draft document currently references the old version of Three Rivers District Local Plan and should be updated to reflect the version of the Local Plan recently published as part of the Reg 19 consultation.	New sentence added to Section 2 para 2.1.5
2	Section 2 should also reference the Batchworth Neighbourhood Plan (2023-2028) which covers the Rickmansworth Conservation area and is a material consideration in the determination of planning applications. This should be clearly recognised throughout the document. Suggested wording might include: "Batchworth Community Council's Neighbourhood Plan contains the Batchworth Neighbourhood Design Code which gives guidelines and codes which are expected to be followed and used as a reference point against which to assess planning applications. The Rickmansworth Town Centre Concept Plan further develops the Batchworth Neighbourhood Design Code, illustrating high level ideas and potential strategies for change in the town centre. Applicants for development in the town centre are expected to refer to the Concept Plan."	New sentence added as para 2.1.8 to reference the Neighbourhood Plan as part of the Local Plan. The more detailed point about the Batchworth Neighbourhood Design Code has been added to Section 7 'Management Proposals' under para 7.2.5.
3	The list of Locally Important Buildings (para 8.4 on pages 81-82) should be reviewed to ensure it is accurate and up to date. Several building references are now incorrect; for example, Barclays Bank is now a restaurant, The Hogs Head is now	This has now been updated.

	occupied by Costa Coffee, and the reference to Chequers Restaurant is also inaccurate.	
4	The Table at 3.3 identifies several other buildings of architectural interest and we support their inclusion in the list of locally important buildings.	This point is acknowledged.
5	There are inconsistencies within the document that require clarification. Page 64 refers to the height of buildings, while page 72 refers to tall buildings. Consistent terminology should be used throughout, and the document should reflect the new Local Plan by making it clear that buildings within the conservation area should generally be limited to no more than three storeys.	These sections refer to slightly different considerations but, in both instances, emphasise the importance of the prevailing context in considering appropriate building heights.
6	BCC considers that there should be a stronger Management Plan. The section on maintenance should clearly explain the powers and tools available to TRDC and set out how proposals will be implemented and enforced. A clear methodology or Action Plan should be included, covering implementation, the application of the design code, consistent terminology, accurate building references, and the reinstatement of materials following utility works to ensure they match the existing historic materials. The document should also specify appropriate materials for footpaths, roads, seating and signage to ensure consistency whenever maintenance works are undertaken.	Section 7.2 addresses 'Development Management Tools' including enforcement and implementation. The points on methodology/Action Plan/ Design Codes are acknowledged but are beyond the remit of this document.

7	Article 4 Directions should be clearly referenced and adhered to, as they are essential in maintaining a coherent approach to planning within the conservation area. Furthermore, the Conservation Area guidelines should apply to the entirety of buildings, not simply the shopfronts. This should include rear elevations, wider views, plant equipment such as HVAC units, traffic impacts and service areas including bin stores. For example, at McDonald's, balconies now overlook HVAC equipment and traffic has increased, demonstrating the importance of considering the wider setting of development.	There is an existing Article 4 Direction in place in relation to change of use which is referred to in para 2.3 of the draft CAA. A definition of Article 4 Directions is provided on p84. Section 7.2.14 raises the potential for an extension to the Article 4 Direction to restrict further alterations within residential areas under permitted development, including extensions or alterations to elevations fronting a road (including side elevations on corner properties), creation of hard surfaces, and removal and replacement of front boundary walls, and the installation of satellite dishes on the front of houses. The point in relation to service yards and the entirety of buildings is acknowledged and an additional paragraph has been added at 7.4.17. Views and setting are covered already in 7.4.18.
8	BCC also considers that the Management Plan should promote a consistent approach to building finishes, railings and other streetscape details, referencing the approach adopted in the Neighbourhood Plan. At present there are inconsistencies, such as the cobbled paving at one end of the High Street compared with standard paving on the opposite side. A clear specification for materials used throughout the conservation area would help preserve its character and appearance.	This is covered to some extent under Chapter 6 ‘Opportunities for Enhancement’ which mentions street furniture and surfacing as requiring improvement, also in 7.5 ‘Public Realm and Highways, which identifies the importance of maintaining appropriate street surfaces, signage etc. as a general point in terms of public realm

9	The draft makes little reference to existing environmental policies or how they will operate within the conservation area. The Local Plan contains guidance on provision of sustainable energy and reduction of emissions in new and existing buildings. This should be referenced in the draft together with clear guidance on balancing environmental objectives with the need to preserve the character and appearance of the conservation area. BCC would welcome future liaison with TRDC regarding the implementation of sustainable energy measures, including electric vehicle charging infrastructure. Any such proposals should be guided by a cohesive strategy that aligns with both the Local Plan and the Batchworth Neighbourhood Plan, ensuring that new infrastructure is sensitively designed and does not detract from the historic street scene.	Sustainability/ energy efficiency is covered in the Management Plan para 7.4.5 which has now been updated to address heat pumps, solar panels and EV charging equipment.
10	The draft refers to a future review of the district's conservation area boundaries. BCC proposes that such review considers extending the existing boundaries to include additional areas adjacent to Rickmansworth Town Centre and its environs and Nightingale and Cedars Avenue conservation areas. We also request that a future boundary review considers the inclusion of parts of Mill End together with an Article 4 Direction to restrict the scope of permitted development rights and changes of use from town centre to residential and office to residential. Areas in the locality bordering the River Colne should also be considered in the review.	Nightingale Road, Cedars Avenue and Mill End could be added later to the Conservation Area boundary. However, these are separate distinct areas that would benefit from being treated separately: the existing Nightingale Road, Upper Nightingale Road and Cedars Avenue Conservation Areas have a more coherent architectural character and so would be better operated as separate Conservation Areas. Mill End is geographically removed from the historic centre of Rickmansworth, separated by a large amount of built form which does not have special interest and so its inclusion would be contrary to policy. NPPF HE2.1: 'Conservation Areas and World Heritage Sites' states that: '*When considering a new or amended conservation area designation, local planning*

		authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.' The point on extending Article 4 Direction is acknowledged, but this is not directly a heritage consideration and so is beyond the remit of this report.

From public consultation:

Need for better enforcement of regulations on public realm and for political consensus on these issues.

Response: A note on Planning and Highways Authorities work together to help conserve the existing character of the Conservation Area where appropriate has been added to para 7.5 'Public Realm and Highways.

Place Service's RESPONSES TO PUBLIC CONSULTATION

Respondents were all public except Rickmansworth Town Team & Rickmansworth Waterways Trust

Place Services response shown in purple for clarity:

Summary of Public Response on- What areas and spaces make Rickmansworth special to you?

- The Aquadrome
- Grand Union Canal
- River Chess and Colne/Colne Valley
- Mill Stream/Mill End
- Chorleywood Common
- Also, towpaths, riverside walks etc associated with the above.
- Generally open spaces including parks, woodland and Green Belt for recreational use.

Historic areas and buildings were also mentioned which includes:

The historic centre of Rickmansworth in general with specific mentions of the High Street, Church Street, The Bury, St Mary's Church, Joan of Arc School historic pubs including The Feathers and historic streets including Ebury and Talbot Road,

More limited mentions of:

- Bury Grounds
- Chorleywood House Estate
- Houses along Uxbridge Road

Place Services Response to-What areas and spaces make Rickmansworth special to you?

- The areas and spaces identified are acknowledged.
- Many of the popular natural locations are beyond the historic centre of Rickmansworth and so are excluded from the proposed Conservation Area.
- The Mill Stream has been mentioned in the Batchworth CC response and will be addressed in responses to the last question.
- The more historic built structures and areas identified above are strongly featured in the draft CAA.

Are there any changes would you like to see in the future?

- Protect and maintain waterways, includes those identified above such as Colne Mill Stream and Aquadrome.
  These points are acknowledged and the waterways are largely outside the Conservation Area and covered by separate legislation and policy.

- Regenerate the High Street – improved shop fronts, more independent and varied businesses, fewer repetitive uses, better station-to-centre arrival and a stronger café, market and events offer and general public realm, street furniture, litter, graffiti etc.
  This point is agreed and in relation to shopfronts and public realm is reflected in CAA Section 6 on Opportunities for Enhancement and under Management Proposals, which emphasise the importance of improving shopfronts. However, there is limited legal control in the GPDO measures for controlling the types of retail occupier within the High Street.

- Limit to harmful development- Protection of Green Belt land, sensitive height and design controls, protection of historic views and resistance to demolition or inappropriate alteration.
  The points are acknowledged. There is no Green Belt within the proposed Conservation Area, but important historic views are covered in Section 5 and appropriate new development is considered in Section 7 of the draft CAA.

- Improve walking, cycling and traffic management –Pedestrianisation, underpass at Ebury Way, safer cycling, lower traffic dominance, traffic calming and better links between the town, station, Aquadrome and canal,
  The points are acknowledged. Improvement of public realm is covered in Section 6 'Opportunities for Enhancement' and under Section 7.5 Public Realm and Highways. Wider routes are beyond the remit of the CAA but are addressed throughout the Batchworth Neighbourhood Plan which covers a larger geographical area.
- Strengthen heritage controls and participation- enforcement, more public notice of conservation issues and stronger civic ownership.

The points are acknowledged. CAA para 7.2.15 covers the use of Enforcement where appropriate permissions have not been sought for changes.

- Better design standards, and restrictions on taller buildings

  The points are acknowledged. CAA chapter 7.4 looks in details at Managing Future Change to ensure good quality future development, which includes taller buildings. Batchworth Neighbourhood Plan separately has requirements in relation to design quality in the town centre.

- Request for inclusion of the Batchworth Lock; Mill Stream; Cedars Estate

  This is addressed under responses to 'Do you feel the boundary covers buildings of historic and architectural value…etc' below

- Request for national listing of Halfway House pub listed

  This point is acknowledged but is outside the remit of this study. It should be referred directly to Historic England

What potential issues (if any) do you think the Conservation Area faces?

Overdevelopment: loss of green space, unsympathetic buildings, excessive height, demolition and damage to landscape setting and historic views. Infrastructure and population pressure related to traffic, parking, water supply, sewage capacity and runoff are viewed as risks when development outpaces infrastructure.

The point is acknowledged; the CAA addresses the importance of green space, good quality design and important views.
The CAA addresses traffic and parking under 7.5 'Public Realm and Highways'. However, development more widely in the district is beyond the remit of the draft CAA.

Water decline and ecological risk

Low or absent flows, overgrowth, flooding, climate change, pollution, sewage discharge and wildlife loss, particularly for the Mill Stream and Colne system.

The points is acknowledged; this relates largely to areas outside the CAA

Need for better enforcement of regulations on public realm and for political consensus on these issues.

The point is acknowledged; the CAA addresses enforcement measures in CAA para 7.2.15. The importance of public realm is emphasised throughout the CAA and additional note on co-operation between planning and highways authorities has been added.

Climate change and need for energy efficiency measures

The point is acknowledged; the CAA addresses scope for energy efficiency measures. Further update will be given on specific energy efficiency measures.

Excessive regulation in relation to smaller alterations such as front porches.

The point is acknowledged. The CAA addresses the importance of good design and Historic England has further information on conservation areas and their designation and principles. Extensions and adaptations to houses and other buildings will still be permitted where they preserve the character of the Conservation Area.

Do you feel the boundary covers buildings of historic and architectural value? Should some be removed, or others added?

Suggested areas to be excluded

Remove The Cloisters

The point is acknowledged, but The Cloisters is a well-preserved example of interwar architecture that represents the towns development and is in a relatively central location and is considered appropriate for inclusion.

Telephone Exchange/ should only be merited if it retains its windows as this is part of the special interest.

The point is acknowledged, and inclusion in the Conservation Area will give greater likelihood that the special interest of the building will be maintained.

Cedars Estate has lost charm and consistency over the years as its not within a conservation area.

The point is acknowledged. The Cedars Estate including Cedars Avenue and Nightingale Road have their own separate Conservation Area designation.

Suggested areas to be included:

No. It does not cover Our Lady Help of Christians Catholic Church, which is a listed building. This could easily be included.

The point is acknowledged. However, the boundary is focused on the historic town centre which developed south of the railway line. The special interest of the church is acknowledged, but it is a nationally listed building and therefore has its own separate statutory protection.

Add in Rickmansworth Station

The point is acknowledged and the Station has been included in the draft CAA.

Ricky Station, St Mary's Church,

The station and the church are within the proposed Conservation Area boundary.

Batchworth Lock house and Canal Buildings, cottages. The Ebury Way.

The special interest of Batchworth Lock house is acknowledged, but there is a large extent of modern development and roads separating this from the historic town centre and as a nationally listed building it has its own separate statutory protection.

The Ebury Way extends out of the historic town centre, and it is a rural footpath so is not suitable for inclusion, but it is likely to have its own protection under a separate classification.

The canal, Mill Stream/Mill End and Aquadrome

The special interest of these features and locations are acknowledged, but due to their separation from the historic town centre due to roads or more modern development, their inclusion in the Conservation Area is not considered appropriate.

Money Hill Parade

Money Hill Parade is quite far from the historic town centre of Rickmansworth. Inclusion of outlying areas would be likely to reduce the overall special interest and effectiveness of the Conservation Area.

Cedars Estate.

This is under a separate Conservation Area designation

More Metroland housing areas as this is the special characteristic of the area.

The point is acknowledged, but inclusion of outlying areas outlying areas would be likely to reduce the overall special interest and effectiveness of the Conservation Area.

General/Boundary Comments

I think the old tree pub should just be knocked down and the site sold to developers for housing which is so badly needed

The point is acknowledged, as a Grade II listed building it is has its own separate statutory protection and is outside the proposed Conservation Area boundary

We should not remove anything/ Don't know/No

The responses are acknowledged.

As there is nowhere else to put this. There is a bad error in section 4.212. The Ebury Railway was originally intended to go from Watford to Uxbridge but only reached Rickmansworth. This may have been because it reached the Grand Union Canal and did not need to go further. However, it closed in 1967 NOT 1867. It was open a lot longer than 4 years and was successful, to some degree! I know someone who travelled on it and he is still alive!

The point is acknowledged and this reference is no longer there.