

Three Rivers District Council

**Abbots Langley
Neighbourhood Plan
2025 to 2041**

Independent Examiner's Report

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Summary

I have been appointed by Three Rivers District Council to carry out the independent examination of the Abbots Langley Neighbourhood Development Plan.

Abbots Langley comprises a series of distinct communities. Each community has been reviewed to consider its self-sufficiency with regard to nearby facilities such as shops, health care, education, leisure activities and public transport services. The intention is to show the extent to which communities can become '20-minute' neighbourhoods. Five distinctive Character Areas have been identified. The Plan area has two Conservation Areas as well as a wealth of other historic features and associations. It is also home to the Warner Bros Studios. Abbots Langley itself is a District Centre and a Village Centre Masterplan has been prepared to look at its future in a sustainable way.

This ambitious Plan has 20 policies covering a wide variety of topics from service provision to Local Green Spaces to allotments to community facilities and heritage. Given the position of the emerging Local Plan, this Plan does not seek to allocate any sites for development, but prefers to set out some parameters for new development and considers matters of particular local importance to the community.

A number of modifications have been recommended; in the main these are intended to ensure the Plan is clear and precise providing a practical framework for decision-making as required by national policy and guidance.

Subject to those modifications, I have concluded that the Plan does meet the basic conditions and all the other requirements I am obliged to examine. I am therefore pleased to recommend to Three Rivers District Council that the Abbots Langley Neighbourhood Plan can go forward to a referendum.

In considering whether the referendum area should be extended beyond the Neighbourhood Plan area I see no reason to alter or extend this area for the purpose of holding a referendum.

Ann Skippers MRTPI
Ann Skippers Planning
March 2026



1.0 Introduction

This is the report of the independent examiner into the Abbots Langley Neighbourhood Development Plan (the Plan).

The Localism Act 2011 provides a welcome opportunity for communities to shape the future of the places where they live and work and to deliver the sustainable development they need. One way of achieving this is through the production of a neighbourhood plan.

I have been appointed by Three Rivers District Council (TRDC) with the agreement of the Parish Council to undertake this independent examination.

I am independent of the qualifying body and the local authority. I have no interest in any land that may be affected by the Plan. I am a chartered town planner with over thirty years experience in planning and have worked in the public, private and academic sectors and am an experienced examiner of neighbourhood plans. I therefore have the appropriate qualifications and experience to carry out this independent examination.

2.0 The role of the independent examiner and the examination process

Role of the Examiner

The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The basic conditions¹ are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, retained European Union (EU) obligations²
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

¹ Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and paragraph

² "EU obligation" was substituted for "retained EU obligation" by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018/1232 which came into force on 31 December 2020

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to neighbourhood plans and was brought into effect on 28 December 2018.³ It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check⁴ whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that
- Its policies relate to the development and use of land for a designated neighbourhood area.

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.⁵

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or
- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

If the plan can proceed to a referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

If the plan goes forward to referendum and more than 50% of those voting vote in favour of the plan then it is made by the relevant local authority. The plan then becomes part of the 'development plan' for the area and a statutory consideration in guiding future development and in the determination of planning applications within the plan area.

³ Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018/1307

⁴ Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

⁵ The combined effect of the Town and Country Planning Act 1990 (as amended), Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

Examination Process

It is useful to bear in mind that the examiner's role is limited to testing whether or not the submitted neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and paragraph 11 of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended).⁶

Planning Practice Guidance (PPG) confirms that the examiner is not testing the soundness of a neighbourhood plan or examining other material considerations.⁷

The fact that a modification would be of benefit is not a sufficient ground in itself to recommend it. So, for example, the fact that a policy could be added to or strengthened does not justify a modification unless this is necessary for the reasons given above.

In addition, PPG is clear that neighbourhood plans are not obliged to include policies on all types of development.⁸ Often representations suggest new policies on different topics or suggest amendments to the policies or the supporting text or different approaches. As explained above, where I find that policies do meet the basic conditions, it is not necessary for me to consider if further amendments or additions are required. Sometimes representations ask for additions that fall outside the remit of the planning system.

PPG⁹ explains that it is expected that the examination will not include a public hearing. Rather the examiner should reach a view by considering written representations. Where an examiner considers it necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case, then a hearing must be held.¹⁰

I sought clarification on a number of matters from the Parish Council and TRDC in writing on 2 February 2026. My list of questions is attached to this report as Appendix 2. I am grateful to both Councils who have provided me with comprehensive answers to my questions. These responses received (all publicly available) together with consideration of all the documentation and the representations made, have enabled me to examine the Plan without the need for a hearing.

In 2018, the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) published guidance to service users and examiners. Amongst other matters, the guidance indicates that the qualifying body will normally be given an opportunity to comment upon any representations made by other parties at the Regulation 16 consultation stage should they wish to do so. There is no obligation for a qualifying body to make any comments; it is only if they wish to do so. The Parish Council made

⁶ Paragraph 11(3) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended) and PPG para 055 ref id 41-055-20180222

⁷ PPG para 055 ref id 41-055-20180222

⁸ Ibid para 040 ref id 41-040-20160211

⁹ Ibid para 056 ref id 41-056-20180222

¹⁰ Ibid

comments on the Regulation 16 stage representations and I have taken these into account.

I am grateful to everyone for ensuring that the examination has run so smoothly and in particular Aaron Roberts and Perry Lowson at TRDC.

I made an unaccompanied site visit to familiarise myself with the Plan area on 14 February 2026.

Modifications and how to read this report

Where necessary for the Plan to meet the basic conditions and other legal requirements, modifications have been recommended. These appear in this report as Modification Number (MN) MN1, MN2, MN3 and so on. For ease of reference, the modifications are shown in the Schedule of Proposed Modifications Annex attached to this report on page 44. Where I have suggested specific changes to the wording of the policies or new wording these appear in *italics*.

As a result of some modifications consequential amendments will be required. These can include changing policy numbering, section headings, amending the contents page, renumbering paragraphs or pages, ensuring that supporting appendices and other documents align with the final version of the Plan and so on.

I regard these issues as primarily matters of final presentation and do not specifically refer to all such modifications, but have an expectation that a common sense approach will be taken and any such necessary editing will be carried out and the Plan's presentation made consistent.

3.0 Neighbourhood plan preparation

A Consultation Statement has been submitted.

Work began on the Plan in 2014 with the Plan area designated.

In early 2016, a Steering Committee was established comprising local Councillors and volunteers from the local community to lead the preparation of the Plan. Bi-monthly Progress Reports were made to the Parish Council meetings. A dedicated area was set up on the Parish Council website. Social media was used. An information leaflet was distributed to households, businesses and organisations. A 'Commonplace' website was set up where residents and others could input views about the Parish on an interactive mapping website. Over the next four years, community engagement took place, evidence was gathered and evidence such as the Local Housing Needs Assessment work commissioned. This included local events, area meetings and regular articles in the local magazine. Meetings were held with residents groups and others such as NHS. At the same time, input was made on the emerging Local Plan.

The residents in Bedmond designed a survey specifically for that area which has been translated into work on the Plan.

After informal engagement on the draft Plan that included focus groups and exhibitions, and work on the Village Centre Masterplan, pre-submission (Regulation 14) consultation took place between 9 December 2024 and 31 January 2025. Copies were available online and in person. The consultation was publicised through social media, the local magazines, and direct email. A summary was also prepared.

I consider that the consultation and engagement carried out is satisfactory.

Submission (Regulation 16) consultation was carried out between 20 June and 3 August 2025. The Regulation 16 stage resulted in 26 representations. Whilst I may refer specifically to some and not to others, I have considered all of the representations and taken them into account in preparing my report.

4.0 Compliance with matters other than the basic conditions

Qualifying body

Abbots Langley Parish Council is the qualifying body able to lead preparation of a neighbourhood plan. This requirement is satisfactorily met.

Plan area

The Plan area is coterminous with the administrative boundary for the Parish Council. TRDC approved the designation of the area on 18 November 2014. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements. The Plan area is shown on page 9 of the Plan.

Plan period

The Plan period is 2025 – 2041. This is confirmed in the Plan itself. The requirement is therefore satisfactorily met.

Excluded development

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement. This is also helpfully confirmed in the Basic Conditions Statement.

Development and use of land

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the

community's priorities for the future of their local area, but are not related to the development and use of land. If I consider a policy or proposal to fall within this category, I will recommend it be clearly differentiated. This is because wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable.¹¹

In this case, the Plan includes a number of community aspirations. These are explained in the Plan¹² and contained in Section 16.

5.0 The basic conditions

Regard to national policy and advice

The Government replaced previous versions of the NPPF with a new NPPF which was published in December 2024. This was amended in February 2025 to correct some cross-references to footnotes and to clarify the intent of paragraph 155.

The NPPF is the main document that sets out the Government's planning policies for England and how these are expected to be applied.

In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the delivery of strategic policies in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.¹³

Non-strategic policies are more detailed policies for specific areas, neighbourhoods or types of development.¹⁴ They can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment as well as set out other development management policies.¹⁵

The NPPF also makes it clear that neighbourhood plans gives communities the power to develop a shared vision for their area.¹⁶ However, neighbourhood plans should not promote less development than that set out in strategic policies or undermine those strategic policies.¹⁷

¹¹ PPG para 004 ref id 41-004-20190509

¹² The Plan, page 8

¹³ NPPF para 13

¹⁴ Ibid para 29

¹⁵ Ibid

¹⁶ Ibid para 30

¹⁷ Ibid

The NPPF states that all policies should be underpinned by relevant and up to date evidence; evidence should be adequate and proportionate, focused tightly on supporting and justifying policies and take into account relevant market signals.¹⁸

Policies should be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. They should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area including those in the NPPF.¹⁹

On 6 March 2014, the Government published a suite of planning guidance referred to as Planning Practice Guidance (PPG). This is an online resource available at www.gov.uk/government/collections/planning-practice-guidance which is regularly updated. The planning guidance contains a wealth of information relating to neighbourhood planning. I have also had regard to PPG in preparing this report.

PPG indicates that a policy should be clear and unambiguous²⁰ to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the planning context and the characteristics of the area.²¹

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.²² It continues that the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.²³

Whilst this has formed part of my own assessment, the Basic Conditions Statement clearly and thoroughly sets out how the Plan's vision, objectives and policies have regard to the NPPF.

Contribute to the achievement of sustainable development

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development.

The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.²⁴ This means that the planning system has three overarching and interdependent objectives which should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives.²⁵

¹⁸ NPPF para 32

¹⁹ Ibid para 16

²⁰ PPG para 041 ref id 41-041-20140306

²¹ Ibid

²² Ibid para 040 ref id 41-040-20160211

²³ Ibid

²⁴ NPPF para 7

²⁵ Ibid para 8

The three overarching objectives are:²⁶

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but should take local circumstances into account to reflect the character, needs and opportunities of each area.²⁷

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how the Plan helps to achieve each of the objectives of sustainable development as outlined in the NPPF and contains a robust discussion of how the Plan contributes.

General conformity with the strategic policies in the development plan

The development plan consists of a number of different documents.

The Three Rivers Core Strategy 2011 – 2026 (CS) covers the whole of the District and sets out in broad terms how future development will be planned for as well as promoting more sustainable development in general. It was adopted on 17 October 2011.

The Development Management Policies (DMP) sets out the criteria against which all planning applications within the District will be considered, alongside those set out in the adopted Core Strategy. It was adopted on 26 July 2013.

The Site Allocations Local Development Document (SALDD) supports the delivery of the Core Strategy and allocates specific sites to meet needs for housing, employment, education, shopping and open spaces. As part of this, changes are made to the Green Belt boundary. It was adopted on the 25 November 2014.

In addition to the above documents, the Hertfordshire Minerals Local Plan 2002 – 2016

²⁶ NPPF para 8

²⁷ Ibid para 9

and Waste Core Strategy and Development Management Policies 2011-2026 and Waste Site Allocations Development Plan Document 2011-2026 covering the whole County and produced by Hertfordshire County Council (HCC) relate to minerals and waste form part of the development plan alongside other made neighbourhood plans.

TRDC have very helpfully confirmed all of the policies in the CS are strategic. In addition there are six policies in the DMP considered to be strategic in nature and of relevance to this examination and six strategic policies in the SALDD. The policies are DMP Policies DM2, DM3, DM4, DM6, DM11 and DM12 and SALDD Policies SA1, SA3, SA4, SA5, SA7 and SA8.

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how the Plan conforms to relevant development plan policies.

Where I have not specifically referred to a strategic policy, I have considered all strategic policies in my examination of the Plan.

Emerging policy

TRDC is preparing a new Local Plan which will provide the planning policies and proposals for the District to 2041. A Local Plan Regulation 18 Newly Submitted Sites and New Policies consultation was held; this ended on 31 August 2025.

On 5 February 2026, TRDC were issued a Holding Direction Letter by the Minister of State for Housing and Planning. This letter directed TRDC to “not to take any step in connection with the adoption of the Plan” whilst the Minister considers whether to give a direction in relation to the Plan under section 21 of the Planning and Compulsory Purchase Act 2004 Act.

There is no legal requirement to examine the Plan against emerging policy. However, PPG²⁸ advises that the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which the Plan is tested.

Furthermore Parish Councils and local planning authorities should aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local plan and the adopted development plan with appropriate regard to national policy and guidance.²⁹

It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan because the Planning and Compulsory Purchase Act 2004 requires that any conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.³⁰

²⁸ PPG para 009 ref id 41-009-20190509

²⁹ Ibid

³⁰ Ibid para 009 ref id 41-009-20190509

PPG advises that where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.³¹

I will refer to the latest publicised version of the emerging local plan where I feel it relevant to do so.

Retained European Union Obligations

A neighbourhood plan must be compatible with retained European Union (EU) obligations. A number of retained EU obligations may be of relevance for these purposes including those obligations in respect of Strategic Environmental Assessment, Environmental Impact Assessment, Habitats, Wild Birds, Waste, Air Quality and Water matters.

With reference to Strategic Environmental Assessment (SEA) requirements, PPG³² confirms that it is the responsibility of the local planning authority to ensure that all the regulations appropriate to the nature and scope of the draft neighbourhood plan have been met. It states that it is the local planning authority who must decide whether the draft plan is compatible with relevant retained EU obligations when it takes the decision on whether the plan should proceed to referendum and when it takes the decision on whether or not to make the plan.

Strategic Environmental Assessment and Habitats Regulations Assessment

The provisions of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') concerning the assessment of the effects of certain plans and programmes on the environment are relevant. The purpose of the SEA Regulations, which transposed into domestic law Directive 2001/42/EC ('SEA Directive'), are to provide a high level of protection of the environment by incorporating environmental considerations into the process of preparing plans and programmes.

The provisions of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), which transposed into domestic law Directive 92/43/EEC (the 'Habitats Directive'), are also of relevance to this examination. They constitute retained EU law under the European Union (Withdrawal) Act 2018 and section 5 of the Retained EU Law (Revocation and Reform) Act 2023.

³¹ PPG para 006 ref id 61-006-20190723

³² Ibid para 031 ref id 11-031-20150209

The Conservation of Habitats and Species Regulations 2017 were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019/579 but they were not intended to introduce any change in policy³³.

Regulation 63 of the Habitats Regulations requires a Habitats Regulations Assessment (HRA) to be undertaken to determine whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. The HRA assessment determines whether the Plan is likely to have significant effects on a European site considering the potential effects both of the Plan itself and in combination with other plans or projects. Where the potential for likely significant effects cannot be excluded, an appropriate assessment of the implications of the Plan for that European Site, in view of the Site's conservation objectives, must be carried out. Case law has established that article 6(3) requires a strict "precautionary approach" and the Habitat Regulations should be interpreted "purposively".

On 28 December 2018, the basic condition prescribed in Regulation 32 and Schedule 2 (Habitats) of the Neighbourhood Planning (General) Regulations 2012 (as amended) was substituted by a new basic condition brought into force by Regulation 3(2) of the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018/1307 which provides that the making of the plan does not breach the requirements of Chapter 8 of Part 6 of the Habitats and Species Regulations 2017.

A SEA and HRA Screening Report dated February 2023 and prepared by Place Services has been submitted.

This concludes that the Plan is not predicted to have likely significant effects, either alone or in combination with other plans and projects and therefore 'screens out' SEA. Consultation was carried out with the statutory consultees. Both Natural England and Historic England agreed with the conclusion, whilst the Environment Agency did not respond.

I have treated the Screening Report to be the statement of reasons that the PPG advises must be prepared and submitted with the neighbourhood plan proposal and made available to the independent examiner where it is determined that the plan is unlikely to have significant environmental effects.³⁴

Taking account of the characteristics of the Plan, the information put forward and the characteristics of the areas most likely to be affected, I have no reason to disagree with the conclusions of the Screening Report and consider that the requirements in respect of SEA have been met.

³³ CG Fry & Son Limited V Secretary of State for Housing< Communities and Local Government (formerly known as SoS for LU, H&C) & anor [2025] UKSC 35at para 32

³⁴ PPG para 028 ref id 11-028-20150209

With regard to HRA, the Screening Report identifies three sites of relevance; the Burnham Beeches Special Area of Conservation (SAC), the Chilterns Beechwoods SAC and the Wormley Hoddesdonpark Woods SAC.

The Screening Report concludes that no likely significant effects are predicted, either alone or in combination with other plans and projects. Consultation with Natural England has taken place and they concur that significant effects are unlikely, either alone or in combination.

Taking into account the distance from, the nature and characteristics of the European sites and the nature and contents of the Plan, I have no reason to disagree with the conclusion of the Screening Report and consider that the prescribed basic condition relating to the Conservation of Habitats and Species Regulations 2017 is complied with.

European Convention on Human Rights (ECHR)

The Basic Conditions Statement contains a basic statement in relation to human rights and equalities. Having regard to the Basic Conditions Statement, there is nothing in the Plan that leads me to conclude there is any breach or incompatibility with Convention rights.

6.0 Detailed comments on the Plan and its policies

In this section I consider the Plan and its policies against the basic conditions.

The Plan is presented to a very high standard and contains 20 policies. There is a helpful and comprehensive contents page at the start of the Plan.

I have noticed that one or two of the references to paragraphs of the NPPF are based on an older version of that document. These can be checked and any necessary updates made as part of the final editorial checks.

In addition, there are some other corrections, such as the name of the Lead Local Flood Authority to be undertaken. These corrections can be made at the final editorial stage.

1. Executive Summary

The executive summary sets the scene well.

2. Introduction

This section is well written and well presented and contains a wealth of information about the Plan.

TRDC has suggested some minor corrections to this section that can be dealt with as part of a final editorial check.

3. Vision and Objectives

It is clear that a great amount of time and effort has gone into engaging the local community to determine the main issues of concern. These are summarised well in this section and lead directly onto a vision for the area.

The detailed and distinctive vision is underpinned by eight objectives. Both the vision and the objectives are clearly articulated and relate to the development and use of land putting sustainable development at the heart of the Plan.

TRDC has suggested some minor corrections to this section that can be dealt with as part of a final editorial check.

4. An Introduction to Abbots Langley Parish

This section details the characteristics of the Plan area in a straightforward, informative way supported by helpful illustrative material.

TRDC has suggested updating the text in paragraph 4.12; this can readily be done as part of any final editorial checks.

5. Spatial Strategy

The Plan explains that significant housing development over the last 20 years or so has meant that the population of the Parish has increased by some 25% to around 22,000. The local community is keen to ensure that any further housing growth is accompanied by the requisite infrastructure which is already under considerable pressure.

Engagement with the local community revealed a desire to keep development within the settlement boundaries, to prioritise brownfield land and to protect the Green Belt and other areas of open green space.

It is useful at this juncture to set out the planning policy context for the Parish.

Adopted development plan policy sets a housing target for the District of 4,500 dwellings or 180 dwellings per annum between 2001 and 2026.

Abbots Langley and Leavesden and Garston are identified as Key Centres. Bedmond is identified as a Village. The Parish falls within the Green Belt apart from the Key Centres but including Bedmond which is currently 'washed over'.

The CS's Spatial Strategy indicates that new development will be directed towards previously developed land and the Key Centres. CS Policy PSP2 states that about 60% of

the District's housing requirements should be provided in the Key Centres. It refers to the Leavesden Aerodrome site as suitable for mixed use development.

It seeks to maintain and enhance shopping frontages in Abbots Langley to meet local needs including through modest increases in retail floorspace. It refers to conserving and enhancing the local distinctiveness of the Key Centres referring to the historic core of Abbots Langley.

It promotes an integrated approach to improve movement and promotes a number of projects including the improvement of outdoor leisure facilities.

The CS's spatial strategy explains that limited development to meet local needs will take place in Bedmond, recognising the need to sustain the more rural areas.

CS Policy PSP4 sets out expectations for development in the Villages of Bedmond and Sarratt. Development will be strictly controlled to protect the character, landscape, heritage and wildlife of the countryside and the openness of the Green Belt. There is some scope for limited small-scale development in or on the edge of the village to meet local community and business needs and to sustain the vitality of the village. It refers to the improvement of facilities at Bedmond Sports and Social Club and the expansion of schools.

Around 1% of the District's housing requirements over the CS plan period including affordable housing are to be provided in the Villages.

CS Policy CP1 is an overarching policy on sustainable development.

CS Policy CP11 refers to Green Belt. DMP Policy DM2 refers to the Green Belt setting out the exceptions.

I have considered if there has been a significant change in circumstances that affects the housing requirements given the introduction of the standard method in the NPPF 2023 and PPG. The CS cannot be wholly relied upon to provide a reliable basis for housing numbers given it predates more recent national policy. The Plan does not allocate any sites for development. This stance has been agreed with TRDC and can be regarded as a pragmatic approach given the strategic work that will need to be progressed at District level.

Furthermore, there is no obligation for neighbourhood plans to allocate sites for housing³⁵, but the NPPF and PPG offer encouragement to neighbourhood planning bodies to meet their housing need³⁶ and to consider the allocation of small and medium sites.³⁷ I have taken the view that given the emerging situation at TRDC level, there would be little benefit to this Plan addressing housing needs, but have sought to ensure that policies would not constrain the delivery of District level strategies. The Plan also

³⁵ PPG para 040 ref id 41-040-20160211; para 104 ref id 41-104-20190509

³⁶ Ibid para 103 ref id 41-103-20190509

³⁷ NPPF para 74

seeks to set out some parameters to support the spatial strategy emerging at TRDC level.

Policy AL1: Spatial Strategy: Location and Scale of Development

Policy AL1 has two elements. Firstly it supports development within the defined settlement boundaries and particularly supports the use of brownfield sites.

The second element addresses sites outside the defined settlement boundaries, setting out five criteria. The first refers to national and TRDC level policies. TRDC has suggested amended wording and I agree this would help with clarity and precision. Modification **MN1** is duly recommended.

The second criterion refers to the coalescence of the individual settlements in the Parish and notably Bedmond and Abbots Langley. The third relates to scale and nature. The fourth relates to maintaining the natural and built function of the area. The last criterion refers to reusing redundant farm buildings or historic buildings.

I consider it is appropriate to set out the types of development that will be supported outside the defined settlement boundaries. The references to national policy, which includes grey belt, and the most recent development plan are sensible.

Coalescence is a valid planning concern and I saw at my site visit that it is important to ensure that the individual communities retain a sense of identity and distinctiveness.

The third criterion regarding scale and nature seems logical.

However, it is not clear to me what the fourth criterion is aiming at and for that reason modification **MN1** is made to remove this criterion.

The fifth criterion refers only to historic buildings and redundant farm buildings and should be extended to include all rural buildings. This would then be in line with the stance taken in the NPPF which supports a prosperous rural economy and refers to agricultural and other land-based rural businesses.³⁸ Alongside some changes to improve the syntax, modification **MN1** addresses this point.

With modification **MN1** to the first, fourth and fifth criteria, the policy will meet the basic conditions by having regard to the NPPF, being in general conformity with the relevant development plan policies referred to above and helping to achieve sustainable development.

The supporting text at paragraph 5.4 on page 27 requires some natural updating with the passage of time. Modification **MN2** addresses this.

³⁸ NPPF para 88

The supporting text at paragraph 5.10 has generated a comment from TRDC and modification **MN3** seeks to address this.

6. Housing

Policy AL2: Housing Mix

The NPPF which states that to help support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.³⁹ It continues that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.⁴⁰

Within this context, it is clear that size, type and tenure of housing needed for different groups in the community should be assessed and reflected in policy.⁴¹ These groups include affordable housing, families with children, older people and those with disabilities and people wishing to commission or build their own homes.⁴²

In rural areas, the NPPF explains that policies should be responsive to local circumstances and support housing developments that reflect local needs.⁴³

Policy AL2 seeks to ensure that new housing development meets local needs. It refers to a Housing Needs Assessment dated 2017, prepared by AECOM, and a more recent Strategic Local Housing Needs Assessment. The policy sets out a number of principles including the need for smaller homes. It seeks affordable housing to be in line with TRDC requirements and tenure blind with priority given to local needs and local residents.

The second and third elements of the policy specifically refer to housing for older people and self and custom-build housing respectively.

The HNA is based on a proposed Plan period of 2017 – 2032 and was written in 2017. It took a pragmatic approach to the information available at that time and arrived at a figure of 1800 – 1850 new dwellings for the Plan period. However, the Plan period has altered to 2025 – 2041 and national policy on dwelling figure calculations has changed. Therefore, in my view, the HNA is now somewhat out of date. This element of the policy should be future-proofed.

However, the premise of the policy – the need to meet identified local housing needs and the support for older people and lifetime homes, referred to in the Design

³⁹ NPPF para 61

⁴⁰ Ibid

⁴¹ Ibid para 63

⁴² Ibid

⁴³ Ibid para 82

Guidance and Codes, produced by AECOM⁴⁴, - remains valid. I note that the Local Housing Needs Assessment of March 2024 finds that there is a need to increase the supply of accessible and adaptable housing as well as housing for older people. It also identifies a need for smaller homes.

I note that TRDC point out that the NPPF does not include prescriptive requirements for First Homes. The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement (WMS) dated 24 May 2021, no longer applies. However, First Homes can continue to be delivered where they would meet local need⁴⁵ and the First Homes exception site policy set out in the WMS remains extant.⁴⁶

Modification **MN4** seeks to update and future-proof the policy. With this modification, the policy will meet the basic conditions. It has regard to national policy, contributes to the achievement of sustainable development and is in general conformity with strategic policy, and is a local expression of CS Policy CP1 which seeks to provide housing across a range of tenures and types and CS Policy CP3 which promotes high quality residential development which provides a range of housing types and sizes including the provision of housing for older people.

7. Local Character, Heritage and Design

This section of the Plan contains four policies.

The NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.⁴⁷ Being clear about design expectations is essential for achieving this.⁴⁸

It continues that neighbourhood planning groups can play an important role in identifying the special qualities of an area and explaining how this should be reflected in development.⁴⁹ It refers to design guides and codes to help provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design.⁵⁰

It continues that planning policies should ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history whilst not preventing change or innovation, establish or maintain a strong sense of place, optimise site potential and create places that are safe, inclusive and accessible.⁵¹

⁴⁴ Design Guidance and Codes, BU 01, page 70

⁴⁵ NPPF footnote 31

⁴⁶ Ibid footnote 35

⁴⁷ Ibid para 131

⁴⁸ Ibid

⁴⁹ Ibid para 132

⁵⁰ Ibid para 133

⁵¹ Ibid para 135

A Design Guidance and Codes document has been produced by AECOM. This identifies five character areas shown on Figure 12 on page 41 of the Plan and sets out how proposals for new development should respond to each through a series of design codes.

CS Policy PSP4 indicates development should be well-designed and inclusive, in keeping and in scale with the location and sensitive to the character of the countryside and local distinctiveness. CS Policy CP1 seeks to protect and enhance natural, built and historic environments from inappropriate development and improve the diversity of wildlife and habitats. CS Policy CP12 seeks a high standard of design that expects new development to have regard to the local context and conserve or enhance the character, amenities and quality of an area. It refers to natural and heritage assets as well as detailed matters such as scale and height and supports resilience to take account of climate change in a site's design. It seeks the retention or enhancement of important natural features.

Non-strategic DMP Policy DM1 refers to residential design and layout.

Policy AL3: Character of Development and Policy AL4: Design of Development

Both Policies AL3 and AL4 use the Design Guidance and Codes document as a basis for setting out principles to ensure that new development is of a high quality design and respects its context whilst not stifling innovation.

Policy AL3 refers to the two Conservation Areas in the Parish and aligns them with the Character Areas identified in the Design Guidance and Design document. They have a different status and so should, in my view, be separated out in the policy. The policy should also reflect the statutory duty; Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 refers to the desirability of preserving or enhancing the character or appearance of that area. Modification **MN5** to Policy AL3 is therefore made.

TRDC make two points in relation to this policy; the first relates to criteria B. vi. and vii.. These refer to parking, traffic generation and vehicular and pedestrian safety. Whilst they are similar to other policies, for completeness and because there are other policies in this Plan which refer to parking, in my view, it is acceptable to retain these points.

The second point made relates to criterion C. iii. which refers to sites abutting open countryside and its reference to "larger buildings". I agree this could lead to some ambiguity and so modification **MN5** is recommended. The importance of rural edges is identified as a characteristic of the area. The Design Guidance and Codes argues that the transitional edges between a settlement and the countryside should be softened by landscaping.⁵² A number of codes, SL 01, LC 02 and SU 02 are also relevant.⁵³

⁵² Design Guidance and Codes, page 52

⁵³ Ibid, pages 52, 103 and 113

In relation to Policy AL4, again there are some amendments to make to ensure the policy reads well and provides a practical framework for decision making.

With regard to criterion i., it should align with the proposed modifications to Policy AL3. Modification **MN6** is recommended.

With regard to criterion iii., I note that three or more storey development is not supported on or adjoining the boundary of sites adjacent to the settlement boundary abutting open countryside. The Design Guidance and Codes indicates that generally development is of two storeys in each Character Area.⁵⁴ Code BU 02 refers to two storeys, but does not impose any height restriction.⁵⁵ TRDC has suggested some flexibility be included and I agree. Modification **MN6** is recommended.

With regard to criterion viii., there is no basis for not considering garages as parking spaces. Indeed the Design Guidance and Codes documents at SM 03 includes garages in its parking typologies. However, I do understand concerns about garages not being used for parking purposes but storage or other uses and I note that the Design Guidance and Codes document emphasises the need for sufficient space to accommodate a modern car.⁵⁶ A modification is therefore made to this criterion.

Modification **MN6** addresses the changes to Policy AL4.

With modifications **MN5** and **MN6**, both Policies AL3 and AL4 will meet the basic conditions by having regard to the NPPF, being in general conformity with strategic policies and especially CS Policies PSP4, CP1 and CP12 and helping to achieve sustainable development.

TRDC has suggested some minor corrections and updates to paragraphs 7.11 and 7.12 of the supporting text and these can be dealt with as part of a final editorial check.

Policy AL5: Environmentally Sustainable Design

This policy supports the Plan's vision and objectives to encourage new buildings to achieve high standards of sustainable design.

In relation to meeting the challenge of climate change, flooding and coastal change, the NPPF states that the planning system should support the transition to a low carbon future.⁵⁷ The planning system should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.⁵⁸

⁵⁴ Design Guidance and Codes, page 71

⁵⁵ Ibid

⁵⁶ Ibid page 61

⁵⁷ NPPF para 161

⁵⁸ Ibid

It continues that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.⁵⁹

The Government introduced national technical standards for housing in 2015. A Written Ministerial Statement (WMS)⁶⁰ explains that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.

That WMS is now effectively moot in this respect following a Government Statement on Planning – Local Energy Efficiency Standards Update.⁶¹ This embeds a general rule of thumb that policies which propose standards or requirements that go beyond current or proposed standards should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. I consider the principle is applicable here.

Having carefully considered the wording of the policy I consider it does not set a standard and therefore is acceptable in principle.

The policy also sets out general parameters for supporting community and renewable energy schemes.

Policy AL5 meets the basic conditions by encouraging new development to meet and take the opportunity to achieve a high level of sustainable design and has regard to national policy, be in general conformity with strategic policies and CS Policies CP1 and CP12 in particular and will help to achieve sustainable development.

Policy AL6: Heritage Assets

The NPPF is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.⁶² It continues that plans should set out a positive strategy for the conservation and enjoyment of the historic environment.⁶³

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes which have heritage significance, but do not meet the criteria for designated heritage assets. PPG advises there are various ways that such assets can be identified including through neighbourhood planning.⁶⁴

However where assets are identified, PPG advises that it is important decisions to identify them are based on sound evidence.⁶⁵ There should be clear and up to date

⁵⁹ NPPF para 162

⁶⁰ Written Ministerial Statement 25 March 2015

⁶¹ Statement made on 13 December 2023

⁶² NPPF para 202

⁶³ Ibid para 203

⁶⁴ PPG para 040 ref id 18a-040-20190723

⁶⁵ Ibid

information accessible to the public which includes information on the criteria used to select assets and information about their location.⁶⁶

The conservation and enhancement of the historic environment is a strategic objective of the CS. CS Policy PSP4 indicates development should be well-designed and inclusive, in keeping and in scale with the location and sensitive to the character of the countryside and local distinctiveness.

CS Policy CP1 seeks to protect and enhance natural, built and historic environments from inappropriate development and improve the diversity of wildlife and habitats. CS Policy CP12 seeks a high standard of design and expects all proposals to have regard to local context and conserve and enhance natural and heritage assets.

DMP Policy DM3 refers to the historic environment. It also refers to important open spaces and other elements of the area's established development pattern and important views in and out of (as well as within) the Conservation Areas.

The Plan area has a number of designated heritage assets including the two Conservation Areas of Abbots Langley and Hunton Bridge, numerous listed buildings and scheduled monuments, one of which is the Grade I listed Church of St Lawrence the Martyr.

Policy AL6 covers designated heritage assets, the Conservation Areas and non-designated heritage assets. To enhance clarity and reflect the relative order of these different elements, as Conservation Areas are designated heritage assets, I consider a change to the order of the policy would be of benefit.

There are also some amendments to the wording to reflect the statutory duty.

The policy seeks to designate a non-designated heritage asset. This is the Holy Well in Bedmond. More information about the Holy Well is given in Appendix F – Non-designated heritage assets. I also requested a larger scale plan of its location as part of my questions of clarification which has duly been provided and should be incorporated into the Plan. I consider the designation have been appropriately identified and supported.

The element of the policy that deals with non-designated heritage assets should be separated out so that if additional non-designated heritage assets are designated in the future, this part of the policy will still apply.

In relation to non-designated heritage assets, the NPPF explains that a balanced judgment will be needed having regard to the scale of any harm or loss and the significance of the heritage asset.⁶⁷ The policy refers to national policy on this and I consider that is acceptable.

⁶⁶ PPG para 040 ref id 18a-040-20190723

⁶⁷ NPPF para 216

Modification **MN7** to the policy addresses these points. With this modification, Policy AL6 will meet the basic conditions by having regard to national policy and guidance, being in general conformity with strategic policies of the development plan and CS Policies PSP4, CP1 and CP12 and DMP Policy DM3 in particular and helping to achieve sustainable development.

Modification **MN8** inserts the location map of the Holy Well.

8. Local Economy

There are three policies in this section. All three aim to support the role of Abbots Langley village centre and the smaller local centres to help sustain them to provide for day to day needs and to fulfill their role as important community meeting places.

CS Policy CP7 identifies Abbots Langley as a District Centre. CS Policy CP7 supports town centres and shopping. I note that in the emerging Local Plan, Abbots Langley continues to be identified as a District Centre.

Policy AL7: Retaining and Enhancing the Vitality and Viability of Local Centres

The heading and policy title on page 51 of the Plan do not match. Modification **MN9** recommends a change to both to better reflect the content of Policy AL7.

The first element of Policy AL7 sets out a number of principles for Abbots Langley Village Centre. It refers to a Village Centre Masterplan that has been produced by AECOM as well as the Design Guidance and Codes. The Village Centre is defined in the Masterplan document.

The Village Centre Masterplan is a comprehensive document that follows the principles of a 20-minute neighbourhood and identifies a number of opportunities for enhancement. The document explains that the key components of the scheme are to promote a distinctive local character that reflects the heritage of the village centre; to retain and create green spaces; to connect community facilities and businesses to increase patronage; and to upgrade connections to the village centre.⁶⁸ It sets out detailed framework proposals for four areas of the central area. These four areas are in front of the library and St Saviours; area next to St Lawrence Church; area in front of the shopping parade; and the Breakspeare Special School site.

The Village Centre Masterplan recognises a number of heritage assets including the Conservation Area, listed buildings and locally important buildings.

Policy AL7 supports residential use on upper floors, certain temporary uses and outside capacity for eating and drinking establishments in principle. It covers the reuse of heritage assets.

⁶⁸ Village Centre Masterplan page 6

I do not share TRDC's concern about criteria C., D. or E.. I consider the wording used in C. means that the Village Centre Masterplan can be taken into account and if there are elements of it which fall outside the remit of planning, then this assessment may encourage positive action to occur. This part of the policy refers to the Village Centre and so D. is applicable to this geographical area. Applicants should be able to demonstrate unused or underused upper floors and housing seems to me to be an acceptable term.

The policy refers to local and neighbourhood centres and resists the loss of local convenience shops. There are seven identified areas referred to in paragraph 8.11 and their catchment areas are shown on Figures 26 – 32 inclusive. I consider it would be clearer if these are named and referred to as "neighbourhoods" and the Figures cross-referenced. Modification **MN10** addresses this point.

Lastly, the policy supports a range of activities in Bedmond Village Centre. Although this is not defined on a map, Figure 26 shows the village facilities.

Overall, I feel the policy would be clearer if some of its subheadings were removed. Modification **MN10** achieves this.

Policy AL7 provides a set of criteria more nuanced than, but leading on from, strategic policy, to the needs of the Village Centre and small local centres. With **MN9** and **MN10**, the policy will meet the basic conditions by having regard to national policy, being in general conformity with development plan policies and particularly CS Policies CP1 and CP7 which considers town centres and shopping and helping to achieve sustainable development.

I take the point TRDC makes about criterion G. and suggest a reference is added to the supporting text. Modification **MN11** addresses this.

Policy AL8: Supporting Recreation and Sustainable Tourism

The Plan recognises that tourism is a sector that can expand in the Plan area which, amongst other attractions, is home to the Warner Brothers Studios and the Grand Union Canal. Policy AL8 supports provision of appropriate tourist attractions including accommodation for visitors.

In supporting a prosperous rural economy, the NPPF states that policies should enable sustainable rural tourism and leisure developments which respect the character of the countryside.⁶⁹ Whilst I note much of the Parish falls within the Green Belt, the NPPF also identifies tourism development as a main town centre use and this includes accommodation. There are no strategic policies that refer specifically to tourism.

With modification **MN12** to ensure the policy refers to the Green Belt and is future proofed, the policy will meet the basic conditions by having regard to national policy

⁶⁹ NPPF para 88

and guidance, being in general conformity with strategic policies and helping to achieve sustainable development.

TRDC has suggested some minor corrections to the policy and updates to paragraphs 8.14 and 8.16 of the supporting text and these can be dealt with as part of a final editorial check.

Policy AL9: A Safe, Attractive and Welcoming Village Centre

Taking on board one of the key recommendations in the Village Centre Masterplan, Policy AL9 supports enhancement of the public realm. It focuses particularly on pedestrian movement, cycling facilities, electric charging points and better signage.

The policy has the potential to support enhancement of the Village Centre making it a more attractive and sustainable destination for residents and visitors alike.

Policy AL9 meets the basic conditions by having regard to national policy and guidance, being in general conformity with CS Policies CP1, CP12 and PSP2 which, amongst other things, seeks to conserve and enhance the local distinctiveness of the historic core of Abbots Langley and helping to achieve sustainable development. No modifications are therefore recommended.

9. Environment

This chapter of the Plan starts by stating that much of the Parish falls within the Green Belt; this is correct. It continues that it is this “greenness” that is highly valued by the local community particularly in relation to a sense of belonging and place. It recognises that the environment can bring numerous benefits for recreation, wellbeing and biodiversity.

My concern about this opening to this chapter is that the policies which follow are about the natural environment. Whilst the Green Belt can form part of that equation, the function of Green Belt is not an environmental one and it is not an environmental designation. I therefore consider some amendment is needed to the opening paragraph. This is subject to **MN13**.

The NPPF requires the planning system to contribute to and enhance the natural and local environment including through the protection of valued landscapes and sites of biodiversity value, recognising the intrinsic character and beauty of the countryside and, minimising impacts on, and providing net gains for, biodiversity.⁷⁰

To protect and enhance biodiversity, the NPPF encourages plans to identify and map and safeguard local wildlife rich habitats and ecological networks, wildlife corridors and promote priority habitats as well as pursuing net gains for biodiversity.⁷¹

⁷⁰ NPPF para 187

⁷¹ Ibid para 192

The NPPF is clear that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.⁷²

The NPPF recognises that planning policies should contribute to, and enhance, the natural and local environment by, amongst other things, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.⁷³

Development that would result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.⁷⁴

CS Policy CP9 refers to green infrastructure recognising the importance of its delivery and a linked network.

DMP Policy DM6 refers to biodiversity, trees, woodlands, watercourses and landscaping. It protects biodiversity sites in line with the hierarchy. New development should seek to retain trees and woodlands and other important landscape and nature conservation features. Landscaping should enhance sites. Where a tree or hedgerow is removed, a replacement is required.

Non-strategic DMP Policy DM7 refers to landscape character.

Policy AL10: Natural Landscape and Environment

Policy AL10 sets out a number of elements to ensure that any new development conserves natural features and where appropriate enhances the natural environment. Whilst the policy adds local detail, modification **MN14** is made to ensure that the wording of the policy is clear and has regard to the NPPF and provides a practical framework for decision making.

In particular a representation from Pegasus Group suggests that the policy is at odds with the NPPF in relation to its stance on replacement trees. Policy AL10 states there should be no loss of trees or woodlands as a result of development whereas Pegasus Group draws my attention to the part of the NPPF which states that existing trees are retained wherever possible.⁷⁵ In my view, this paragraph could be interpreted as referring primarily to street trees in urban environments. Section 15 of the NPPF is clear that the natural environment should be conserved and enhanced and that the intrinsic character and beauty of the countryside and the wider benefits from natural

⁷² NPPF para 136

⁷³ Ibid para 187

⁷⁴ Ibid para 193

⁷⁵ Ibid para 136

capital and ecosystem services and of trees and woodland are recognised.⁷⁶ A similar point has been made by TRDC. The recommended modification addresses this point.

Other representations refer to swifts. The policy does refer to swift boxes. I note that the NPPF supports the incorporation of features that support priority or threatened species such as swifts, bats and hedgehogs.⁷⁷ This is also supported in PPG which highlights swift boxes as being of particular importance as swifts rely on urban cavities for nesting and suggests a general aim of a minimum of one nest box per unit across a development.⁷⁸ Therefore, taking on board the advice from the specialist organisation, modification **MN14** also strengthens the reference to swift boxes in this policy.

With this modification, Policy AL10 will meet the basic conditions by having regard to national policy and guidance, being in general conformity with strategic policies, especially, CS Policies CP1, CP9 and CP12 and DMP Policy DM6, and helping to achieve sustainable development.

TRDC has raised a number of points in relation to the supporting text. Comments relating to paragraphs 9.4 and 9.6 (in respect of the link) and Figure 13 can be undertaken as minor changes as part of a final editorial check.

Changes to paragraphs 9.6, 9.7 and 9.8 which reflect the stance in the NPPF, are recommended via modification **MN15**.

Policy AL11: Green and Blue Infrastructure and Biodiversity Net Gain

This policy supports green and blue infrastructure and seeks biodiversity net gain of 20% where possible. In my view, the policy makes it clear, as does the supporting text, that the 20% figure is aspirational and the minimum 10% is the statutory figure.

Criterion C. of the policy refers to “identified Biodiversity Opportunity Areas”. It was not clear to me what these were or how they had been identified. In response to a query on this matter, the Steering Group explains that these areas would be identified based on the locations mapped in the Local Nature Recovery Strategy for Hertfordshire which has now been published. Given these areas have not been mapped, a modification **MN16** is made to the policy to make it clearer and remove this draft designation.

With modification **MN16**, Policy AL11 will meet the basic conditions by having regard to national policy and guidance, being in general conformity with strategic policies, especially, CS Policies CP1, CP9 and CP12 and DMP Policy DM6, and helping to achieve sustainable development.

I am also advised, in response to a query, that paragraph 9.14 should now be deleted. Modification **MN17** addresses this.

⁷⁶ NPPF para 187

⁷⁷ Ibid

⁷⁸ PPG para 017 ref id 8-017-20250609

TRDC refer to paragraph 9.15 suggesting some amendment, but the wording reflects the NPPF⁷⁹ and so I do not consider any change is necessary.

Policy AL12: Locally Significant Views

This policy identifies 19 views that are of importance to the local community. Although the Plan and Figure 15 repeatedly says it identifies 15 views, View 13 is what is described as a “cluster” of five long-range views. They are in different locations and I therefore regard each one as a separate view.

These views are identified on Figure 15 on page 69 of the Plan. I found this figure time consuming to decipher and suggest that retained views are shown more clearly on a new map. In addition, there are two View 15s on Figure 15, but no View 14. It is clear that the southernmost View 15 should be View 14.

A supporting document, Appendix G – Locally Significant Views and Local Green Spaces has also been produced. This briefly explains how the views have been identified, includes a photograph of each view and a description of its key features.

Some, but not all, of the views are also identified in the Design Guidance and Codes document which refers to key views.⁸⁰ The Design Guidance and Codes identified 12 views, 11 of which are included in Policy AL12. These are Views 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 15. The document recognises that the views include some distinctive buildings as well as landscape features. Views 11, 12, 13 and 14 do not feature. In response to my query on this point, I am informed that these were added after further public consultation.

In addition, Views 1, 2, 3, 4 and 15 are identified in Appendix I, Bedmond.

I considered each of the proposed views shown on Figure 15 at my site visit. For those views I was not able to see, I was able to understand the extent and context of these views. I found many of the precise viewpoints difficult to locate and some of the photographs did not appear to marry with the location of the viewpoints on Figure 15. Whilst, on balance, I consider the assessment has been carried out on a consistent basis with sufficient justification for each view’s inclusion in this policy, deletion of some of the views is recommended because of a lack of clarity.

The views that I recommend deletion of are Views 5 because the description appears to be incorrect and Views 7, 8 and 12, 13a, 13b, 13c, 13d and 15 because of ambiguity in the location of the viewpoint. It is not that these views or views in these vicinities may not be worthy of identification; it is simply that there is too much ambiguity over their presentation.

Turning now to the wording of the policy, I note that it does not seek to prevent development per se; rather it seeks any proposal to take account of the view and to

⁷⁹ refers NPPF para 193

⁸⁰ Design Guidance and Codes, page 24 onwards

mitigate any adverse impact. The Design Guidance and Codes document includes LC02 which sets out general principles about views.⁸¹ I propose amendments to the policy's wording to make it more precise and flexible. Modification **MN18** addresses the deletion of some views and the changes to the policy's wording.

Revisions to Figure 15 are subject to **MN19**.

I acknowledge the concern of, and information submitted from, Pegasus Group. However, many neighbourhood plans up and down the country have identified views that the local community value. The identification of a view with a carefully worded policy that does not prevent development per se but rather ensures new development respects local character features and distinctiveness is, to my mind, precisely one of the issues neighbourhood plans can do well. Whilst I accept the information could be clearer, I consider the modifications to the policy I have recommended will assist to alleviate some concerns.

With these modifications, Policy AL12 will meet the basic conditions by having regard to national policy and guidance, being in general conformity with strategic policies and CS Policies CP1 and CP12 in particular and helping to achieve sustainable development.

The reference to the Appendix number in paragraph 9.23 should be corrected as part of the final editing process.

Policy AL13: Local Green Space

This policy seeks to designate 17 areas of Local Green Space (LGS). They are shown on Figures 16 and 17 on page 72 of the Plan. More information and detailed maps of each proposed LGS is contained in Appendix G - Locally Significant Views and Local Green Spaces of the Plan.

The NPPF explains that LGSs are green areas of particular importance to local communities.⁸² The designation of LGSs should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.⁸³ It is only possible to designate LGSs when a plan is prepared or updated and LGSs should be capable of enduring beyond the end of the plan period.⁸⁴

The NPPF sets out three criteria for green spaces.⁸⁵ These are that the green space should be in reasonably close proximity to the community it serves, be demonstrably special to the local community and hold a particular local significance and be local in character and not be an extensive tract of land. Further guidance about LGSs is given in PPG.

⁸¹ Design Guidance and Codes, page 101

⁸² NPPF para 106

⁸³ Ibid

⁸⁴ Ibid

⁸⁵ Ibid para 107

I saw all the proposed LGSs at my site visit.

1. Primrose Hill playing fields contains allotments and a play area as well as informal recreation. It is designated as open space by TRDC. It is valued for its recreation space and allotments.
2. Longspring Wood Grounds is a Local Wildlife Site valued for its tranquility, wildlife and bluebells.
3. Bedmond playing fields is a designated open space and valued for its recreation.
4. Bell Lane Corner is a small area valued for its beauty; it has seating and mature trees.
5. Manor House grounds is particularly valued for its recreation, but also has historic interest. The detailed map for this area also shows LGS7 which should be removed from this map.
6. Millennium Gardens is a pocket area of green space with planting and seating in the heart of Abbots Langley village. The War Memorial is located here and a flag pole used for special events. There is also the old air raid siren. Whilst this space is small, it is clearly of great importance to the local community.
7. Kitters Green is valued for its tranquility and beauty. It has a number of trees and seating as well as a public house sign.
8. Tanners Wood is valued as a woodland and for its wildlife and recreational opportunity.
9. Hazelwood Lane / Upper Highway (cluster of 7 spaces) add to overall character of the area and seem to me to be integral to design of residential development. The various areas do have a sense of connection. They are particularly valued for their openness, mature trees and informal recreation.
10. Tanners Hill Green is a self-contained, oval shaped area of open space valued for its informal recreation but also forms an integral part of the character of this estate.
11. School Mead Green is designated as open space and valued as a recreational area.
12. Abbots Langley Horses Field is designated open space and consists of informal recreational area and play area.
13. Leavesden Country Park is a larger, but contained and contiguous area of Country Park and designated as open space. It was immensely popular with families at the time of my visit.

14. Leavesden High Road / Aerodrome Way / Halifax Close / Westfield Close cluster is an area of grassed open space with trees. It is designated as open space.
15. South Way playing fields is designated as open space and is a formal recreation ground with picnic areas, play area and pitches.
16. Langleybury cricket ground is valued for its historic associations and recreation.
17. Lower Field Warner Brothers is an area known as Gypsy Lane Ecological Park. It is valued as an ecological area and for the informal recreation opportunities it provides.

Based on the information in the Plan and my site visit, in my view, all of the proposed LGSs meet the criteria in the NPPF satisfactorily. The proposed LGSs are demonstrably important to the local community, are capable of enduring beyond the Plan period, meet the criteria in paragraph 107 of the NPPF and their designation is consistent with the local planning of sustainable development and investment in sufficient homes, jobs and other essential services given other policies in the development plan and this Plan.

However, buildings and areas of hard surfacing such as car parking should be removed from LGS1, LGS3, LGS11, LGS13, LGS15 and LGS16 and the electricity sub station removed from LGS9. In addition, the map for LGS5 also shows LGS7 and to avoid any confusion LGS7 should be removed from the mapping for LGS5. Modification **MN20** addresses the mapping for the LGSs.

Turning now to the wording of the policy, it refers to “sites” and it would be clearer if the word “spaces” was used. The policy designates the LGSs and states that development in the LGSs will be consistent with national policy for Green Belts. It continues with a further sentence that has a sense issue, but is unnecessary in any case. Modification **MN21** therefore amends the policy wording to take account of these two points.

With modifications **MN20** and **MN21**, Policy AL13 will meet the basic conditions.

10. Leisure and Community

There are five policies in this topic section of the Plan.

A particular aspiration of the Plan is to ensure that any housing growth is accompanied by a requisite level of local community services and infrastructure.

The Plan explains that the Parish has benefitted from investment in leisure and community facilities and cites a number of examples including the creation of Leavesden Park and its facilities and the Henderson Hub Arts and Community Centre.

In supporting a prosperous rural economy, the NPPF expects planning policies to enable the retention and development of accessible local services and community facilities

such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.⁸⁶ It also states that policies should guard against the unnecessary loss of valued facilities and services as part of its drive to promote healthy and safe communities, particularly where this would reduce the community's ability to meet day-to-day needs.⁸⁷

The NPPF cites open space and sports venues as part of the local services and community facilities which planning policies should retain and enable.⁸⁸ In addition, the NPPF recognises that planning policies should help to achieve healthy, inclusive and safe places which enable and support healthy lifestyles.⁸⁹ It recognises that access to a network of high quality open spaces and opportunities for sport and physical activity is important for health and wellbeing and can also deliver wider benefits for nature and support efforts to address climate change.⁹⁰ It states that existing open space, sports and recreational buildings and land, including playing fields and formal play areas, should not be built on unless surplus to requirements or replacement by equivalent or better provision in terms of quantity and quality in a suitable location or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.⁹¹

DMP Policy DM11 resists the loss of open spaces, sport and recreation facilities unless certain criteria are fulfilled and supports new provision. Its supporting text specifically includes allotments in its description of open spaces.

DMP Policy DM12 resists the loss of community facilities subject to various criteria including locational, viability, potential other uses and alternative provision considerations. It supports new facilities which should be accessible by sustainable modes of transport.

Policy AL14: Provide, Maintain and Improve Public Facilities for the Community

Policy AL14 supports community facilities that meet the needs of the community. It refers to TRDC's assessments on open space, sport and recreational facilities and sets out criteria for such development. It resists the loss of such facilities unless alternative facilities are provided to the same standard and fully accessible to the community.

The second element of the policy would benefit from some amendment in the interests of clarity and providing a practical framework for decision making. This is achieved in modification **MN22**.

With this modification, Policy AL14 will meet the basic conditions. It will have regard to national policy and guidance, be in general conformity with strategic policies, especially CS Policies PSP2 and CP1 and DMP Policies DM11 and DM12.

⁸⁶ NPPF para 88

⁸⁷ Ibid para 98

⁸⁸ Ibid para 88

⁸⁹ Ibid para 96

⁹⁰ Ibid para 103

⁹¹ Ibid para 104

TRDC has raised a number of points in relation to the supporting text. Comments relating to paragraphs 10.5 and 10.6 can be undertaken as minor changes as part of a final editorial check.

Policy AL15: Allotments and Community Growing Spaces

This policy supports new community growing spaces and resists the loss of existing allotments. The Plan indicates there is a long term waiting list for allotments.

The NPPF refers to allotments as part of its drive to enable and support healthy lives.⁹² Allotments are also regarded as not inappropriate in the Green Belt.⁹³

No modifications are recommended as the policy meets the basic conditions. It has regard to national policy and guidance, is in general conformity with strategic policies of the development plan and especially CS Policy CP1 and DMP Policies DM11 and DM12. It will help to achieve sustainable development.

Policy AL16: Protection of Public Houses

Having lost two public houses in recent years, Policy AL16 seeks to resist the loss of public houses to changes of use unless it can be demonstrated the premises is no longer viable and has been marketed for at least two years. Whilst arguably this is quite a long time, there is support for the policy in the Design Guidance and Codes which refers to public houses representing a social focal point for the local communities and forming part of the character and charm.⁹⁴ It indicates they should be protected and their settings and architectural quality enhanced.⁹⁵

Existing public houses are supported to expand and to develop community-based activities such as restaurants subject to satisfactory effects on nearby residents.

The policy would benefit from some amendment in the interests of clarity and providing a practical framework for decision making. In this respect I have taken on board the amendments that TRDC has suggested. Modification **MN23** is recommended.

With this modification, Policy AL16 will meet the basic conditions by having regard to national policy and guidance, being in general conformity with strategic policies of the development plan and CS Policy CP1 and DMP Policy DM12 in particular, and helping to achieve sustainable development.

⁹² NPPF para 96

⁹³ Ibid para 154

⁹⁴ Design Guidance and Codes, page 89 and RK 01

⁹⁵ Ibid

Policy AL17: Safeguard and Expand Existing Health Services

This policy supports the continued use of health facilities in the Parish. It also supports the expansion or relocation of these services. It refers to a new health centre and supports its development subject to criteria.

There are three health centres in the Parish. One of the health centres, Vine House would like to expand to provide a wider range of services, but still be located centrally in Abbots Langley village. It is this proposal which is specifically supported in the policy. Some preparatory work has been done on this as the Plan refers to a Masterplan that explores what facilities might be needed and two potential sites are mooted. Yet it seems that the expansion of facilities at the existing Vine House is preferred.

The premise of the policy – to ensure that health services for an expanding population are provided in accessible locations for the local community – is supported and in line with the NPPF’s support for the improvement of health, social and cultural wellbeing for all sections of the community.⁹⁶ The second part of the policy is more aspirational, but nonetheless has some basis in the supporting evidence and so can be retained.

The policy has regard to the NPPF. It is in general conformity with strategic policies and especially CS Policy CP1 and DMP Policy DM12. It will help to achieve sustainable development, particularly the social objective which supports accessible services that reflect the needs of communities’ health wellbeing. It therefore meets the basic conditions and no modifications to the policy are recommended.

Policy AL18: Safeguard and Expand Existing Education Provision

Policy AL18 supports the existing education provision subject to a number of criteria that relate to the impact of any proposal. The second part of the policy refers to secondary schools and supports this, again subject to a range of criteria.

The Plan is keen to ensure that schools can serve the local community. There are three secondary schools in the Plan area. The supporting text recognises the importance of early years provision.

This aligns with the NPPF which places importance on the availability of sufficient choice of early years, school and post 16 school places to meet the needs of communities.⁹⁷

The policy meets the basic conditions by having regard to national policy and guidance, being in general conformity with strategic policies of the development plan and CS Policies PSP2 and CP1 and DMP Policy DM12 in particular and helping to achieve sustainable development. The only modification recommended is for a word change to make the policy a little clearer; this is subject to modification **MN24**.

⁹⁶ NPPF para 98

⁹⁷ Ibid para 100

TRDC raises two points in relation to the supporting text. Comments relating to paragraphs 10.30 and 10.31 can be undertaken as minor changes as part of a final editorial check.

11. Transport and Movement

Although largely rural, the Parish is bisected by the M25 and the M1 to its eastern boundary. To the west, is the Grand Union Canal and the West Coast Mainline Railway.

The local community is especially concerned about the impact of new development and an increasing population. Traffic speed and volume are key concerns.

The NPPF indicates that transport issues should be considered from the earliest stages of plan-making and that this includes identifying and pursuing opportunities to promote walking, cycling and public transport use and identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.⁹⁸

The NPPF encourages the provision of well-designed walking and cycling networks with supporting facilities such as secure cycle parking.⁹⁹

The NPPF is clear that planning policies should protect and enhance public rights of way (PROW) and access including taking opportunities to provide better facilities for users for example by adding links to existing rights of way networks including National Trails.¹⁰⁰ Such networks can also help with providing opportunities and options for sustainable transport modes.¹⁰¹ There are also many health and wellbeing benefits of a strong network.

In town centres, the NPPF states that local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.¹⁰²

CS Policy CP10 supports provision for interchange and access by public transport, walking and cycling as particularly important.

Policy AL19: Sustainable Travel

The first part of this policy supports the provision of pedestrian and cycle links to connect with the existing networks to enable choice over transport modes to local destinations such as shops, schools and other facilities. It details a number of considerations based on Sport England's Active Travel Design Guidance.

⁹⁸ NPPF para 109

⁹⁹ Ibid para 111

¹⁰⁰ Ibid para 105

¹⁰¹ Ibid para 109

¹⁰² Ibid para 113

The policy then protects the rural lanes and Roman roads network.

It supports improved walking and cycling access throughout the Parish including in parks and countryside recognising the benefits for health and wellbeing.

Lastly, the policy indicates that financial contributions may be required for new or extended bus routes from strategic developments. However, paragraph 11.19 refers to “major development”. To avoid any potential confusion, I suggest that the term “major development” is used and this accords with the response from the Steering Group in addressing a question of clarification. Modification **MN25** addresses this point.

The Design Guidance and Codes identifies a lack of designated cycle lanes in the Parish.¹⁰³ It also refers to safe, attractive and convenient connections within and between settlements.¹⁰⁴ The safety of active travel improved is also highlighted.¹⁰⁵ SM 02 refers to pedestrian and cycle path connectivity.

Representations indicate that the supporting text should now be updated at paragraph 11.12. Modification **MN26** follows the suggested wording from Hertfordshire County Council and other representations to address this.

The policy itself meets the basic conditions. It has regard to national policy and guidance and is in general conformity with CS Policies CP1 and CP10. It will help to achieve sustainable development.

Policy AL20: Public Parking

Recognising the area has a higher than U.K. average level of car ownership which is not unusual in more rural areas, this policy seeks to retain existing public off-street car parking spaces. It then supports new spaces where that would help to ease congestion for example at schools or transport hubs. Lastly, it supports dedicated cycle facilities and electric vehicle charging points as part of any new provision for public car parking.

In response to a question of clarification, the Steering Group has confirmed that this policy refers to seven publicly owned car parks. A clearer map of the locations of the car parks has been provided. Modification **MN27** makes an amendment to the wording of the policy to refer to these specific car parks and include an appropriately scaled location map.

With this modification, the policy meets the basic conditions. It has regard to national policy and guidance and is in general conformity with CS Policy CP1. It will help to achieve sustainable development.

¹⁰³ Design Guidance Codes page 18

¹⁰⁴ Ibid page 54

¹⁰⁵ Ibid

TRDC raises two issues in relation to the supporting text. Comments relating to paragraphs 11.5 and 11.14 can be undertaken as minor changes as part of a final editorial check.

12. Aspirational Projects

This section details six aspirational projects. I consider the status of these projects is clear and no representations have been submitted that indicate otherwise.

Comments from TRDC relating to paragraphs 12.16, 12.18 and 12.53 can be undertaken as minor changes as part of a final editorial check.

13. Implementation and Review

This section details actions for the Parish Council to ensure that the Plan is delivered, monitored and remains relevant.

Comments from TRDC relating to paragraph 13.1 can be undertaken as a minor change as part of a final editorial check.

14. Infrastructure Improvements and Provision

This section sets out the Parish Council's approach to financial contributions from developers.

15. Policies Maps

It is welcomed that a policies map is included. However, it is very difficult to read and decipher. As a result **MN28** is made to make the policies map clearer. Other changes to the Policies Maps have been recommended throughout this report.

A series of Community Statements and Local Facilities follow the Policy Map. These do not form part of the Policy Map and should have a separate section number and heading or be placed into an appendix. This is also to ensure that the status of this section of the Plan is clearer. Modification **MN29** addresses this point.

Modification **MN30** deals with a matter of factual accuracy in paragraph 15.20.

Comments from TRDC relating to paragraphs 15.6, 15.9, 15.14, 15.16, 15.18 and 15.23 can be undertaken as a minor change as part of a final editorial check. There is also a mistake in the paragraph numbering (16.6 instead of 15.6) to correct.

16. Non-Policy Community Actions

This section refers to community actions. It refers to Table 7 which should be Table 4. This is a minor correction that can be made as part of the final editing process.

17. Glossary

A useful glossary is included.

18. Evidence Base Documents

A list of the evidence base documents is included.

7.0 Conclusions and recommendations

I am satisfied that the Abbots Langley Neighbourhood Plan, subject to the modifications I have recommended in Annex 1, meets the basic conditions and the other statutory requirements outlined earlier in this report.

I am therefore pleased to recommend to Three Rivers District Council that, subject to the modifications proposed in this report, the Abbots Langley Neighbourhood Plan can proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I see no reason to alter or extend the Plan area for the purpose of holding a referendum and no representations have been made that would lead me to reach a different conclusion.

I therefore consider that the Abbots Langley Neighbourhood Plan should proceed to a referendum based on the Neighbourhood Plan area as approved by Three Rivers District Council on 18 November 2014.

Ann Skippers MRTPI

Ann Skippers Planning

10 March 2026

Appendix 1 List of key documents specific to this examination

Abbots Langley Neighbourhood Plan 2025 to 2041 Submission Version Plan May 2025 and Appendices A – I [see below]

Basic Conditions Statement May 2025

Consultation Statement May 2025

Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report February 2023 (Place Services)

Housing Needs Assessment December 2017 (AECOM) [also referred to as Appendix D]

Design Guidance and Codes Final Report November 2021 (AECOM) [Appendix E]

Abbots Langley Village Centre Masterplan Final Report October 2022 (AECOM) [Appendix H]

Bedmond Vision and Aspirations May 2025 [Appendix I]

Abbots Langley Conservation Area Appraisal December 2013 (TRDC)

Hunton Bridge Conservation Area Appraisal July 2008 (TRDC)

Core Strategy adopted 17 October 2011

Development Management Policies Local Development Document adopted July 2013

Site Allocations Local Development Document adopted November 2014

Local Plan 2026 – 2041 Regulation 19 Part 1 January 2026

Local Plan 2026 – 2041 Part II – Site Allocations January 2026

Regulation 19 Part 2: Site Allocation 27/01/2026

List ends

Appendix 2 Questions of clarification from the examiner

Abbots Langley Neighbourhood Plan Examination

Questions of clarification from the Examiner to the Parish Council and TRDC

Having completed my initial review of the Neighbourhood Plan (the Plan), I would be grateful if both Councils (as appropriate) could kindly assist me as appropriate in answering the following questions which either relate to matters of fact or are areas in which I seek clarification or further information. Please do not send or direct me to evidence that is not already publicly available.

1. Please could the PC confirm the dates of the Regulation 14 consultation period?
2. Please could TRDC confirm the strategic policies of relevance to this examination? DMP Policies DM2, DM3, DM6, DM11 and DM12 and SALDD Policies SA2, SA4 and SA5 have previously been advised as being 'strategic' in addition to all the Core Strategy policies.
3. Please could TRDC draw my attention to any relevant aspects of, or implications from, the emerging Local Plan for this [neighbourhood] Plan?
4. A Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report has been submitted. Was the Screening Report subject to the requisite consultation with the statutory bodies? Assuming it was, please forward a copy of their responses to me (or confirm no responses were received). If it was not subject to the required consultation, this may require further action.
5. In relation to the Holy Well in Bedmond referred to in draft **Policy AL6**, please could the proposed asset be identified on a larger scale map so its extent and location is clear.
6. A number of queries arise with regard to draft **Policy AL7**:
 - a. Do criteria A. to H. inclusive only apply to Abbots Langley Village Centre?
 - b. Is Abbots Langley Village Centre referred to in the policy, the same area as defined in the Village Centre Masterplan i.e. the black line area on page 13 and the red line area on page 14?
 - c. Are the local and neighbourhood centres referred to in criterion I. those listed in paragraph 8.11 on page 55 of the Plan?
 - d. Should the local and neighbourhood centres be defined on maps? Are they defined in any plans at TRDC level?
 - e. Is Bedmond Village Centre defined on a map? Is this defined in any plan at TRDC level?
 - f. What is the status and purpose of **Appendix I**? Does it relate to this or any other policy?
7. Draft **Policy AL11** refers to "identified Biodiversity Opportunity Areas". What are these areas? How have they been identified? Do they need to be mapped? If amendments need to be made to the policy, please put forward suggested revised text for consideration.

8. What is the project referred to in **paragraph 9.14**?
9. In relation to draft **Policy AL12** two queries arise:
 - a. Views 11, 12, 13 and 15 do not appear to be identified in the Design Guidance and Codes; is this correct?
 - b. Are any of the views subject of draft Policy AL12, identified in Appendix I?
10. Draft **Policy AL19** refers to “strategic development” in Part E., but paragraph 11.19 refers to “major development”. Please could this be clarified; what sort of development does the policy refer to (strategic or major)?
11. Draft **Policy AL20** refers to public car parks. Is it the intention that this is a general policy or should it refer specifically to the public car parks shown on the Policies Map? If it is the latter, how have these been identified? Have the owners been notified?
12. In relation to **Section 15** of the Plan, there is a Policies Map which is followed by supporting text and other figures. I am not clear on the intention or status of the community statements and how these relate to the rest of the Plan. Please could this be clarified.
13. Please confirm if **paragraph 15.20** which refers to the Lemonfield estate is correct (or not).
14. How does **Section 16** relate to Section 15?
15. Historic England refer to an attachment in the representations document. Please could this be forwarded to me, as I seem to be missing it from the bundle of documents.
16. Please could I be updated about the planning application referred to in the representation from the Pegasus Group on behalf of Taylor Wimpey; has this now been determined?

It may be the case that on receipt of your anticipated assistance on these matters that I may need to ask for further clarification or that further queries will occur as the examination progresses. These queries are raised without prejudice to the outcome of the examination. Where I have invited changes to be suggested, this is entirely without prejudice to my consideration of the issue.

Please note that this list of clarification questions is a public document and that your answers will also be in the public domain. Both my questions and your responses should be placed on the Councils’ websites as appropriate.

With many thanks,
Ann Skippers MRTPI
Independent Examiner
2 February 2026

Annex 1 Schedule of Proposed Modifications

Modification Number	Page number/other reference	Recommended Modification Changes to the wording of the supporting text or policies and any new wording are shown in italics. Please note that paragraph numbers refer to existing paragraph numbers.
MN1	Page 29, Policy AL1	<p>Amend Policy AL1 by:</p> <ul style="list-style-type: none"> • Amending criterion B. i. to read: <p>“it is in accordance with national and Three Rivers <i>development plan</i> policies in respect of appropriate uses...” [retain remainder of sentence as existing]</p> • Amending criterion B. ii. to read: <p>“it does not individually or cumulatively result in <i>the physical or visual coalescence of the individual communities in the Parish, notably Bedmond and Abbots Langley, and retains their separate identities.</i>”</p> • Deleting criterion B. iv. in its entirety • Amending criterion B. v. to read: <p>“where appropriate, it brings redundant or vacant agricultural/farm <i>or other rural buildings or buildings of heritage value</i> back into viable use...” [retain remainder of sentence as existing]</p>
MN2	Page 27, Paragraph 5.4	Update paragraph in line with wording agreed between the Parish Council and TRDC [factual update]
MN3	Page 28, Paragraph 5.10	<p>Add the word “<i>arguably</i>” to the second sentence in the third bullet point in paragraph 5.10 so that it reads:</p> <p>“These <i>arguably</i> have greater potential...”</p>

Modification Number	Page number/other reference	Recommended Modification
MN4	Page 32, Policy AL2	<p>Amend Policy AL2 to read:</p> <p>“A. Other than in development designed to meet an identified specialist housing need, the mix of housing sizes, types, tenures, and affordability in proposed development should, in so far as is reasonably practicable and subject to viability, assist in meeting <i>local needs using the most recently available and up to date housing needs assessment figures.</i></p> <p>As appropriate to their scale, nature, and location, development proposals for residential use should respond positively to <i>all of</i> the following principles:</p> <ul style="list-style-type: none"> i. the delivery of smaller (1-3 habitable rooms) and medium (5 habitable rooms) dwellings <i>or as otherwise set out in the most up to date assessment of local housing needs;</i> ii. the provision of affordable housing which <i>meets</i> the requirements in the Three Rivers <i>development plan</i>. Affordable homes should be tenure-blind and well-integrated with market housing. The tenure of affordable units should meet the specific needs of the parish; iii. proposals that enable greater affordability uplifts and prioritise local residents when it comes to allocating housing (such as the use of social rent or First Homes). <p>B. Residential development that is being built to meet the needs of older people (by virtue of its size and location) should demonstrate how it <i>reflects</i> the Housing our Ageing Population Panel for Innovation (HAPPI) principles, and the guidance contained in the RTPI’s “Dementia and town planning: Creating better environments for people living with dementia”.</p> <p>C. Development proposals for self- and custom build housing will be supported where they otherwise comply with development plan policies. Medium (5 habitable rooms) dwellings will be particularly</p>

Modification Number	Page number/other reference	Recommended Modification
		supported.”
MN5	Page 34, Policy AL3	<p>Amend Policy AL3 by:</p> <ul style="list-style-type: none"> • Amending criterion A. to read: <p style="margin-left: 40px;"><i>“A. Development proposals should conserve or enhance the character or appearance of the Conservation Area in which they are located (as shown on Figure 11) and the Policies Map.</i></p> <p style="margin-left: 40px;"><i>All new development should reflect the character of the Character Area in which they are located (as shown on Figure 12), the Policies Map and as described in the Abbots Langley Design Guidance and Code, Appendix E.). Developments should reflect the architectural variety found locally and use materials that are in keeping with those found in existing buildings in the immediate locality. This will help to avoid building design that is inappropriate to the Plan area. Innovation in design will be supported, where this demonstrably enhances the quality of the built form.”</i></p> • Amend criterion B. ii. to read: <p style="margin-left: 40px;"><i>“take into account and adhere to the Abbots Langley Design Guidance and Codes and, where appropriate, the Conservation Area Appraisals;”</i></p> • Amend criterion C. iii. to read: <p style="margin-left: 40px;"><i>“a layout that clearly minimises the visual impact of buildings of a larger volume, form, scale, size or height relative to the surrounding context and larger than typical structures around it on both the open countryside and existing villagescape to avoid new</i></p>

Modification Number	Page number/other reference	Recommended Modification Changes to the wording of the supporting text or policies and any new wording are shown in italics. Please note that paragraph numbers refer to existing paragraph numbers.
		<i>development dominating its surroundings and to provide a visual transition between new development and existing."</i>
MN6	Page 42, Policy AL4	<p>Amend Policy AL4 by:</p> <ul style="list-style-type: none"> • Amend criterion i. to read: <i>"take into account and adhere to the Abbots Langley Design Guidance and Codes;"</i> • Amend criterion iii. to read: "building height should be considered in terms of how it relates to the surrounding context of the character area within which it is located. Development of three-storeys and above on or adjoining the boundary of sites adjacent to the settlement boundary abutting open countryside <i>will not be supported unless site specific circumstances would result in an acceptable impact;"</i> • Amend criterion viii. to read: <i>"garages should be of a sufficient size to accommodate a modern car and be solely used for parking when included in any parking space standards calculation;"</i>
MN7	Page 48, Policy AL6	<ul style="list-style-type: none"> • Reorder Policy AL6 so that it reads in the following order: A. B. D. C. E. • Separate out the [existing] first and second sentences of element C so that the first part of

Modification Number	Page number/other reference	Recommended Modification
		<p>C designates the Holy Well as a non-designated heritage asset and the second part applies generally to any non-designated heritage assets by creating a new paragraph for each of these separate elements [could leave a line space between the two sentences]</p> <ul style="list-style-type: none"> • Add the words “<i>or appearance</i>” after “character” in [existing] D.ii., D.iii. and D.iv.
MN8	Page 49	Insert larger scale location map of the Holy Well at an appropriate place in the Plan
MN9	Page 51, Section sub-heading	Change the sub-heading and the title of Policy AL7 to: <i>“Retaining and Enhancing the Vitality and Viability of Abbots Langley Village Centre and other local centres”</i>
MN10	Page 51, Policy AL7	<p>Amend Policy AL7 by:</p> <ul style="list-style-type: none"> • Removing the “Upper floor residential”, “Temporary uses”, “Re-use of heritage assets” and “Eating and drinking establishments” subheadings • Changing the subheading “Local and neighbourhood centres” to “Local Neighbourhoods” • Adding a reference after the sub heading “Local Neighbourhoods” and before criterion I. that reads: <i>“Six neighbourhoods are identified [list the six in paragraph 8.11] and their catchment areas and main facilities are shown on Figures 27 – 32.”</i> • Adding a reference after the sub heading “Bedmond Village Centre” and before criterion J. that reads: <i>“Bedmond’s local catchment is shown on Figure 26.”</i>

Modification Number	Page number/other reference	Recommended Modification
MN11	Page 54, Paragraph 8.10	Changes to the wording of the supporting text or policies and any new wording are shown in italics. Please note that paragraph numbers refer to existing paragraph numbers. Add a new paragraph after paragraph 8.10 that refers readers to where a list of non-designated heritage assets can be found with any links as necessary.
MN12	Page 56, Policy AL8	Amend Policy AL8 by: <ul style="list-style-type: none"> <li data-bbox="735 674 1139 703">• Amend criterion A. to read: <p data-bbox="783 752 1394 938">“A. Development proposals for recreational and sustainable tourism activities, including additional visitor accommodation and a Visitor Centre, will be supported <i>in suitable locations</i> where all of the following are met.”</p> <p data-bbox="783 987 1082 1016">[retain existing i. to iv.]</p> <li data-bbox="735 1066 1139 1095">• Amend criterion B. to read: <p data-bbox="783 1144 1382 1368">“B. The signage for visitor attractions and facilities should be clear and further detail is provided in the Place & Movement Planning and Design Guidance for Hertfordshire Part 4, which includes the criteria for brown tourist signs <i>or any successor document.</i>”</p>
MN13	Page 59, Paragraph 9.1	Amend paragraph 9.1 to read: <p data-bbox="687 1496 1394 1794">“The Parish of Abbots Langley falls largely within the Metropolitan Green Belt; one of the few exceptions being Abbots Langley Village. It is this <i>openness and greenness</i> that serves to create a strong sense of belonging and distinctive place among local residents. <i>Access to the natural environment</i> brings multiple benefits – promoting recreation, wellbeing, protecting biodiversity and an attractive place to live and work.”</p>
MN14	Page 59, Policy AL10	Amend Policy AL10 by: <ul style="list-style-type: none"> <li data-bbox="735 1924 1161 1953">• Amend criterion B. i. to read: <p data-bbox="783 2002 1369 2031">“<i>avoided in the first instance, and minimised,</i></p>

Modification Number	Page number/other reference	Recommended Modification
		<p><i>any necessary loss of trees and woodland in the design of any scheme and avoided any damage to existing trees or woodlands during construction or as a result of development.</i></p> <ul style="list-style-type: none"> Amend criterion B. v. to read: <p><i>“v. provide suitable wildlife-friendly features (such as hedgehog holes in new residential fencing, bird and bat nesting boxes, swift boxes and ponds). Swift bricks shall be required on all new developments, with the general aim across a development of a minimum of one nest box per dwelling or for higher rise and non-residential developments, appropriate to the scale and type of proposal. Swift bricks should be installed in accordance with best practice guidance contained in the British Standard for integral nest boxes, BS42021:2022.”</i></p>
MN15	Page 61, Paragraphs 9.6, 9.7 and 9.8	<p>Amend paragraph 9.6 to read:</p> <p><i>“Information and data on local species for the area are available from the Herts Biodiversity Record Centre. These habitats and species have evolved in response to local geology and land use. Some may have taken hundreds of years to establish and ancient woodland and ancient or veteran trees cannot be replaced in any meaningful way.”</i></p> <p>Amend the second sentence of paragraph 9.7 to read: <i>“This should include an appropriate landscape and ecological management plan which includes a list of trees and shrubs to be planted, which should include native species wherever practical.”</i></p> <p>Amend paragraph 9.8 to read:</p> <p><i>“National policy indicates that planning permission should be refused for any development resulting in</i></p>

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MN16	Page 62, Policy AL11	<p>the loss or deterioration of irreplaceable habitats such as <i>ancient woodland or ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.</i>"</p> <p>Amend criterion C. to read:</p> <p><i>"Proposals that support the enhancement and management of Areas of Particular Biodiversity Importance identified in the Local Nature Recovery Strategy will be supported, including linking these to wildlife corridors. Proposals which cause unacceptable harm to such connectivity will not be supported."</i></p>
MN17	Page 64, Paragraph 9.14	Delete paragraph 9.14
MN18	Page 67, Policy AL12	<p>Amend Policy AL12 by:</p> <ul style="list-style-type: none"> • Deleting Views 5, 7, 8, 12, 13a, 13b, 13c, 13d and 15 from the policy • Change the last paragraph of the policy to read: <p><i>"New development should not detract from the key landscape features and other attributes of these views. It should be designed in a way that demonstrates how it has protected longer distance views out into the countryside by maintaining visual connections into the surrounding landscape."</i></p>
MN19	Page 69, Figure 15	Show the retained views subject of Policy AL12 more clearly on a new Figure 15
MN20	Local Green Spaces mapping	<ul style="list-style-type: none"> • Delete areas of hard standing and car parking and buildings from Local Green Spaces LGS1, LGS3, LGS11, LGS13, LGS15 and LGS16 and the electricity sub station removed from LGS9

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		<ul style="list-style-type: none"> Remove LGS7 from the map for LGS5
MN21	Page 70, Policy AL13	<ul style="list-style-type: none"> Change the word “sites” in the first sentence of Policy AL13 to “<i>spaces</i>” Delete the sentence at the end of Policy AL13 that reads: “; proposals for development on Local Green Spaces will not be supported unless they conform to with national policy guidelines.”
MN22	Page 76, Policy AL14	<p>Amend criterion B. of Policy AL14 to read:</p> <p>“Proposals that would result in the loss of community and leisure facilities will only be supported if alternative facilities <i>of an equivalent or better standard are available or provided in an accessible location to the local community.</i>”</p>
MN23	Page 81, Policy AL16	<ul style="list-style-type: none"> Correct the word “licences” in criterion A. of Policy AL16 to “<i>licensed</i>” Amend criterion B. to read: “Proposals for the expansion of existing public houses (Use Class sui generis) in the Parish to <i>support business diversification which would improve the viability of the public house, with particular support given to</i> appropriate community-based activities, such as a restaurant, will be supported, subject to there being no adverse effect on the amenity of residential properties in the locality.”
MN24	Page 84, Policy AL18	Replace the word “recommended” in the first sentence of criterion B. with “ <i>made</i> ”
MN25	Page 87, Policy AL19	Replace the words “...strategic-scale development...” in criterion E. with “ <i>major</i> development...”

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MN26	Page 89, Paragraph 11.12	<p>Update paragraph 11.12 to read:</p> <p><i>“Figure 23 shows the proposed strategic and local cycle routes for the parish of Abbots Langley. The District Council state that they have ‘developed and promoted its Cycling Strategy since 1981 with visible success in creating and improving the cycle routes.’ Examples include the Grand Union Canal towpath which provides a nearly traffic-free route that connects Croxley Green, western Watford, Hunton Bridge, Kings Langley and Nash Mills with 5 miles of wider, level, surfaced and well-signed paths. This links to the South Way Cycleway which connects the improved towpath with Abbots Langley, Leavesden and into Garston on a nearly traffic-free shared footway and bridleway. The TRDC Local Cycling and Walking Infrastructure Plan (LCWIP) has now been formally adopted (July 2025), following public consultation held in mid-2023. This has identified 5 priority routes across the district to develop and improve for the future. The LCWIP may be reviewed and updated in the future. More information can be found at Three Rivers Local Cycling and Walking Infrastructure Plan.”</i></p>
MN27	Page 93, Policy AL20	<ul style="list-style-type: none"> • Amend criterion A. to read: <p style="margin-left: 40px;"><i>“A. Development proposals that would result in the loss of publicly available off-street parking spaces at the public car parks identified on Figure XX will not be supported.”</i></p> • Insert the map of the location of the seven car parks submitted in response to the questions of clarification alongside Policy AL20 and identify the seven car parks on the Policies Maps
MN28	Page 110, Policies Map	Include clearer Policies Map(s)

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MN29	Page 111 onwards	Changes to the wording of the supporting text or policies and any new wording are shown in italics. Please note that paragraph numbers refer to existing paragraph numbers. Add a new section number and title for the “Community Statements and Local Facilities” element including Figures 25 – 32 (or place into an appendix) making it clear what the status of these are i.e. aspirational
MN30	Page 122, Paragraph 15.20	Amend paragraph 15.20 to read: “This area consists of a number of local housing estates located between the A405 dual carriageway and the M1 motorway on the eastern boundary of the parish. These include <i>housing</i> estates such as Lemonfield Drive (<i>1960s</i>) and Coates Way (<i>1950s</i>) and more recent estates such as the Tudor Manor (late <i>1980s</i>). Bucknalls Lane was developed for housing from <i>1930s</i> to <i>1950s</i> ...” [retain remainder of paragraph as existing]

List Ends