



# Sarratt Neighbourhood Plan

## 2024 – 2039



# Consultation Statement

*February 2025*

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## 0. Glossary

HCC	Hertfordshire County Council
NPA	Neighbourhood Plan Area (designated 22/07/2019)
NPWG	Neighbourhood Plan Working Group
SNP	Sarratt Neighbourhood Plan
SPC	Sarratt Parish Council
TRDC	Three Rivers District Council

# 1. Purpose

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2). Part 5 of the Regulations sets out what a Consultation Statement should contain, specifically:

- (a) details of the persons and bodies who were consulted about the proposed neighbourhood plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted;
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.



## 2. Engagement Strategy

Engagement with the local community started at the genesis of the Sarratt Neighbourhood Plan (SNP).

The idea to develop a neighbourhood plan arose out of the publication of the 2018 Parish Plan, commissioned by Sarratt Parish Council (SPC), that identified a number of areas in the community where there were strong views, including housing. However, the Parish Council were keen that this was not perceived as solely a Parish Council initiative but wanted to engage with the broadest possible set of stakeholders in the community.

The Parish Council wanted the initiative to be *community-led* and resolved in late 2018 to set up a Neighbourhood Plan Working Group (NPWG), with representation from the whole community and with an independent chair. An advert for volunteers was placed in the parish newsletter (*Spotlight*) in February 2019 and a working group of six parishioners was established in March 2019 with Terms of Reference set by the Parish Council. The first meeting was held in public session in Sarratt Village Hall in April 2019 – a practice which the working group maintained throughout its work except for a period during Covid-19 lockdown periods when public meetings were banned.

The initial meetings established a plan process, with 8 distinct stages, and a strategy to engage in consultation with the local community. The aims of the Sarratt Neighbourhood Plan (SNP) engagement strategy were to:

- (a) Involve as many people and stakeholders in the community as possible in order to obtain their views about their community's future development;
- (b) Help inform the development of the neighbourhood plan's objectives;
- (c) Encourage awareness and engagement in the process by using a wide variety of communication and consultation methods;
- (d) Ensure the process was transparent, accessible and progress was regularly communicated via the local parish newsletter, our webpage and local posters.
- (e) Build an evidence base and local support for the neighbourhood plan policies.

The focus of the engagement strategy in the early stages of the plan process was to obtain local views, building on the 2018 Parish Plan survey which was

provided to every household in the parish (and hence Neighbourhood Plan Area), particularly to help inform the Neighbourhood Plan's objectives.

This included engaging with a cross-section of parish stakeholders, including local businesses, voluntary and community organisations and attendance at the Sarratt Freshers Fair (a bi-annual community event) in order to solicit individuals' views.

Later in the plan process, engagement oriented around formal consultations, including two Regulation 14 and two Regulation 16 consultations, where responses from the local community, TRDC and statutory consultees were received.

### 3. Consultation timelines

Feb 2019	Advert for volunteers to join Neighbourhood Plan Working Group
Mar 2019	<i>Neighbourhood Plan Working Group established</i>
Apr 2019	<i>Initial meeting of Neighbourhood Plan Working Group</i>
Jun – Jul 2019	Consultation meetings with local businesses & community groups
22 Jul 2019	<i>TRDC formally designated the Sarratt Neighbourhood Plan Area</i>
Nov 2019	Informal public consultation – stand at Sarratt “Freshers Fair”
Mar 2020 – Mar 2021	<i>Covid-19 lockdowns prevented in-person public consultations</i>
Aug 2021	8-page (A5) leaflet delivered to every household in the Neighbourhood Plan Area (see Appendix i), outlining draft plan policies, inviting residents to attend public consultations on 6 or 11 Sep 2021 or to submit their comments back directly.
Sep 6 2021	Weekday pre-submission public consultation in Sarratt Village Hall
Sep 11 2021	Weekend pre-submission public consultation in Sarratt Village Hall
Sep 13 2020 – Oct 31 2021	Regulation 14 consultation including public and statutory bodies
May 2022	<i>NPWG adopts changes to proposed policies resulting from Regulation 14 consultation feedback.</i>
Aug 15 2022 – Sep 25 2022	2 <sup>nd</sup> Regulation 14 consultation including public & statutory bodies
Jun 27 2023 – Aug 8 2023	TRDC Regulation 16 consultation
Aug 31 2023	<i>Notification that external examination of SNP commenced.</i>
Sep 15 2023	External examination of SNP paused.
Nov 2023	<i>Death of Chairman of Neighbourhood Planning Working Group</i>
Dec 2023	<i>Establishment of Sarratt Parish Council Neighbourhood Plan sub-committee</i>
Feb 2024	<i>Sub-committee provides responses to external examiner’s queries.</i>

July - Aug 2024 2<sup>nd</sup> TRDC Regulation 16 consultation

*Nov 2024 External examiner's questions received.*

*Jan 2025 Sub-committee provides responses to external examiner's queries.*

*Feb 2025 External examination recommences (TBC)*

Mar-Apr 2025 3rd TRDC Regulation 16 consultation (TBC)

May 2025 TRDC Decision Notice (TBC)

July 2025 SNP Referendum (TBC)

## 4. Communication channels

In accordance with the engagement strategy's aim to involve and include as many people and stakeholders in the community as possible, a range of communication channels were deployed during the various consultations. It is of particular note that the NPWG felt that considering the diverse mix of residents – including many older generation who may not be as online savvy - to be as inclusive as possible, it was important that both online and in-person events and feedback mechanisms should be provided.

Channels deployed included:

- All Neighbourhood Plan Working Group meetings held in public at Sarratt Village Hall (except during Covid-19 lockdown) and advertised locally.
- Posters to advertise NPWG meetings, consultation events or requesting feedback put up on Parish Council noticeboard, village shop noticeboard, and at the bus stop, including requests for nominations of key views etc.
- NPWG meeting updates and notices published regularly in the local newsletter (*Spotlight*) delivered to every household monthly.
- Leaflet drop to every household (800+ properties) informing of proposed policies and inviting to public consultation events (Sep 2021).
- Two face-to-face public consultation events at Sarratt Village Hall (Sep 2021) – one week day, one weekend - where large print policies were displayed and one-to-one discussions held.
- Attendance (stall) at Sarratt Freshers fair (Nov 2021) to raise awareness and answer questions from the general public.
- Formal written letters to statutory consultation bodies.

- Dedicated website ([sarrattneighbourhoodplan.org](http://sarrattneighbourhoodplan.org)) set up to provide access to latest documentation, including consultations, and feedback comments.
- TRDC website for Regulation 16 consultation.
- Mechanisms to capture feedback setup, during consultations, including a dedicated email address and ability to send by post to the parish council, or drop off in a dedicated feedback box at the local village shop.
- Individual meetings with key stakeholders, including local businesses and community & voluntary organisations to solicit their views.
- Regular updates to the Parish Council at their public meetings and hence further updates both minuted and published in summary form in their monthly report in *Spotlight*.
- Additionally, all NPWG members were available throughout the period to answer questions directly from community members. (Given this is a small rural parish of c.2,200 residents where people tend to know each other and meet at local organisations' events or whilst carrying out work in the community (e.g. voluntary work in the village shop), it was an important albeit informal part of the consultation process).

## 5. Consultation Process

In the early stages of the plan process, the focus was on raising awareness and engagement with key stakeholders. Individual meetings were held with local businesses and community & voluntary organisations to solicit their views. The groups approached were from a cross-section of the community including local businesses (e.g. pubs), religious organisations (e.g. Holy Cross church) and voluntary groups (e.g. Wildlife Volunteers, Sarratt Care, Sarratt Local History Society).

The questions asked were:

- a. What do you value about Sarratt?
- b. What would you want to protect?
- c. What would you want to improve?
- d. What do you need in order to be sustainable over the next 15 - 20 years?
- e. What are your key objectives for the next 5 years?

The outputs from this exercise were collated, together with the results from the 2018 Parish Plan survey, which was sent to every household in the parish (Neighbourhood Plan Area) with a response rate of 26%, to construct a set of objectives for the plan, centred around three themes: Economic; Social; Environmental.

The draft objectives were informally floated at a stand at the Sarratt Freshers Fair and the verbal feedback used to further refine the objectives and inform the emerging draft policies.

Once the draft policies had been formulated, together with further input from Bell Cornwell (appointed as consultants to the NPWG) and AECOM, engaged to deliver a Housing Needs Assessment (HNA) and Design Codes, an informal public consultation was arranged and publicised.

To facilitate this pre-submission consultation and to ensure that people attended best informed and having had time to consider the proposed policies, an 8-page (A5) leaflet (see Appendix i) was delivered to every household in the Neighbourhood Plan Area (800+ properties), outlining the draft plan policies and/or to submit their comments directly.

The public consultation was held in the village hall on two days – one weekday, one weekend – where the policies were printed on display boards and NPWG members were available for informal discussions. Feedback was collected in written form on the days and could also be submitted afterwards online, email or hard copy via the dedicated drop-box in the village shop or Parish Council office. ALL feedback was submitted into the Regulation 14 consultation.

For clarity, the Plan was available to view in Sarratt Village Hall on the two days of public consultation, online ([sarrattneighbourhoodplan.org](http://sarrattneighbourhoodplan.org)), had been delivered in summary form by leaflet to every household in the Neighbourhood Plan Area, plus there were hard copy versions available to view in the Parish Council office.

The formal Regulation 14 consultation also included notifying in writing all appropriate statutory bodies (see Appendix ii) and the subsequent review of the feedback received and the NPWG discussions on how to adapt the draft



policies as a result were held in open public sessions at the regular NPWG meetings.

Subsequent to the changes adopted from the first Regulation 14 consultation, TRDC provided further feedback in November 2021 and a response was provided in May 2022. Following a number of discussions the Plan was amended to reflect that feedback and reissued by August 2022. As such, it was agreed with TRDC that a second Regulation 14 consultation was appropriate.

However, since the changes primarily affected mainly technical aspects raised by TRDC and was not judged to materially impact the views of the public previously consulted, this was conducted online-only on our dedicated website, again with additional local publicity (posters etc). This was held Aug-Sep 2022.

A Regulation 16 consultation was held by TRDC in June to August 2023, where a dozen comments were received, most notably from HCC on footpaths and bridleways that were adopted together with a few other minor changes.

Following feedback from the external examiner in September 2023, the process was paused following the untimely death of the Chairman of the Neighbourhood Plan Working Group. Re-established under a sub-committee of the Parish Council, responses were provided to TRDC in February 2024 and a second Regulation 16 consultation was held July to August 2024.

Subsequent to further questions of clarification from the external examiner, the final submission of the Sarratt Neighbourhood Plan was made in February 2025 with a view to holding a final Regulation 16 consultation in April 2025.

## 6. Consultation Outcomes

The feedback from the first (2021) Regulation 14 consultation, including the two in-person events, is summarised as follows:

- 58 people attended across the two public consultation days.
- 56 comments were received in total, including written responses from statutory consultees, of which 40 were specific to individual draft policies.
- 3 explicitly supportive comments on the draft neighbourhood plan, including: *“I think this is a splendid plan ... It is also good to have involved the local community and to be taking comments seriously.”*
- No feedback received objecting to the plan or any individual policies.
- Majority of comments received were on renewable energy, green infrastructure and environmental assets as well as housing mix.
- 12 draft policies were amended as a direct result of the public consultation.

The breakdown of comments received by policy was:

• Development sites	2
• Design Principles	1
• Historic Character	0
• Housing Mix	10
• Environmental Assets	5
• Footpaths and Bridleways	3
• Community Facilities	3
• Car Parking	3
• Local Green Spaces	1
• Renewable Energy & Green Infrastructure	12
• New Settlements	0

In response to this feedback, this resulted in a significant beefing up of the Renewable Energy & Green Infrastructure policies, particularly in light of the underweight of such policies in the existing Local Development Framework

(2011). The full list of anonymised comments received, together with resultant changes to proposed policies is shown in Appendix iii.

Unsurprisingly, given that many public comments had been registered in the first Regulation 14 consultation, the second Regulation 14 consultation did not elicit many responses, with just three received in total including statutory responses from Herts County Council and The Coal Authority, and one from a local resident suggesting an assessment on the impact of road traffic and road safety, which was discounted on the basis it was not within the remit of a neighbourhood plan.

However, the first Regulation 16 consultation held in summer 2023, did generate 12 responses. These were mostly from statutory consultees (7) mainly with generic replies, plus 5 local residents (4 supportive, 1 relating to crime prevention), and one on behalf of a property developer who was appealing a planning application in the Neighbourhood Plan Area.

The comments and response to each can be seen in Appendix iv. Feedback from HCC on public rights of way was accepted and adopted and the Plan reissued ahead of the second Regulation 16 consultation (2024).

For completeness, the comments and responses from the second Regulation 16 consultations in 2024 are attached in Appendix v.

# Appendix i

Copy of leaflet distributed to every household prior to 2021 Reg 14 consultation (attached).

# Neighbourhood Plan Consultation Meetings

**Monday 6 September 11am - 1pm and  
Saturday 11 September 11am - 1pm**



*Your chance to tell us what you think  
- and help shape our community for the future*

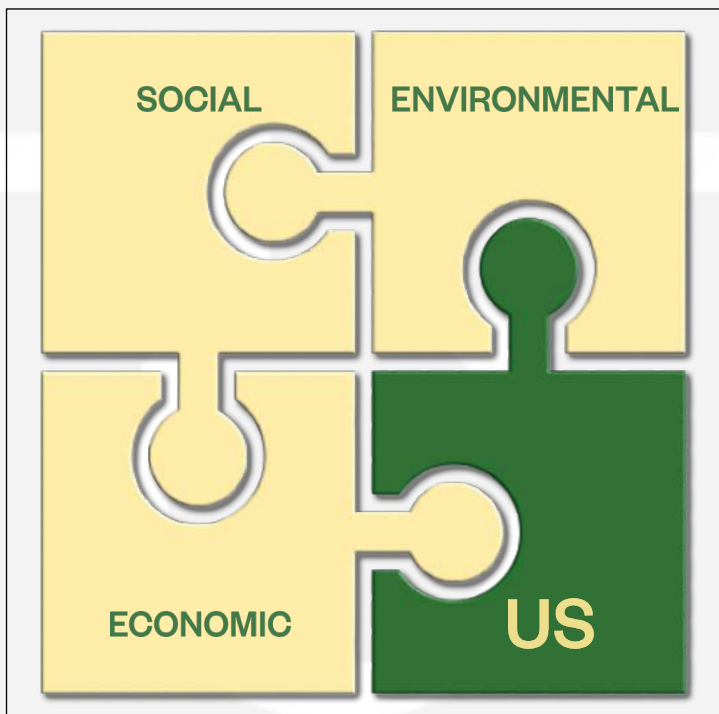
# The Neighbourhood Plan: Three Questions...

## What is the Neighbourhood Plan?

The Neighbourhood Plan is a set of policies that **must** be considered by TRDC when making their planning decisions. The policies will direct development and the use of land in our parish. The plan must reflect the needs and expectations of the people of the parish, and you will have the opportunity to vote for the adoption of the final version of plan in a public referendum.

## Why should I come to the consultations?

A community led working group was formed in 2019 to put the plan together. The purpose of the working group was to work with the local community (in other words - with all of us) to create a plan that will protect and improve the **social, environmental and economic wellbeing** of the area and all those residing and working in it - that's us again. The working group has used a wide variety of sources, such as, previous parish surveys, questionnaires and independent reports to put together a set of draft of policies. Now we need your input. Given the demand for new housing in this area these policies will determine the way our community grows. **So tell us what you think:** do the policies we have proposed meet your needs and expectations of the future?



## What is the Plan trying to do?

The evidence gathered so far from community sources suggest three principal objectives for the Neighbourhood Plan:

## ...and Three Objectives

### ECONOMIC

#### **Maintain the viability of key businesses and services.**

This is achieved by ensuring any property development in the parish consists of a mix of properties that best meets the housing needs of the community promoting a thriving and balanced population that will maintain the viability of these businesses and services. *This is the focus of policies 4, 8 and 11.*

#### **Key Businesses and Services**

- Village Shop
- Pubs
- Garage
- Doctors' Surgery
- Bus Service
- School
- Church

### SOCIAL

#### **Ensure community spirit is supported and enhanced.**

This is to be achieved through:

##### ***Protecting sites important for community interaction.***

*This is the focus of policies 6 and 7*

If the community grows, ***ensuring there is adequate provision of facilities for community interaction.***

*This is the focus of policy 11.*

***Developing a housing stock that meets the needs of the whole community.***

*This is the focus of policies 4 and 11.*

#### **Community Interaction Sites**

- Village Hall
- Church
- KGV Playing Fields

### ENVIRONMENTAL

#### **Maintain the rural nature of the village and conserve its important historical and environmental features.**

*This is the focus of policies 2,3, and 9*

##### **Protect Environmental assets.**

*This is the focus of policies 5 & 9.*

##### **Protect the distinctive nature of Parish settlements.**

*This is the focus of policies 1 and 2*

##### **Reduce the community's contribution to climate change.**

*This is the focus of policy 2.*

##### **Promote the use of renewable forms of energy.**

*This is the focus of policy 10.*

##### **Preserve the character of the settlements within the Parish.**

*This is the focus of policy 3.*

##### **Minimise the impact of any development upon traffic in the area.**

*This is the focus of policies 2 and 8.*

#### **Key Assets**

- Church
- Ancient Settlement
- Conservation Area
- Listed Buildings

#### **Environmental Assets**

- AONB
- 2 SSSIs
- 4 county wildlife sites

# What are these draft policies?

## 1. Development Sites

In order to protect the historic look and village feel of the core village of Sarratt and hamlets of Belsize and Bucks Hill, developments will be required to be limited to infill and suitably located brownfield sites within the existing settlement only (not open fields or edge of settlement).

If land for a new settlement is proposed by Three Rivers District Council through the Local Plan Review, this will be subject to the criterion set out in Policy 11.

## 2. Design Principles

Development proposals will be required to adhere to the design guidelines in the Sarratt Design Code report (January 2020 or subsequently updated, and available for download from the SPC website).

## 3. Historic Character

Development proposals within or affecting the setting of the Green Conservation Area and Church End Conservation Area, should conserve and enhance their distinctive characters in accordance with the Green, Sarratt Conservation Area Appraisal 1994 and the Church End, Sarratt Conservation Area Appraisal 1994. Development that adversely affects the important views in and out of the Conservation Areas will not be supported.





#### 4. Housing Mix

Social rented homes for those on the lowest incomes are the greatest priority in Sarratt, with a supply of affordable routes to home ownership and accessible homes for the elderly an important consideration.

##### **Housing Mix**

- a) Development proposals\* of: [4] units or over will be required to have at least [50]% as Affordable Housing;
- b) Proposals for Affordable Housing<sup>2</sup> will be required to be 70% for social or affordable rent and 30% for affordable home ownership products.
- c) Affordable Housing of all types will be required to be provided with a Locality Protection Provision, whether or not part of a Rural Exception site.
- d) Affordable homes will be integrated into developments in design, layout and location so as not to be distinguishable from other homes on the development.
- e) Development proposals over [5]3 units should have a size mix comprising of dwellings of three bedrooms (50%), one bedroom (20%) and two bedrooms (30%).
- f) Development proposals where the provision of bungalows, accessible homes and all types of self-build properties as part of the allocation mix above will be looked upon favourably if they are in accordance with the other policies of the Plan provided they are 3 bedrooms or less and are subject to permitted development rights being removed to prevent future development into larger dwellings being possible without planning permission.
- g) The artificial restriction of site areas or inefficient use of land to avoid the affordable housing or housing mix thresholds is not acceptable, as proper planning of an area requires a comprehensive approach. Sites in the same ownership (or with an ownership relationship) will be treated as a single planning unit. Sites which have a clear relationship in physical terms will be treated as one site, such as adjacent underused sites, even if they are in different ownerships.

#### 5. Environmental Assets

- a) Biodiversity - All development proposals will be required to deliver a biodiversity net gain or will not be supported.
- b) Landscape character – Development proposals will be required to respect and wherever possible enhance the special characteristics, value and visual amenity of the parish landscapes.

#### 6. Footpaths and Bridleways

Development proposals that would result in the loss of a public footpath or bridleway will not be supported. Where a proposal requires an existing footpath or bridleway to be re-routed, this will be required to be an equivalent or better alternative provision in terms of distance, quality and in an equally suitable location to service its existing function.

## 7. Community Facilities

Development proposals that would result in either the loss of, or have a significant adverse effect on an identified Community Facility (including the removal of parking provision) will not be supported, except where:

- a) It can be demonstrated that its continued use as a community facility is no longer viable or is no longer required by the community and that there is no reasonable prospect of securing an alternative community use of the land or premises; or
- b) Equivalent or better alternative provision in terms of quantity and quality and in an equally suitable location in the Parish either already exists or is being provided.

### Community Facilities

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• Holy Cross Church</li><li>• Sarratt C.of E. Primary School</li><li>• KGV Playing Fields</li><li>• Sarratt Community Post Office Stores</li><li>• Sarratt Village Hall</li><li>• Doctors' Surgery in Church Lane, Sarratt</li><li>• The Cricketers Public House, Sarratt</li><li>• The Boot Public House, Sarratt</li></ul> | <ul style="list-style-type: none"><li>• The Cock Public House, Sarratt</li><li>• The Plough Public House, Belsize</li><li>• The Cart &amp; Horses Public House, Commonwood</li><li>• Prime Steak House, Chandler's Cross</li><li>• The allotments in Church Lane, Sarratt.</li><li>• Any other facility registered as an Asset of Community Value.</li></ul> |
|--|--|

## 8. Car Parking

Development proposals that result in a reduction in car parking provision in Sarratt village will **not** be supported except where:

- a) It can be demonstrated to the satisfaction of the Three Rivers District Council in consultation with Sarratt Parish Council and the Highway Authority that the loss of parking will not have a severe adverse impact on parking provision and/or road safety in the village; or;
- b) Adequate and suitable replacement car parking provision is provided on or adjacent to the site or a nearby suitable location in the village.



9. Local Green Spaces

The management of development within areas of Local Green Space will be consistent with that for development within Green Belt.

Local Green Spaces	
• The Green, Sarratt	• Whippendell Wood (SSSI)
• KGV Playing Fields	(Watford Borough Council)
• Dawes Common	• Scrubbs Wood*
• Commonwood Common	• Great Wood*
• Penmans Green	* Privately Owned

10. Renewable Energy & Green Infrastructure

All development within the parish should seek to achieve the highest standards of sustainability. The use of the following will be positively encouraged:

- a)Renewable and low-carbon or zero carbon technologies such as solar panels and ground source heat pumps;
- b)Techniques such as passive solar design, choice of construction materials and standard of construction, as well as aspect and orientation of layout, such as south-facing roof slopes to maximise the use of solar photovoltaic panels,;
- c) Locally produced (e.g. flints) and recycled materials (e.g. old bricks) to both meet design guidelines and have a lower carbon footprint due to fewer transport miles.
- d) Steps to encourage the use of sustainable modes of transport – including walking, cycling and public transport;
- e) Electric charging points should be installed for all new residential developments. Their eventual configuration and charging capacity should be appropriate to the development, from single charging points for individual houses to communal points for flats or shared parking areas;
- f) Ensuring that the development will facilitate the use of, and recycling of, all resources including water, such as the provision of water butts and grey water recycling.

11. New Settlements

If the District Council allocates a site in Sarratt Parish (which is not a Rural Exception Site) this should be delivered as follows:

Each allocated site will be master-planned and delivered as a whole to achieve a comprehensive development that ensures the timely and coordinated provision of infrastructure, services, open space and facilities. A single planning application will be submitted for each allocated site, either an outline or full application, to ensure this comprehensive approach to development is achieved.

Development will respond positively to the local context, ensuring a high quality of design that responds effectively to the character of the surrounding area. Necessary infrastructure will be provided at a rate and scale that meets the needs that arise from the development as a whole.

# Questions?

# Comments?

## We want your views!

**Make a note here:**

**you can cut it out and hand it in at one of the Consultation Meetings:**

**Monday 6 September (11am - 1pm) and**

**Saturday 11 September (11am - 1pm) in the Village Hall**



### Acknowledgment

The Neighbourhood Plan Working Group would like to thank these groups for their help and advice during our work:

- Holy Cross Church
- Sarratt C. of E. Primary School
- Sarratt Community Post Office Stores
- Sarratt Village Hall
- The Cricketers Public House, Sarratt
- The Boot Public House, Sarratt
- The Cock Public House, Sarratt

## Appendix ii

List of statutory consultation bodies written to for both 2021 & 2022

Regulation 14 consultations:

- 1) Buckinghamshire Council
- 2) Watford Borough Council
- 3) Dacorum Borough Council
- 4) Kings Langley Parish Council
- 5) Chipperfield Parish Council
- 6) Flaunden Parish Council
- 7) Chenies Parish Council
- 8) Latimer & Ley Hill Parish Council
- 9) Croxley Green Parish Council
- 10) Chorleywood Parish Council
- 11) Abbots Langley Parish Council
- 12) Coal Authority
- 13) Natural England
- 14) The Homes and Community Agency
- 15) Environment Agency
- 16) Historic England
- 17) The Office of Rail and Road
- 18) Network Rail
- 19) Highways England
- 20) National Traffic Operations Centre
- 21) Marine Management Organisation
- 22) Mobile Operators Association
- 23) British Telecom

- 24) Herts Valley Clinical Commissioning Group
- 25) National Grid
- 26) Cadent Gas
- 27) British Gas
- 28) EDS Energy
- 29) Arqiva
- 30) Hutchinson 3G UK Ltd
- 31) O2 (UK) Ltd
- 32) EE
- 33) Affinity Water
- 34) Savills UK Ltd on behalf of Thames Water Utilities Ltd
- 35) Mind Hertfordshire Network
- 36) Age UK Hertfordshire
- 37) East of England Ambulance Service
- 38) Hertfordshire Constabulary
- 39) Hertfordshire Fire and Rescue
- 40) Herts and Middlesex Wildlife Trust
- 41) Sport England
- 42) Thrive Homes
- 43) Three Rivers Chamber of Trade & Commerce
- 44) Watford and Three Rivers Trust

## Appendix iii

Full list anonymised comments received from the first Regulation 14 consultation (2021), together with resultant changes to proposed policies (attached).

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
1	1		Development Sites	New "agricultural" barns that then become houses should be looked at. (This would need legislation presumably.)	Not permitted under current legislation. Central government / LPA responsibility.	N
2	1		Development Sites	Can development proposals including extra community interaction sites be "looked upon favourably"?	Not adopted as considered may encourage development that would otherwise contravene policies.	N
3	2		Design Principles	A lot of good stuff in the Appendix on Design Guidelines which seems a bit lost for communication purposes. Can some of the key Guidelines come into the main policy if they are not things which will go out of date?	Good point on comms but guidelines are not policies and were deliberately left out of main document for brevity and hence clarity of messaging.	N
4	4	b	Housing Mix	Ensure no 'right to buy' on social rented housing.	Not in NP remit. LPA responsibility.	N
5	4	c	Housing Mix	Can availability of affordable homes be prioritised for people working in the village?	For inclusion in future Locality Protection Provision. Responsibility of Parish Council and LPA.	N
6	4	e	Housing Mix	Remove development rights from new build 3-beds to prevent exacerbating supply shortage	Not in NP remit. LPA responsibility.	N
7	4	e	Housing Mix	Size of dwellings: we don't have enough 3 bedroom homes in this parish! Most bungalows and cottages that started as 3 beds have been extended (we are as guilty of this as anyone). Can there be restrictions put on some houses so that there remains a useful amount of 3 bed housing stock? If the restriction is known about in advance, it couldn't be called unfair.	Not in NP remit. LPA responsibility.	N
8	4	f	Housing Mix	We would like to downsize to a property with a smaller garden but still a reasonable size property not a small 2 bedroom box.	In support of proposed policy.	N
9	4	f	Housing Mix	Like it! Obviously a lot of thought has gone into this. I particularly like the fact that accessible housing will be looked on positively.	In support of proposed policies.	N



## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
10	4		Housing Mix	Support smaller, affordable houses in limited numbers within the village, preferably on brownfield sites	In support of proposed policy.	N
11	4		Housing Mix	Protect Green Belt.	No specific action proposed.	N
12	4		Housing Mix	Work with Housing Association [to implement affordable housing]	Action for Parish Council.	N
13	4		Housing Mix	How do Affordable homes remain affordable once they pass into private ownership?	Dealt with via Section 106 agreement.	N
14	5	a	Environmental Assets	The inclusion of 'bat boxes' and 'swift bricks' in the construction of new homes.	Adopt	Y
15	5	a	Environmental Assets	Thank you for this brilliant document. Re: draft policy 5a) Net biodiversity gain. This is great but I think this 'gain' is often being implemented away from the building site, and not even necessarily nearby - could it be specified that it must happen within x miles of the site, ideally in its surroundings? I hope that makes sense.	Suggest adding "The biodiversity gain should be within the surroundings of the development but in any event must be within the Sarratt Neighbourhood Plan Area."	Y
16	5	a	Environmental Assets	To increase biodiversity can we positively encourage the use of swift nest boxes in new building developments (they should be sited in accordance with the information provided by <a href="http://www.swift-conservation.org">www.swift-conservation.org</a> ).	Adopt	Y

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
17	5		Environmental Assets	Hedgerows are very important. Their removal should be banned and they should be managed properly. Horses damage hedgerows tremendously.	Management of hedgerows not a planning issue. Removal of hedgerows not in NP remit - LPA responsibility.	N
18	5		Environmental Assets	Also, can we encourage the use of hedgerows rather than walls/fences. Where this cannot be avoided small holes (CD case size) should be made in walls/fences to allow the movement of hedgehogs and frogs. (CD case size would not allow foxes, badgers and larger animals.)	Need to recognise Permitted Development rights to put up a fence. Management of walls/fences not a planning issue.	N
19	6		Footpaths & Bridleways	The Sarratt neighbourhood is blessed with a large number of spacious footpaths. These are enjoyed by residents but also bring a large number of visitors to the village. That benefits the shop and the local pubs. The Plan should view these as a Community Asset with regard to the number and width of the paths. To walk side-by-side and pass other groups walking side-by-side is a key feature of the quality of the footpaths.	Covered by "equivalent or better" alternative provision in draft policy, but amended to "include width".	Y
20	6		Footpaths & Bridleways	We need to protect our footpaths from neighbouring development e.g. to prevent narrow fenced footpaths (for safety reasons and diminished enjoyment) where new gardens have been created in a former open space. I think this point is made in the Design Guidelines but worth stating it here that footpaths should remain quite open and maybe they should be bounded by hedging rather than fencing.	Need to recognise Permitted Development rights to put up a fence.	N

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
21	6		Footpaths & Bridleways	Footpaths. If these are to be diverted/built next to, please could we have a minimum width so light and air can get in and prevent a miserable muddy quagmire. Very narrow footpaths are ubiquitous and horrid, and they make people feel less safe too.	Covered by "equivalent or better" alternative provision in draft policy, but amended to "include width".	Y
22	7		Community Facilities	Please add Sarratt Almshouses, Church End to the list of Community Facilities.	Adopt	Y
23	7		Community Facilities	Add Sarratt Community Garden to the list of Community Facilities.	Adopt	Y
24	7		Community Facilities	I'm a bit confused by the distinction between Community Facilities and Businesses/Services and so by inclusion of the pubs in this section. (so long as the pubs are protected as businesses). Community Facilities sound like not-for-profit facilities.	Felt that pubs served a community role in the rural area, including use as meeting facilities for local groups, and hence would remain as drafted.	N
25	8		Car Parking	Dedicated car park required to remove visitor parking from alongside the village Green. Years ago there was a plan for a car park to be built on land off Dawes Lane behind the cottages but it was killed off by residents of Dawes Lane because they thought they would no longer be allowed to park on Dawes Lane. Parking on Church Lane should be stopped at village end because of the [unreadable] and lack of visibility.	Operational issue for Highways and Parish Council. Not a policy point.	N
26	8		Car Parking	Understood, but we should be moving away from multiple car ownership! Could the drive material be mandatorily permeable?	Suggest adding "... of permeable material" to policy.	Y

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
27	8		Car Parking	Again there is quite a lot in the Design Guidelines on how new housing should allow for parking which seems important to include in the main document. Policy 8 quite specific to objecting to development of existing car parks, can it state something about what parking provision needs to be for new businesses/facilities and housing. This policy also should link into encouraging more sustainable transport methods.	Subjective call on split between detail and top level policy. Suggest no change.	N
28	9		Local Green Spaces	A priority has to be preservation of the Green Belt. Also the general 'green' nature of Sarratt.	No specific action proposed.	N
29	10	d	Local Green Spaces	Making it easy to be green - can we include covered bicycle parking?	Adopt	Y
30	10	e	Local Green Spaces	Making it easy to be green - can we include electric charge points?	Already included in policy.	N
31	10	f	Renewable Energy & Green Infrastructure	Any new developments should have a limit on how much paved area they can include, if desired, preferably this should be gravel for drainage and water run off.	Covered by flood risk assessment. Permitted Development rights state maximum area before requiring permeable surface. Also disabled access issues. Not within NP remit.	N
32	10	f	Renewable Energy & Green Infrastructure	Rainwater collection. It is easy to incorporate an underground tank and pump to supply hoses, and waste water at the time of building. Much harder to retrofit (speaking from painful experience!). This is actively encouraged by Thames Water.	Already included in policy.	N
33	10		Renewable Energy & Green Infrastructure	Brilliant! Undercover bike park for every house?	Adopt	Y

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
34	10		Renewable Energy & Green Infratsructure	This policy seems quite weak because of the "seek to achieve" wording. Also many green technologies will date quite quickly. E.g. electric charging points for cars could be redundant if hydrogen vehicles come in. Not sure how much of energy impact is governed by national building regulations. Maybe this policy could state that new developments must meet or exceed [carbon neutrality targets]- something which is objectively measurable but can be achieved using whatever the best technology is at the time. Could there be a points system so that new developments have to incorporate at least some green infrastructure not just say 'we looked but it's uneconomic'.	Policy significantly revised as a result of other feedback. Decided not to implement a points based system due to complexity of operating.	N
35	10		Renewable Energy & Green Infratsructure	Like it! Obviously a lot of thought has gone into this. I particularly like the fact that 'Renewable energy & Green Infratsructure' has been covered.	In support of proposed policies.	N
36	10		Renewable Energy & Green Infratsructure	Insulation - can a minimum standard be insisted upon, even if it goes beyond current building regs?	Not within NP remit.	N
37	10		Renewable Energy & Green Infratsructure	Building materials - cement (and therefor concrete) has a massive carbon footprint. Are we able to stipulate a maximum weight/volume of concrete per unit?	Not within NP remit.	N
38	10		Renewable Energy & Green Infratsructure	Astroturf - this is creeping into our towns (and even villages!) It is so harmful to the soil and is yet another source of plastic that we really don't need. Could there be a restriction on using it?	Not within NP remit.	N

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
39	10		Renewable Energy & Green Infratsructure	Permeable materials for driveways and hardstanding - essential! But not currently required.	Covered by flood risk assessment. Permitted Development rights state maximum area before requiring permeable surface. Not within NP remit.	N
40	10		Renewable Energy & Green Infratsructure	Energy - I may be wrong, but I think it is currently not permitted to put solar panels on roofs in conservation areas, even if they cannot be seen by anyone except the homeowner. Surely this is beyond outdated!	Currently not permitted in Conservation Areas. Policy revised to allow ambiguity to encourage use where not changing historic / landscape character (eg not visible from roads) inclduing in C.A.s.	Y
41				I think this is a splendid plan and it is good to have the protective levels. It is also good to have involved the local community and to be taking comments seriously.	In support of proposed policies.	N
42				Objective 1- Economic- focusses on current key business and services which we clearly need to maintain. What about new businesses/services which could enhance village life and also provide valuable employment options (reducing commuting)? We already have some businesses which are not listed as Key e.g. the remaining nurseries and the units in Church Lane. These are also important, while these specific businesses may close down can the plan encourage that change of use to residential is not the only option. Any new business sites should have to be suitable for our village setting - not sure how you specify but not heavy industry/noise or emissions polluting etc. Can the Plan comment on how residential/social/economic mix could develop and how SPC would view other types of business?	Not addressed. SPC remit.	N

## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback

Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
43				Thank you all for the huge amount of work that has gone into producing this plan. I like your idea of producing these very tight criteria with which new developments should comply - well thought out as far as I can anticipate. I can't think of anything that I want to add to it, and as I mentioned on Saturday, my only concern is that protests in other TRDC areas are vocal and involve large numbers of people and TRDC decide to place a large development in the Sarratt parish where there are fewer votes to lose! We'll see. Thank you again for your work on this.	In support of proposed policies.	N
44				I think TRANSPORT is a most important part of our neighbourhood plan. To Watford and To Hemel Hempstead buses will need to be improved. Children of the Parish are catered for to St. Clement Danes, but there will be no room for cars to be parked at stations (far or less in Sarratt!) for travelling by bus and trains to offices for many more commuters.	Transport services are not part of the NP remit (apart from encouraging sustainable modes of transport in any development). HCC responsibility.	N
45				Greater enlargement of Sarratt School to cope with influx of children.	Education not part of NP remit. HCC responsibility.	N
46				GP in Sarratt (attached to New Road surgery will need many more GP's and facilities.	Healthcare services not part of NP remit.	N
47				Statutory response received from the Marine Management Organisation - no specific comments on the draft NP.	No change.	N
48				Statutory response received from the National Grid - no specific comments on the draft NP.	No change.	N
49				Statutory response received from Sport England - no specific comments on the draft NP.	No change.	N


## Sarratt Neighbourhood Plan: Reg 14 Public Consultation - feedback


Item no.	Policy no.	Policy no. sub section	Policy Name	Comment received	Proposed change	Implement change?
50				Statutory response received from Natural England - no specific comments on the draft NP.	No change.	N
51				Statutory response received from Herts Wildlife Trust, including additional suggested wording and policies.	Significant use of suggested wording in redrafted biodiversity policy.	Y
52				Statutory response received from Hertfordshire Constabulary - no specific comments on the draft NP.	No change.	N
53				Statutory response received from Historic England - stated not necessary to be involved in detailed development of NP.	No change.	N
54				Statutory response received from National Highways - no specific comments on the draft NP.	No change.	N
55				I do contest the amount of new housing that our dear government thinks we need! The birthrate is falling year on year, and in my mind, that can only be a good thing. However, should targets be imposed upon us, I think a robust neighbourhood plan is a great thing, and I'm grateful to you all for working on it.	In support of proposed policies.	N
56				Thank you for all of your work on this - it must be a mammoth undertaking.	In support of proposed policies.	N



## Appendix iv

Full list of comments received from the first Regulation 16 consultation (2023), together with responses and resultant changes to proposed policies (attached).


Ref.	Organisation/ Respondent	Transcript of Response (personal details removed)	Attached Documents	Neighbourhood Plan response
2	The Environment Agency	<p>Thank you for consulting us on the Neighbourhood Plan consultation for [Sarratt Neighbourhood Development Plan].</p> <p>We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. We attach our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.</p> <p>We recognise that Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This advice note sets out the key environmental issues, within our remit, which should be considered. It also references sources of data you can use to check environmental features.</p> <p>We hope this is helpful as you prepare evidence and the Neighbourhood Plan itself.</p> <p>If you have any feedback please let us know.</p> <p>Kind regards</p> <p><b>Planning Advisor</b> (Hertfordshire), Hertfordshire and North London Sustainable Places  <b>Environment Agency</b>   Alchemy, Bessemer Road,  Welwyn Garden City, Hertfordshire, AL7 1HE</p> <p><a href="mailto:HNLsustainablePlaces@environment-agency.gov.uk">HNLsustainablePlaces@environment-agency.gov.uk</a></p>	 HNL NP advice note.pdf	Noted.
4	Historic England	Our ref: PL00786442		Noted.


		<p>Dear Neighbourhood Planning Team</p> <p><b>Ref: Sarratt Regulation 16 Neighbourhood Plan Consultation</b></p> <p>Thank you for inviting Historic England to comment on the above consultation. We welcome the production of this neighbourhood plan in principle but, owing to staff vacancies, we do not currently have capacity to provide detailed comments.</p> <p>We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.</p> <p>Our detailed advice on successfully incorporating historic environment considerations into neighbourhood plan, alongside some useful case studies, can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p> <p>Please do contact me, either via email or the number above, if you have any specific queries arising following this stage, and we will endeavour to assist at that time.</p> <p>Kind regards</p>		
5	Natural England	<p>Please find Natural England's response in relation to the above mentioned consultation attached.</p>	 <p>439752 NE Response.pdf</p>	Noted.

		<p>Kind regards,</p> <p>Adviser Operations Delivery, Consultations Team Natural England County Hall Spetchley Road Worcester WR5 2NP</p> <p>Tel 0300 0603900</p> <p>mail to: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a></p>		
7	<b>Sport England</b>	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework</b> (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p>		<p>The only existing sports and playground facility in the Neighbourhood Plan Area is the KGV Playing Fields (and children's play area) which has been included in the list of Community Facilities.</p> <p>Policy 9 (Community Facilities) specifically states a presumption against the loss of any listed Community Facility.</p> <p>As no new development sites are proposed as part of the Neighbourhood Plan, no specific strategy or new sports facilities are included, but are covered by wider requirements in the Design Codes (Appendix III) for people to lead healthy lifestyles and create healthy communities in any future new development.</p>

		<p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p>		
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		<p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.  <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p>		
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		<p>PPG Health and wellbeing section:  <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance:  <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p> <p>Yours sincerely</p> <p>Planning Administration Team  <a href="mailto:Planning.central@sportengland.org">Planning.central@sportengland.org</a></p>		
17	HCC Growth and Infrastructure Unit	<p>Please find attached HCC's response to the Reg 16 Sarratt Parish Neighbourhood Plan consultation.</p> <p>It would be great if you could acknowledge the receipt of this email.</p> <p>Best Regards,</p>	 Sarratt NP HCC response (Reg16).pdf	<p>The overall supportive comments from HCC on the draft Neighbourhood Plan are noted.</p> <p>Policy 1 is primarily aimed at <i>where</i> any potential development should take place and not <i>how</i> that should be implemented. The policy does reference NPPF principles for sustainable development, and given the context for the policy it is felt that this is sufficient otherwise there is the risk that the key point of the policy is lost if there are multiple other references to all matters relating to sustainable development such as transport.</p> <p>Policy 4.2 – The supportive statements regarding this policy are noted.</p>

				<p>Policy 8 – The proposal to expand the policy from “footpaths and bridleways” to “Public Rights of Way” (i.e. includes byways) and to replace “sustainable travel” with “active travel” in this context is well made and accepted, including the change of policy name. The proposed changed of wording for the context and policy in paras 2.7 &amp; 2.9 respectively have therefore been adopted (with the exception of reference to HCC for consistency with all other instances where other authorities are not specifically mentioned).</p> <p>Policy 10 bullet c – noted.</p> <p>Policy 12 – It is felt that bullets 5 and 6 adequately address the (valid) points made on sustainable transport and EV charging points respectively.</p> <p>The general comments from Library Services, Lead Local Flood Authority and Transport are noted.</p>
18	<b>HCC Minerals and Waste</b>	<p>Hello,</p> <p>Attached are the Hertfordshire County Council Minerals and Waste Team’s comments on the Regulation 16 Sarratt Neighbourhood Plan Consultation.</p> <p>Kind regards</p>	 Sarratt Reg16.pdf	Noted.
11	<b>Resident(s)</b>	Fully supportive.		
12	<b>Resident(s)</b>	These are excellent and get my approval.		Noted.
13	<b>Resident(s)</b>	I agreed with them in principle and in detail. Low cost/affordable housing is the only category where there is a significant shortage.		Noted.



14	Resident(s)	I approve of the plan and its contents		Noted.
15	Resident(s)	<p>The comments I made in relation to crime prevention and security for the Three Rivers local plan are also relevant to the Sarratt local plan. Prevention First - Security and crime prevention , building developments to the Police security standard Secured by Design. Designing out crime and building developments to the police preferred minimum security standard Secured by Design (SBD) creates secure, safer and sustainable environments providing a better quality of life for the residents living in the area. Commercial and industrial sites, footpaths, play areas, retail units, landscaping ,car parking areas and lighting can all be designed to reduce the fear of crime and have a significant impact on anti-social behaviour . There are also substantial environmental benefits to designing out crime, research indicates that the carbon cost of crime in the UK is in the region of 6,000,000 tonnes of CO2. Independent academic research suggests that housing developments built to the Secured by Design standard have 25% less criminal damage, 25% less vehicle crime and 87% less burglary. Incorporating crime prevention and security into the local plan would help the police to continue to work with the planning departments in the future and provide safer environments for living, working and leisure</p>		<p>Whilst crime prevention is clearly an important issue, it did not feature as a priority in either of the two previous Parish Plan surveys or the consultations to derive the Objectives for the Neighbourhood Plan. This may be as a result of the fact that the NP Area is a low crime area.</p> <p>As such and particularly since no new developments are proposed as part of the Neighbourhood Plan, no specific crime prevention policies have been included.</p>
16	Boyer Planning	<p>I am writing on behalf of our client, Burlington Property, in respect of the emerging Sarratt Neighbourhood Plan which is currently the subject of consultation. Context On behalf of our clients, we are progressing with proposals on two sites in Sarratt that are subject to live planning applications, currently at appeal (refs: 22/0601/OUT (land r/o 17-49 Church Lane) and 22/0602/OUT (land adjacent 97 Church Lane)). The two proposals will deliver a number of benefits including the delivery of vitally important new market, affordable and self-build housing, new Doctor's Surgery along with new areas of publicly accessible open space. I enclose copies of the site location plans for information. Comments The legal and procedural tests that a Neighbourhood Plan (NP) must comply with are set out within the Localism Act 2011, the</p>		<p>It is worth noting that the Sarratt Neighbourhood Plan has adopted a principles-based approach and is therefore site agnostic (i.e. it has not proposed, or equally dismissed, any specific sites for development, but instead has created the principles by which any site, existing or future can be assessed against the policies for appropriateness).</p> <p>As such, this response will not comment on any specific current live planning applications nor the sites concerned, and</p>

		<p>Neighbourhood Planning (General) Regulations 2012, the National Planning Policy Framework (2021) and the National Planning Policy Guidance (2014) (and subsequent updates). It is against these tests that the draft NP must be considered. We do not seek to repeat this guidance but of particular importance is the relevant basic conditions applicable to the NP which are:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). (d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. (e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). (f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. (g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). We acknowledge that a significant amount of work has been undertaken to inform the emerging Neighbourhood Plan, particularly the Housing Needs Assessment prepared by AECOM. We support the conclusions of this work which has identified a significant need for new homes in Sarratt and has informed the wording of Policies 4 and 5, albeit we consider that Policy 5.2 should reflect the full range of affordable house types (as set out in the NPPF e.g. including affordable rent tenures). We consider that proposed new development is vital in meeting these policy aims however in light of Policy 1 and the context behind this policy (as set out on page 24) it is unclear how the aims of Policies 4 and 5 can be met. On this basis, there is a clear conflict between Policies of the NP and so in order to deliver new development to meet the needs of the village we consider that Policy 1 should be more flexibly worded in order to contribute to the achievement of sustainable development (condition d), namely the removal of previously developed land wording from the first paragraph of the policy so that the overriding objective is to deliver sustainable development. Policy 3 relates to Historic Character which seeks to conserve and enhance the setting of the Green</p>	<p>will only address comments relating to the proposed policies.</p> <p>With respect to policy 5.2, we believe that the proposed affordable housing mix best represents local need and affordability.</p> <p>There is no conflict between Policy 1 (and the strong local preference to protect the character of the core village and prevent village extensions) and the aims of Policies 4 &amp; 5 (housing mix). Specifically, <i>where</i> any development takes place is different to <i>what</i> type of development is made. Consequently, no change to the wording of Policy 1 is deemed necessary.</p> <p>Policy 3 (Historic Character) describes how the range of views across valleys and fields that are intrinsic to the character of the Parish and to the <u>setting</u> of its two conservation areas. This last point is key.</p> <p>Any one of the twelve <i>Important Views</i> included in the Neighbourhood Plan may be inconvenient for a developer at some point now or in the future. Their inclusion is specifically to help conserve and enhance the setting of the Conservation Areas as a <i>whole</i> rather than for a particular site, as shown in the map (p30), which is consistent with national and strategic policies. As such, removal of any individual view at the request of a developer with vested interests is not appropriate.</p> <p>The supportive comments re-Policy 9 are noted. However, the statement that the improvement of quality of community</p>
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		<p>Conservation Area and Church End Conservation Area which we acknowledge is consistent with national and strategic policies. The Policy, however, continues by stating that development that adversely affects the important views in and out of the Conservation Areas will not be supported and identifies 12 such views. View 2 extends over land to the rear of 17-49 Church Lane. We strongly object to this part of the policy as it is not stated how this view (or indeed any other identified view) is important to conserving or enhancing the existing conservation areas. In reaching this view, the comments of the District Council's Conservation Officer to the application on this site (22/0601/OUT) are important. In this case the officer states: "...the application site is removed from the Conservation Area by the existing residential along Church Lane. The site is considered to make a limited contribution to the significance of the Conservation Area as a rural settlement as it is removed from the immediate setting by existing development. Due to the lack of intervisibility between the Conservation Area and the application site, the Conservation Area would still be appreciated as a linear and rural settlement. There may be some visual impact arising from the development of 78 homes realised through diurnal and seasonal changes, however, it is likely that these concerns could be addressed through considered layout and a robust landscaping scheme...." In light of these conclusions and any lack of justification to support the NP's stated viewpoints we consider that the inclusion of View 2 would not be in general conformity of strategic policies and as such would fail condition e. As such, we consider that this viewpoint should be omitted from the NP. We support the aims and objectives of Policy 9 which seeks to improve the quality of community facilities and would highlight that given the generally limited sources of external funding the enhancement of such facilities, which assists in creating a sustainable community in Sarratt, can only be achieved as part of new development which could also comply with other policy objectives of the NP.</p>		<p>facilities "can only be achieved as part of new development" is plainly false as evidenced by the successful CIL grant of £170k made by TRDC to Sarratt Parish Council for the refurbishment of the KGV Playing Fields play equipment in July 2023.</p>
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# Hertfordshire and North London Neighbourhood Plan Advice Note

Updated: June 2021

**Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered.**

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water, and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>), and the Thames River Basin Management Plan ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289937/GETH0910BSWA-e-e.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/GETH0910BSWA-e-e.pdf)) as appropriate.

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floodline  
03459 88 11 88

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

## Infrastructure Delivery

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

## Flood risk

### **Development must be safe and should not increase the risk of flooding.**

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG):

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks, and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at [HNLequiries@environment-agency.gov.uk](mailto:HNLequiries@environment-agency.gov.uk) for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

## Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

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## Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

## Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at [hnlquiries@environment-agency.gov.uk](mailto:hnlquiries@environment-agency.gov.uk).

## Ecology and Water Management

### Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering **biodiversity net gain**. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/>. We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from [hnl.enquiries@environment-agency.gov.uk](mailto:hnl.enquiries@environment-agency.gov.uk) on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<https://www.gov.uk/search?q=River+Basin+Management+Plans>).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

## Groundwater Quality

**Development must not cause pollution to the water environment.**

### Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

## Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

*Guiding principles for the Land Contamination*

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

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### *Approach to Groundwater Protection:*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf)

## **Water supply and foul drainage**

When allocating sites in your Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our '[Water Stressed Areas – final classification](#)' 2013 explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

## **Surface water drainage**

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

## **Please note**

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.

If you have any questions please contact the Hertfordshire and North London Sustainable Places team: [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk)

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Date: 07 August 2023  
Our ref: 439752  
Your ref: Sarratt Neighbourhood Plan



Mr Marko Kalik  
Three Rivers District Council

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**  
[trldf@threerivers.gov.uk](mailto:trldf@threerivers.gov.uk)

Return to Consultation Statement  
Appendix iv Reference 5

T 0300 060 3900

Dear Mr Kalik

### **Sarratt Neighbourhood Development Plan - Regulation 14 Consultation**

Thank you for your consultation on the above dated 27 June 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

### **Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely  
Sally Wintle  
Consultations Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://theassociationoflocalenvironmentalrecordscentres.org/) .

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://landis.org.uk/)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).

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<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.



**REPRESENTATIONS OF HERTFORDSHIRE COUNTY COUNCIL (HCC)  
GROWTH & INFRASTRUCTURE UNIT**

**ON BEHALF OF HCC (excluding HCC Property)**

**IN RELATION TO THE**

**SARRATT PARISH NEIGHBOURHOOD PLAN REGULATION 16  
CONSULTATION VERSION**

**AUGUST 2023**

## **1.0 Introduction**

- 1.1 This representation is made by Hertfordshire County Council's (HCC) Growth & Infrastructure Unit, in relation to the Sarratt Parish Neighbourhood Plan (submission version) regulation 16 consultation. The comments within this representation reflect the interests of the following services that are provided by HCC, along with other relevant areas within the Environment & Infrastructure Department (excluding HCC Property):
- Adult Care Services
  - Libraries Services
  - Lead Local Flood Authority (HCC as LLFA)
  - Transport (HCC as Highways Authority)
  - Rights of Way
- 1.2 The approach adopted within this representation follows the format of the consultation document itself. It should be noted that comments have only been made on the parts of the plan that are considered to be of relevance to HCC. Comments relating to a specific HCC service area and department have been stated. Sections 3-5 of this representation contain general comments from Highways, Libraries Services and Local Lead Flooding Authority (LLFA) that are not policy specific.
- 1.3 Additional text that has been suggested as modifications have been underlined and text suggested for deletion ~~struck through~~.
- 1.4 The comments made within this representation also reflect HCC's commitment to moving towards more sustainable modes of transport and movement, as set out in the county council's Local Transport Plan (LTP4, adopted in May 2018) with the hierarchy of preference of provision being ordered as follows: walking, cycling, public transport, car use. The role that the enhancement of the Public Rights of Way network (whether footpaths or cycleways) can play to support aspirations to achieve modal share is also important to HCC.

## **2.0 HCC Comments on the Plan**

### **SECTION 1: Development in Villages and Hamlets**

#### **Policy 1**

- 2.1 Transport. This policy should have reference to ensuring LTP4 access to sustainable transport. The policy should include the following:

<p><u>Consideration should be given to balancing the needs of all users but in accordance with the hierarchy providing improved opportunities for walking and cycling and other more sustainable modes ahead of motor vehicles when providing new streets in areas of growth and development to facilitate more sustainable journeys to be made to local areas and facilities.</u></p>
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- 2.2 The text above is suggested based on Policy 1: Transport User Hierarchy within HCC's Local Transport Plan 4.

*LTP4, Policy 1*

*“To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:*

- Opportunities to reduce travel demand and the need to travel*
- Vulnerable road user needs (such as pedestrians and cyclists)*
- Passenger transport user needs*
- Powered two wheeler (mopeds and motorbikes) user needs*
- Other motor vehicle user needs”*

## **SECTION 4: Housing Mix**

### **Policy 4.2**

- 2.3 Adult Care Services. As stated in the Parish overview, the Parish has a predominantly older population. Section 4 Housing Mix refers to the need for accessible accommodation to enable residents to downsize and free up family sized accommodation for younger residents.
- 2.4 The objective of Policy 4.2 is welcomed. Development proposals where the provision of bungalows, accessible homes and all types of self-build properties as part of the housing allocation mix above will be looked upon favourably, provided they are 3 bedrooms or fewer, unless a specific identifiable local need can be demonstrated. HCC note that this is in accordance with the findings in the Housing Needs Assessment (AECOM, Jan 2020).
- 2.5 We note that it is also mentioned in the supporting text in Section 5 that “A supply of accessible homes for the elderly to be able to downsize and remain in Sarratt was also an important conclusion, which additionally has the benefit of freeing up larger properties and hence a desirable trickle-down effect.”
- 2.6 The Iceni report (a technical report produced in 2022 in relation to Older persons and adult disability care housing need model) concludes that an increase in older persons accommodation for Three Rivers District is required with a focus on Extra care housing and nursing care accommodation but there would be limited scope to provide within the Parish due to its location within the Green Belt. HCC therefore welcomes policy that may potentially offer alternative housing options for older people.

## **SECTION 8: Footpaths and Bridleways**

### **Policy 8**

- 2.7 Rights of Way. It is recommended that all forms of rights of way should be included in the policy. As such we recommend renaming this Chapter and adding words to the Context as follows:

## Section 8: Public Rights of Way:

Context: With over 27 miles of Public Footpaths, Bridleways and Restricted Byways in the parish. Their use for both sustainable transport active travel for short trips within the village and for recreation for residents and visitors underlines their importance. This was emphasised during the consultation process, which also identified width as of particular concern for a wide variety of users, including the elderly and disabled.

- 2.8 The reasons for the suggested modification are due to, 1) there are 2 Restricted Byways in the Parish which should be recognised in the text; 2) Sustainable Transport tends to include Public Mass Transport (Buses), however, only Active Travel modes (e.g. walking, cycling, wheeling) are suitable for Public Rights of Way.
- 2.9 Further to the suggested changes above, it is also recommended that the Policy wording be altered as follows:

### Policy 8: Public Rights of Way

There is a presumption against the loss of a ~~public footpath or bridleway~~ Public Right of Way. Where a proposal requires an existing ~~footpath or bridleway~~ Public Right of Way to be re-routed, the applicants will be expected to provide evidence that shows footpaths/bridleways/byways will be re-provided elsewhere and will be of the same or enhanced status/quality (including width) and in an equally suitable location to service its function. Rural, unmade footpaths should not be replaced by tarmac ones. Any modifications to the network will require involvement of HCC as the Highways Authority (Public Rights of Way).

- 2.10 The requirements set out in Policy 8 for footpaths and bridleways, is supported. However, it seems to be more inclusive with the title change, to Public Rights of Way, and reference the same in replacement of “footpaths and bridleways”. Furthermore, please note that Hertfordshire County Council is the Highways Authority (including Public Rights of Way) and any modifications to the network will require processing by the Highway Authority.

## **SECTION 10: Car Parking**

### **Policy 10, bullet point c.**

- 2.11 Transport. The inclusion of Parking standards as set out by TRDC should be followed in all new developments. Any proposed development site should be developed to facilitate walking and cycling for short utility trips, providing adequate footways and cycle parking and provisions. Please note that rather than looking to facilitate more parking, greater emphasis should be placed on creating improved provision for shorter journeys (to school, Village Hall, The Green etc) by more active modes such as walking or wheeling.



## **SECTION 12: Renewable Energy & Green Infrastructure**

### **Policy 12**

- 2.12 Transport. It is recommended that greater emphasis on sustainable transport modes should be made to be in line with previous policies. Any proposed development site should be developed to facilitate walking and cycling for short utility trips, providing adequate footways and cycle parking and provisions to ensure the development is sustainable.
- 2.13 Electric Vehicle charging should be in line with HCC EV strategy to include that new developments should include electric vehicle charging as per HCC's Electric Vehicle Strategy.

### **3.0 General comments from Libraries Services**

- 3.1 There are no changes in Libraries' position and previous response made in Reg14 still apply. In Section 9 of the Neighbourhood Plan, it states that "there is an absence of community library facilities" in Sarratt. Please note that this will continue to be the case as HCC will not be opening new community library facilities in the village of Sarratt. Library services continue to be available for Sarratt residents through Chorleywood Community Library, Kings Langley Community Library and Rickmansworth Library.

### **4.0 General comments from Lead Local Flood Authority (LLFA)**

- 4.1 It is to note that according to the Strategic Environment Assessment (SEA, an assessment prepared by Place Services (2022)) there are no reported flood incidents in the Sarratt Neighbourhood Area, however there are still various sources of flood risk in the area. These include surface water, rivers and ordinary watercourses and groundwater. LLFA is pleased to see that the SEA refers to areas within Flood Zones 2 and 3. The SEA notes that the Plan contains no policies to address flood risk.
- 4.2 LLFA is pleased to see that section 3 Design Guidelines refers to drainage infrastructure, and paragraph 3.2.2 Roads refers to sustainable drainage opportunities.
- 4.3 LLFA would highly recommend that the Plan is updated to include greater reference and requirement for the use of Sustainable Drainage Systems (SuDS) in developments in the area. SuDS should be used in all developments to mitigate the increase in permeable area by mimicking natural drainage processes.
- 4.4 SuDS features include structures such as attenuation basins/pond, blue-green roofs, swales, permeable paving, rain gardens and so on, and can be used to capture, attenuate and slowly release surface water in order to reduce pressure on local drainage infrastructure.

- 4.5 Above-ground SuDS can and should be delivered on all developments to capture, attenuate and regulate the flow of water, averting the potential impact of increased impermeable surfacing. In doing so, developments should not increase flood risk and may even provide flood risk betterment. Furthermore, the use of SuDS can improve the water quality of runoff that may eventually be discharged to natural assets such as rivers or ordinary watercourses. This is particularly important when draining surfaces that may contain contaminants, such as roads or car parks.
- 4.6 A source control approach whereby SuDS features and surface water attenuation are distributed around the site should be prioritised, instead of a traditional “pipe to basin” solution where the vast majority of surface water storage is provided in a single large structure.
- 4.7 SuDS can also be retrofit on a local level. Features such as permeable paving, rain gardens and tree pits can be implemented locally to provide the benefits described above at relatively low cost. If the Sarratt Neighbourhood Plan Working Group wishes to seek advice regarding the use of retrofit SuDS, the LLFA would be happy to advise.
- 4.8 If consulted by the Local Planning Authority Three Rivers District Council on future major planning applications in the Sarratt Neighbourhood Area, the LLFA will require the use of above-ground SuDS unless they can be demonstrated unfeasible through technical justification and ensure surface water is managed effectively by any new development.
- 4.9 It is worth noting that the Government seeks to implement Schedule 3 of the Flood and Water Management Act 2010 in 2024. Schedule 3 will require Hertfordshire County Council LLFA to create a SuDS Approval Body (SAB). The role of the SAB is to ensure all new developments make appropriate use of SuDS, and the SAB will then adopt any SuDS serving more than 1 property.
- 4.10 Once the SAB is implemented, all developments of more than 1 property or 100m<sup>2</sup> will need to apply to the SAB for consent. Construction cannot begin until SAB consent is granted, regardless of any planning permission. This is therefore different to the existing situation where the LLFA is statutory consultee in the planning process but has no adoption or enforcement responsibilities. Please note that the Government is yet to specifically confirm its expectations of the SAB, however the above is likely to apply based on the policy within FWMA 2010.
- 4.11 All developments should comply with local and national design SuDS guidance such as HCC’s LFRMS2, the national non-statutory technical standards and so on. Further information is available on HCC website - <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/flooding-in-hertfordshire.aspx>

## **5.0 General comments from Transport**

- 5.1 The primary interest of the Highway Authority in Neighbourhood Plans is in relation to its approach to highway and transport matters. HCC aims to provide a safe, efficient, and resilient transport system that serves the needs of businesses and residents across Hertfordshire and to minimise impact on the environment. The comments made within this representation reflect HCC's commitment to moving towards more sustainable modes of transport and movement as set out in the Hertfordshire Local Transport Plan.
- 5.2 Hertfordshire County Council's adopted Local Transport Plan 4 (LTP4) and its supporting documents set out the long-term transport strategy for the County to accommodate the levels of housing and employment growth being identified by the District Councils in their emerging Local Plans.
- 5.3 The LTP4 provides a framework to guide all our future transport planning and investment.
- 5.4 The LTP provides a policy foundation for a balanced approach to transport and consistently promoting and enabling sustainable transport and sustainable travel behaviour in order to support better economic, social, and environmental outcomes for the county in a context of growth. The LTP accelerates the transition from previous transport plans and strategies that were largely focused on the car to a more balanced approach which caters for all forms of transport and seeks to encourage a switch from the private car to sustainable transport (e.g. walking, cycling and passenger transport) wherever possible. The founding policy of the LTP4 establishes a Transport User Hierarchy, which sets out that in the development and design of any plan, project or scheme consideration should be given in the following order to:
- Opportunities to reduce the need to travel
  - Vulnerable road user needs (such as pedestrians and cyclists)
  - Passenger transport user needs
  - Powered two wheeler (mopeds and motorbikes) user needs
  - Other motor vehicle user needs
- 5.5 Local Plans and Neighbourhood Plans must align with and support the delivery of LTP policies and objectives.
- 5.6 The Highway Authority is a statutory consultee to planning applications submitted to Three Rivers District Council. These are assessed and considered in the context of the current legislation. Both national and local policies are considered in relation to sustainable transport. New development proposals are expected to support delivery of the LTP objectives and align with its policies, including those contained within any of its supporting documents. New developments are expected to also adhere to guidance documents such as the county council's Highway Design Standards (as outlined in Roads in Hertfordshire or any successor document to this), and any national design guidance this recommends such as Manual for Streets. Developers need to ensure that their development sites support their share of the required infrastructure and service improvements and are accessible by all transport modes. Any new roads and streets within new development and any associated

off-site highway infrastructure will have to undergo appropriate scrutiny, including that it promotes highway safety.

- 5.7 The County Council have developed a number of Growth and Transport Plans (GTP) which will sit as supporting documents to LTP4. The South Western Growth and Transport Plan (SWGTP) was adopted in January 2021. The GTP is a strategic spatial transport plan consisting of the southern portion of the M1 corridor and includes the towns of Watford, Hemel Hempstead and Rickmansworth.

**Colin Haigh, Director of Growth  
and Place**



**Planning Policy and Conservation  
Three Rivers District Council  
Three Rivers House, Northway  
Rickmansworth, WD3 1RL**

**Spatial Planning Unit  
Minerals and Waste Team  
Hertfordshire County Council  
CHN216  
County Hall  
Pegs Lane  
Hertford, Herts SG13 8DF**

**Tel:** 01992 555347  
**Email:** [mineralsandwaste@hertfordshire.gov.uk](mailto:mineralsandwaste@hertfordshire.gov.uk)  
**My ref:** SPU/DCMW  
**Date:** 05 July 2023

Dear Sir or Madam,

I am writing to provide comments on behalf of Hertfordshire County Council, as the Minerals and Waste Planning Authority to the Regulation 16 Sarratt Neighbourhood Plan Consultation.

The Minerals and Waste Planning Authority would like to advise that the development Plan for the area includes the adopted Minerals Local Plan 2002-2016 and the adopted Waste Planning Documents (Waste Core Strategy & Development Management Policies Development Plan Document 2011-2026 and the Waste Site Allocations Development Plan Document 2011-2026) in addition to Three Rivers District Council's adopted Local Plan. Mention of this should be included within the Plan.

### Minerals

In terms of minerals, the Minerals Planning Authority would like the Parish council to note that the Neighbourhood Plan Area falls mostly within the 'Sand and Gravel Belt' (SAGB) as identified in Hertfordshire County Council's Minerals Local Plan 2002 – 2016. The Sand and Gravel Belt, is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. The SAGB forms part of our 'Minerals Consultation Areas' (MCAs), as defined within our Minerals Consultation Area SPD.

An MCA is an area identified by a County Council where planning applications for non-minerals development submitted to the District/Borough Councils may not be determined until the County Council has been given the opportunity to comment on whether the proposal would unacceptably sterilise mineral resources. In practice, the consultation requirement only applies to major applications, with specific consultation requirements set out in our MCA SPD.

Therefore, the Minerals Planning Authority will provide comment as appropriate on applications submitted to the District Council which fall within these areas of potential sand and gravel deposits.

Waste

There are no safeguarded waste management facilities within the Neighbourhood Area, nor are there any Allocated Sites for waste management development or Employment Land Areas of Search. Therefore, the Waste Planning Authority has no concerns with regards to waste.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Clark', written in a cursive style.



Daniel Clark  
Minerals and Waste Planning Officer

## Appendix v

Full list of comments received from the second Regulation 16 consultation (2024), together with responses and resultant changes to proposed policies (attached).

All responses to Reg 16 Consultation on Sarratt Neighbourhood Plan (23 <sup>rd</sup> July – 11 September, 2024)				
	Representor	Comments	Details	Neighbourhood Plan response
1.	-	<p>Policy 6.3: Species and Habitats vii. "Integrated bird (e.g. swift) and bat boxes will be expected in all buildings bordering public green space and beneficial habitat"</p> <p>This provision is most welcome. The wording which specifies Swifts is important as integrated Swift boxes conform to the British Standard for integrated nest boxes, BS42021:2022, making them universal for a number of species. House Sparrows for example prefer to nest in Swift bricks, whereas the reverse does not apply, Swifts will not nest in Sparrow boxes</p> <p>Please ensure that the specific reference to Swifts is retained in the final NP.</p> <p>In addition, please consider two minor amendments: Swifts and other urban nesting birds do not require nest boxes to be adjacent to green space. Please consider removing the words "bordering public green space and suitable habitat". Secondly, replace "bird (eg Swift)" with just "Swift". For the reasons set out above, no other types of integrated next box are required</p> <p>An alternative wording could be adopted as is in the draft Batchworth NP: "Swift and bat boxes shall be integrated into all new buildings".</p>		<p>The supportive comments with respect to Policy 6.3(vii) in the draft Neighbourhood Plan are noted.</p> <p>It is the intention to retain specific reference to Swifts in the final NP.</p> <p>Whilst recognising the needs of Swifts specifically, the intention was not to be restrictive to one species and also considering the rural nature of the parish, the existing wording is considered adequate.</p>



2.	RPS Group	Please attached letter	 3348_001.pdf	Policy 1 – Noted. Policy 4 – Noted. Policy 5 – Noted. Conclusion – The NP is compliant with national planning policies, including the NPPF (2023), recognising its context as a rural parish in Green Belt and the need to protect the historic character of its villages and hamlets.
3.	HCC Growth and Infrastructure	Please see attached letter	 Sarratt NP HCC response (Reg16 re-c	Policy 1 is primarily aimed at <i>where</i> any potential development should take place and not <i>how</i> that should be implemented. Given the context for the policy it is felt that there is a risk that the key point of the policy is lost if there are references to other matters relating to sustainable development such as transport.  Policy 2 – Noted.  Section 9 (context) – The neighbourhood plan is concerned with the specific provision of services and facilities within Sarratt and hence whilst library services may be provided outside of the

				<p>neighbourhood plan area, the context is that no such facilities exist within Sarratt.</p> <p>Policy 12 – It is felt that bullet 6 is supportive of HCC's sustainable transport and EV strategy.</p> <p>The general comments from Lead Local Flood Authority and Transport are noted.</p>
4.	Natural England	<p>Thank you for your consultation on the above dated 22 August 2024</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b></p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on</p>		Noted.

		<p>protected species and development is included in Natural England's Standing Advice on protected species .</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p> <p>For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>		
5.	Sport England	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework</b> (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing</p>		<p>The only existing sports and playground facility in the Neighbourhood Plan Area is the KGV Playing Fields (and children's play area) which has been included in the list of Community Facilities.</p>

		<p>enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically</p>		<p>Policy 9 (Community Facilities) specifically states a presumption against the loss of any listed Community Facility.</p> <p>As no new development sites are proposed as part of the Neighbourhood Plan, no specific strategy or new sports facilities are included, but are covered by wider requirements in the Design Codes (Appendix III) for people to lead healthy lifestyles and create healthy communities in any future new development.</p>
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		<p>relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing</p>		
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		<p>section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section:  <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance:  <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p>		
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**Our ref: MNP-00124.C8614**

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T +44 121 622 8520

Date: 11 September 2024

Planning Policy and Conservation  
Three Rivers District Council  
Three Rivers House  
Northway  
Rickmansworth  
Hertfordshire  
WD3 1RL

Dear Sir / Madam,

**Re: Sarratt Neighbourhood Plan 2024 (Regulation 16) Consultation**

## Introduction

RPS Consulting Services Ltd ("RPS") is instructed by Richborough to represent their interests in relation to the Sarratt Neighbourhood Plan 2020-2036 ("SNP") and to formally respond to the Regulation 16 Pre-Submission Consultation, proposed by the Sarratt Parish Council.

It is understood that once the Regulation 16 Consultation concludes, the SNP will be amended and formally submitted to Three Rivers District Council ("TRDC"), the plan will be finalised and sent to TRDC for approval prior to a conducting a public referendum before it is formally adopted, before Three Rivers' New Local Plan, expected mid-2025.

Richborough's representations addresses matters of policy set out in the consultation Plan, including design, housing mix and the spatial distribution of development. It is noted that from the outset, Richborough is supportive of the aims of the SNP and will look to engage proactively with the Parish to ensure that a compliant Plan can be delivered. Richborough does have minor concerns with various policies and other related aspects of the published evidence base.

Richborough remain committed to working with the Parish Council, this will help both the Parish and District Councils to deliver much needed housing as a means to tackle the current housing shortfall in Three Rivers District, but also deliver significant benefits to the local area. As set out in Planning Practice Guidance<sup>1</sup> ("PPG"), strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan. It is important to

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<sup>1</sup> Paragraph: 009 Reference ID: 41-009-20190509



minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies and the associated evidence base underpinning this.

## The Sarratt Neighbourhood Plan

The PPG summarises the Basic Conditions that the SNP must meet, as defined in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. They are as follows:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations;
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

The first clause of the Basic Conditions relates to compliance with national policies, and in this regard, it is noted that examiner paused the examination and asked for some of the supporting documents to be updated and re-consulted. The Government published a revised iteration of the National Planning Policy Framework in December 2023 ("NPPF 2023"). Although this document does not represent a significant shift away from the 2021 version referred to in the consultation SNP, some policies have been amended or expanded on. In particular, the NPPF 2023 adds greater detail to the approach for addressing the impacts of climate change and includes an increased emphasis on design quality.

### Basic Condition (a) – regard to national policy

The NPPF 2023 sets out the Government's planning policies for England and is forms part of the basic conditions test.

At the heart of the NPPF is a presumption in favour of sustainable development. Para. 11 states that development proposals which accord with an up-to-date development plan should be approved without delay. As per Para 11(d), when the most important policies for determining applications are out-of-date, permission should be granted unless:

- i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote 8 of the NPPF establishes that policies are to be considered "out-of-date" for applications involving the provision of housing in situations where (a) the local planning authority cannot demonstrate the required supply of deliverable housing sites.



Footnote 7 of the NPPF states that the policies referred to in (i) are those contained in the NPPF relating to, as relevant to the Site: land designated as Green Belt; an Area of Outstanding Natural Beauty; and designated heritage assets.

The draft NPPF (Summer 2024) proposes changes for decision-taking in respect to para 11(d), replacing 'policies which are most important for determining the application' for 'policies for the supply of land'. Given the conclusions at para 2.4 of this report, it is clear that should the new NPPF come into effect as drafted, the Council's policies for the supply of land are out of date.

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 67-68). The application of neighbourhood plans is proposed to remain unchanged in the draft summer 2024 NPPF version.

The new guidance on design mentioned in the NPPF shows the increasing importance on designing more attractive and sustainable spaces with communities in mind. Design has already been discussed throughout the SNP but, as the SNP was consulted on from June to August 2023 prior to the new guidance being released, there should be a more emphasis on design and sustainable design throughout the plan and this may mean revisions to the plan, in order to be complicit with the most up to date NPPF.

The first test to adhere to in the ordering of Basic Conditions is adherence to national policy or guidance, the most notable being the 2023 NPPF (paragraph 37), referred to above. National policy governs not just the approach to be taken by Local Planning Authorities, but all plans prepared to be used for determining planning applications. In this regard, RPS has provided a number of comments on the policies proposed by the Parish Council and suggests some refinements to ensure that there is general conformity with national policy.

It is through the lens of the NPPF 2023 that we can also look towards how the clause (d) is achieved in the context of achieving sustainable development. Although there is no defined position on what sustainable development is, we know that it involves the consideration and balance of social, economic and environmental factors. For the purposes of preparing a plan, consideration will need to be given to the intention of the policy devices, and what they seek to achieve. Plainly, there will be policies which focus specifically on one of the three 'pillars' of sustainable development, though there may be others which require a balancing exercise to be undertaken in coming to a view on the policy approach to be taken.

The other relevant consideration reflected on in the SNP is the consistency with the Development Plan. For the purposes of the SNP, this comprises the Core Strategy ('CS'), adopted in October 2011; the Development Management Policies Local Development Document ('DMP'), adopted in July 2013, and the Site Allocations Local Development Document ('SA'), adopted November 2014. Although the District Council have commenced a review of the Local Plan, which will consider an updated strategy for spatial growth, this can be given limited weight at present, and the Parish are correct in relying on the forementioned documents.

RPS does observe from the outset that the vast majority of the Plan area falls within the Green Belt and the Chilterns Area of Outstanding Natural Beauty ("AONB"). This statutory landscape designation is identified on within the SNP (Page 13), highlighting that the whole of the Plan area is washed over by the Green Belt or AONB.

In making responses to this consultation plan, RPS is mindful that many of the policies are framed against the protection of the Green Belt and AONB and what can be developed in this area. RPS contend that it is critical that all opportunities to deliver sustainable development that meets the housing needs of the District and that are consistent with the spatial strategy are not fettered by unduly restrictive or prescriptive policies brought forward through the neighbourhood planning process.

## **Basic Condition (e) – general conformity with the strategic policies of the development plan**

### **Policy 1: Development in Villages and Hamlets**

Policy 1 discusses the approach to spatial development and building within or on the edge of settlements. The second paragraph of the SNPD states that *“Proposals for development on the edge of the village and hamlets will only be supported where they are small scale and meet an identified local need”*.

It is noted that the SNP does not propose settlement boundaries, so the NDP does not define the boundary of the village areas, and as such, it is impossible to perceive spatially the extent of this area. The policy wording set out as part of this clause would lead to an impact comparable to the effect of Green Belt – creating a fixed settlement boundary that will not support any development beyond it. It is noted here that a large proportion of the parish falls within the AONB, and so by definition is already covered under a comprehensive set of protections. Whilst RPS supports the Parish Councils noble aim of promoting brownfield sites in the first instance, it is queried whether an additional tier of policy is required, or whether this could be achieved in a different way. In this context it may, therefore, be more appropriate to set out the policy parameters for development within or outside the settlements.

RPS considers that this proposal has the potential to undermine the strategic policies set by the Development Plan, by creating an environment that would effectively curtail any development outside the settlement boundary. Consequently, RPS considers that this particular clause needs to be amended in order to meet the Basic Conditions.

### **Policy 4: Housing Mix**

RPS supports the use of local evidence to assist in understanding what the area should deliver in the future. It is noted the Housing Needs Assessment (AECOM, Jan 2020) identified an acute shortage of three bed properties in Sarratt. On the face of it, the approach in the SNP does not appear unreasonable with a view to replenishing the 3-bed housing stock as well as building new 1 and 2-bed units will ensure better balance in the housing stock that addresses local needs.

The policy states, in policy 4.1, “Development proposals for all housing types should have a size mix consisting of dwellings of three bedrooms (50%), two bedrooms (30%) and one bedroom (20%) as recommended by the Sarratt Needs Assessment 2019”. The South West Hertfordshire Local Housing Needs Assessment (September 2020) is not quoted within the document, however it does provide a caveat for *“or as near to this as practical, subject to local need”*.

Whilst it is important to look back at what has been completed, RPS would also encourage the Parish to engage with what the future needs for the area are. Although this will unlikely be available at a Parish level, consideration may want to be given to the District Council's own evidence, the latest version prepared in September 2020, so superseding the Parish Council's evidence base date. As a means of making the policy compatible with national policy, and future proofed to any future evidence that the District Council may prepare, RPS would recommend that the policy is amended to indicate that development proposals can comply with the stated mix, *“or as near to this as practical, subject to local need, this can include housing proposals to take into account the range of housing needs, in terms of size and type of dwellings as identified by the Strategic Housing Market Assessment and subsequent updates”*.

### **Policy 5: Affordable Housing**

The policy states that the affordable housing requirement is to provide 40% on developments, unless schemes fall below the 1+ dwelling size/units threshold. In this context, the SNP broadly replicates the requirements from the adopted Core Strategy, available on the Council's website. Although these figures are not contested, RPS queries the inclusion of a policy which is a slight transposition and whether this is a necessary inclusion within the Plan.

## Conclusion on the basic conditions

The SNP fails to meet the Basic Conditions outlined in the PPG. Specifically, the SNP fails to comply with national policies, particularly the National Planning Policy Framework (NPPF) 2023. The SNP's policies on development in villages and spatial distribution of development are inconsistent with the NPPF and the development plan. For example, the SNP's restrictive approach to development on the edge of settlements may undermine some opportunities to deliver sustainable development that meets the housing needs of the District and that are consistent with the spatial strategy. Additionally, the SNP's housing mix policy may not reflect the latest housing needs identified by the District Council. To ensure compliance with the Basic Conditions, the SNP should be revised to align with the NPPF and the development plan, and to address the specific needs of the local area.

To conclude, RPS contend that the significant under-performance in the delivery of homes in Three Rivers since 2011, and the current precarious nature of the land supply position, are relevant considerations that should be recognised and taken into account in the framing of policies taken forward in the SNP, in line with national policy which seeks to boost significantly the supply of housing.

In this context, it is crucial that the SNP genuinely supports the delivery of the strategic policies and other plan policies and does not put barriers in place to the delivery of sites duly allocated through the development plan process.

Yours sincerely,  
for RPS Consulting Services Ltd



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**REPRESENTATIONS OF HERTFORDSHIRE COUNTY COUNCIL (HCC)  
GROWTH & INFRASTRUCTURE UNIT**

**ON BEHALF OF HCC (excluding HCC Property)**

**IN RELATION TO THE**

**SARRATT PARISH NEIGHBOURHOOD PLAN REGULATION 16  
RE-CONSULTATION VERSION**

**SEPTEMBER 2024**



## 1.0 Introduction

- 1.1 This representation is made by Hertfordshire County Council's (HCC) Growth & Infrastructure Unit, in relation to the Sarratt Parish Neighbourhood Plan (submission version) regulation 16 re-consultation. The comments within this representation reflect the interests of the following services that are provided by HCC, along with other relevant areas within the Environment & Infrastructure Department (excluding HCC Property):
- Libraries Services
  - Lead Local Flood Authority (HCC as LLFA)
  - Transport (HCC as Highways Authority)
- 1.2 The approach adopted within this representation follows the format of the re-consultation document itself. It should be noted that comments have only been made on the parts of the plan that are considered to be of relevance to HCC. Comments relating to a specific HCC service area and department have been stated. Sections 3 and 4 of this representation contain general comments from Highways and Local Lead Flooding Authority (LLFA) that are not policy specific.
- 1.3 Additional text that has been suggested as modifications have been underlined and text suggested for deletion ~~struck through~~.
- 1.4 The comments made within this representation also reflect HCC's commitment to moving towards more sustainable modes of transport and movement, as set out in the county council's Local Transport Plan (LTP4, adopted in May 2018) with the hierarchy of preference of provision being ordered as follows: walking, cycling, public transport, car use. The role that the enhancement of the Public Rights of Way network (whether footpaths or cycleways) can play to support aspirations to achieve modal share is also important to HCC.

## 2.0 HCC Comments on the Plan

### SECTION 1: Development in Villages and Hamlets

#### Policy 1

- 2.1 Transport. This policy should have reference to ensuring LTP4 access to sustainable transport. The policy should include the following:

<p><u>Consideration should be given to balancing the needs of all users but in accordance with the hierarchy providing improved opportunities for walking and cycling and other more sustainable modes ahead of motor vehicles when providing new streets in areas of growth and development to facilitate more sustainable journeys to be made to local areas and facilities.</u></p>
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- 2.2 The text above is suggested based on Policy 1: Transport User Hierarchy within HCC's Local Transport Plan 4.

*LTP4, Policy 1*

*“To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:*

- Opportunities to reduce travel demand and the need to travel*
- Vulnerable road user needs (such as pedestrians and cyclists)*
- Passenger transport user needs*
- Powered two wheeler (mopeds and motorbikes) user needs*
- Other motor vehicle user needs”*

## **SECTION 2: Design Principles**

### **Policy 2**

- 2.3 Transport. With respect to Appendix 3 of this neighbourhood plan, the Highway Authority recognises the value of good design and place making when considering Highway Layout and Dimensions. The latest HCC guidance on this matter is set out in the Hertfordshire Place and Movement Design Guide ([Place & Movement Planning and Design Guidance for Hertfordshire Part 3](#)). This document, and any subsequent revisions, set out the design expectations of the Highways Authority and it would be appropriate for this plan to align with those.

## **SECTION 9: Community Facilities**

Context 2<sup>nd</sup> paragraph

- 2.4 Libraries Services. The supporting text in this section should be amended as follows:

The rural nature of the parish means that a number of other premises provide a valuable community facility, either in their primary function (e.g. doctors' surgery and dispensing chemist) or as a secondary function for both informal and formal village organisations. Examples include: Pints of View, a church-based outreach discussion group held monthly in The Plough pub in Belsize and Book Club meetings held in the Cricketers Pub. Although there is no community library in Sarratt, Sarratt residents have access to the Hertfordshire County Council network of libraries. The closest libraries to Sarratt are Rickmansworth Library, Kings Langley Community Library and Chorleywood Community Library. A significant factor in this latter case was identified in the Herts CC consultation response to the consultation: that in Sarratt, there is an absence of community library facilities.

## **SECTION 12: Renewable Energy & Green Infrastructure**

### **Policy 12**

- 2.5 Transport. Greater emphasis must be placed on securing sustainable transport modes to align with the plan as a whole. Any proposed development site should be developed to facilitate walking and cycling for short utility trips, providing adequate footways and cycle parking and provisions to ensure the development is sustainable.
- 2.6 Electric Vehicle charging should be in line with HCC EV strategy to include that new developments should include electric vehicle charging as per HCC's Electric Vehicle Strategy.

### **3.0 General comments from Lead Local Flood Authority (LLFA)**

- 3.1 The general comments made in the original Regulation 16 consultation stand. These comments are repeated here for completeness.
- 3.2 In addition to the previous feedback, the LLFA would recommend the Plan seeks to direct all new developments away from areas at flood risk. Avoidance is the most sustainable form of managing flood risk.
- 3.3 It is to note that according to the Strategic Environment Assessment (SEA, an assessment prepared by Place Services (2022)) there are no reported flood incidents in the Sarratt Neighbourhood Area, however there are still various sources of flood risk in the area. These include surface water, rivers and ordinary watercourses and groundwater. LLFA is pleased to see that the SEA refers to areas within Flood Zones 2 and 3. The SEA notes that the Plan contains no policies to address flood risk.
- 3.4 The LLFA is pleased to see that section 3 Design Guidelines refers to drainage infrastructure, and paragraph 3.2.2 Roads refers to sustainable drainage opportunities.
- 3.5 The LLFA would highly recommend that the Plan is updated to include greater reference and requirement for the use of Sustainable Drainage Systems (SuDS) in developments in the area. SuDS should be used in all developments to mitigate the increase in permeable area by mimicking natural drainage processes.
- 3.6 SuDS features include structures such as attenuation basins/pond, blue-green roofs, swales, permeable paving, rain gardens and so on, and can be used to capture, attenuate and slowly release surface water in order to reduce pressure on local drainage infrastructure.
- 3.7 Above-ground SuDS can and should be delivered on all developments to capture, attenuate and regulate the flow of water, averting the potential impact of increased impermeable surfacing. In doing so, developments should not increase flood risk and may even provide flood risk betterment. Furthermore, the use of SuDS can improve the water quality of runoff that may eventually be discharged to natural assets such as rivers or ordinary watercourses This is

particularly important when draining surfaces that may contain contaminants, such as roads or car parks.

- 3.8 A source control approach whereby SuDS features and surface water attenuation are distributed around the site should be prioritised, instead of a traditional “pipe to basin” solution where the vast majority of surface water storage is provided in a single large structure.
- 3.9 SuDS can also be retrofit on a local level. Features such as permeable paving, rain gardens and tree pits can be implemented locally to provide the benefits described above at relatively low cost. If the Sarratt Neighbourhood Plan Working Group wishes to seek advice regarding the use of retrofit SuDS, the LLFA would be happy to advise.
- 3.10 If consulted by the Local Planning Authority Three Rivers District Council on future major planning applications in the Sarratt Neighbourhood Area, the LLFA will require the use of above-ground SuDS unless they can be demonstrated unfeasible through technical justification and ensure surface water is managed effectively by any new development.
- 3.11 It is worth noting that the Government seeks to implement Schedule 3 of the Flood and Water Management Act 2010 in 2024. Schedule 3 will require Hertfordshire County Council LLFA to create a SuDS Approval Body (SAB). The role of the SAB is to ensure all new developments make appropriate use of SuDS, and the SAB will then adopt any SuDS serving more than 1 property.
- 3.12 Once the SAB is implemented, all developments of more than 1 property or 100m<sup>2</sup> will need to apply to the SAB for consent. Construction cannot begin until SAB consent is granted, regardless of any planning permission. This is therefore different to the existing situation where the LLFA is statutory consultee in the planning process but has no adoption or enforcement responsibilities. Please note that the Government is yet to specifically confirm its expectations of the SAB, however the above is likely to apply based on the policy within FWMA 2010.
- 3.13 All developments should comply with local and national design SuDS guidance such as HCC’s LFRMS2, the national non-statutory technical standards and so on. Further information is available on HCC website - <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/flooding-in-hertfordshire.aspx>

#### **4.0 General comments from Transport**

- 4.1 HCC seeks to ensure that neighbourhood plans can provide a safe, efficient, and resilient transport system that serves the needs of businesses and residents across Hertfordshire, while minimising impact on the environment. The comments made within this representation reflect HCC’s commitment to moving towards more sustainable modes of transport and movement as set out in the Hertfordshire Local Transport Plan.



- 4.2 Hertfordshire County Council's adopted Local Transport Plan 4 (LTP4) and its supporting documents set out the long-term transport strategy for the County to accommodate the levels of housing and employment growth being identified by the District Councils in their emerging Local Plans.
- 4.3 The LTP4 provides a framework to guide all our future transport planning and investment.
- 4.4 The LTP provides a policy foundation for a balanced approach to transport and consistently promoting and enabling sustainable transport and sustainable travel behaviour in order to support better economic, social, and environmental outcomes for the county in a context of growth. The LTP accelerates the transition from previous transport plans and strategies that were largely focused on the car to a more balanced approach which caters for all forms of transport and seeks to encourage a switch from the private car to sustainable transport (e.g. walking, cycling and passenger transport) wherever possible. The founding policy of the LTP4 establishes a Transport User Hierarchy, which sets out that in the development and design of any plan, project or scheme consideration should be given in the following order to:
- Opportunities to reduce the need to travel
  - Vulnerable road user needs (such as pedestrians and cyclists)
  - Passenger transport user needs
  - Powered two wheeler (mopeds and motorbikes) user needs
  - Other motor vehicle user needs
- 4.5 Local Plans and Neighbourhood Plans must align with and support the delivery of LTP policies and objectives.
- 4.6 The Highway Authority is a statutory consultee to planning applications submitted to Three Rivers District Council. These are assessed and considered in the context of the current legislation. Both national and local policies are considered in relation to sustainable transport. New development proposals are expected to support delivery of the LTP objectives and align with its policies, including those contained within any of its supporting documents. New developments are expected to also adhere to guidance documents such as the county council's Highway Design Standards (as outlined in Roads in Hertfordshire or any successor document to this), and any national design guidance this recommends such as Manual for Streets. Developers need to ensure that their development sites support their share of the required infrastructure and service improvements and are accessible by all transport modes. Any new roads and streets within new development and any associated off-site highway infrastructure will have to undergo appropriate scrutiny, including that it promotes highway safety.
- 4.7 The County Council have developed a number of Growth and Transport Plans (GTP) which will sit as supporting documents to LTP4. The South Western Growth and Transport Plan (SWGTP) was adopted in January 2021. The GTP is a strategic spatial transport plan consisting of the southern portion of the M1

corridor and includes the towns of Watford, Hemel Hempstead and Rickmansworth.