

## **Croxley Green Residents' Association**

### **Croxley Green RA Peoples Plan - a Planning and Transport Policy**

#### **CGRA People's Plan**

##### **Introduction**

This is a plan that the Residents' Association "CGRA" has drafted to guide us in our aim to hold local authorities, central government and other stakeholders to account as we fulfill our remit to act in the best interests of those who live, work and / or play in Croxley Green in ensuring our community grows and flourishes in a sustainable manner. We understand other Residents' Associations in the District have, or are, drawing up similar plans for their communities. In fact, the inspiration for this plan is the Plan developed by Maple Cross Residents' Association which can be viewed at [www.maplecrossandwesthydera.com](http://www.maplecrossandwesthydera.com)

Our district borders Greater London and is bisected by the M25. The district comprises 76% of Green Belt which is the major factor in preventing the unrestricted sprawl from Greater London and Watford as well the sprawl of built up areas within the district. There is a balance to be maintained in order to ensure growth is sustainable and the primary factors include, but are not limited to the provision of: housing and commercial buildings (according to recognised need); adequate, supporting infrastructure elements; amenity provision; fulfillment of Green Belt requirements and; climate change.

We have chosen to keep Planning and Transport / Pollution together within this Plan because of the clear linkage between these major aspects, all of which are within the remit, within varying degrees of authority, of Central government, County and District Councils.

In order to undertake this accountability role clearly and efficiently we will constantly refer to this document in our strategy making. This document will be subject to ongoing review to ensure it is relevant to changes in legislation.

## A) Planning

### Relevant Council duties:

**Context:** Of all the powers held by the local district council, Planning has the biggest effect on daily life and on how the area changes over time. A local authority with strong leadership and a clear vision for the community can (with accomplished, dedicated staff) make a huge positive impact. With a lack of vision a local authority can scar an area for generations.

In short, Central Government allows a local council to control how an area develops. They do have to meet certain central targets, such as house building numbers and amount of new development, but otherwise it's pretty much up to them. What gets built, where it is built, by who, to what standards, and under what circumstances - all depends on Three Rivers District Council "TRDC" policy.

In the best performing districts, authorities, such as Bristol and Cherwell, have used their powers to ensure that development happens in the right places, is sustainable in reality (not just in brochures), and serves the people who live there. In many cases Councils have used the powers they have been given to purchase land themselves and work in partnership with private companies to make sure that the developments literally profit the community by raising money for local services which, in turn, directly reduces council taxes.

With some of the highest land prices in the UK, TRDC is not only in the best position to benefit from such programmes here, but is legally allowed to set higher minimum standards than anywhere else.

This is what we are asking TRDC to do going forward:

- Ensure TRDC leadership takes responsibility for ensuring there is a clear vision for the district, a vision that guides Council officers and councillors and is clearly communicated to the electorate.
- Adopt policy along the lines of The People Plan.
- Allocate the necessary resources and energise personnel to roll out similar schemes here in Three Rivers District and follow the set of simple principles laid out in this policy without exception.
- Deliver on ironclad policies that it formulates for the district because the upcoming changes to UK planning law may mean that local residents (and maybe even local councils) will no longer be able to oppose development that has been laid out in the local plan (for new housing and commercial development for the next 15 year period).

**In plain english:** We can't control central government or the housing targets they impose on the area but we do demand that TRDC meets those targets and manages local development so that new development in TRDC is:

### a) Genuinely sustainable:

1. Net zero carbon by 2025.

2. Net carbon negative by 2035.
3. Meets current global best practice (as per the World Green Building Council requirements) not minimum standards.
4. Subject to Construction of Buildings policy - set a high bar for minimum applicable standards.
5. Subject to Council policies that are reviewed and updated in unison with all other pertinent council policies.

**b) Suited to the needs of the area:**

1. Meets the current and future (to 2035) demographic needs of the area in terms of property size, flats/houses/commercial mix.
2. Has specifically defined affordability guarantees built in to the Local Plan.
3. Includes commercial development that meets the current and future needs of local businesses and the community.

**c) Community led and profitable to the community:**

1. Emphasis on community engagement from the inception of creating a new Plan for the district and not via a minimum standard "consultation" that is seen by a handful of people. Use of technology and social media to reach out to every household and let everyone in Three Rivers know what is happening and ask them what they want to see. Agree on a minimum level of community response (say 25%) that demonstrates that TRDC has got the backing of the community.
2. No more government driven development without TRDC as a development partner.

**d) Protective of our remaining green belt and agricultural land:**

1. Strictly control development in open countryside: prioritise development that extends and upgrades existing settlements (within reason).
2. Plan for the long term: in 20 years the few areas of accessible green space left will have immense value to the community.
3. Produce and enforce a Building Construction policy based on high minimum standards.

The above requires emphasis on concise, realistic policies with measurable, attainable targets in order that TRDC can regularly update the community it serves on the progress it is making in fulfilling its duties.

**Actions:**

**1) All development must be to the highest sustainability standard it's legally possible to require: envelope, insulation, air handling, grey water use etc.**

The higher the land value, the higher you can go. TRDC has extremely high land values. TRDC must set and publish standards for consultation ahead of Local Plan sign off.

**2) All development must include REALISTIC non car-based access options for at least 50% of users (residential and commercial).**

Carrots before sticks! We don't choose to drive: we have no choices! We need SAFE, WELL MAINTAINED cycle access that is usable all year round. It means real life bus routes, and it means footpaths.

**3) All residential developments must include at least 30% affordable housing.**

As defined by UK homelessness charities / best practice: not by the developer. We want to see a reversal of the trends of having our children priced out of the area, and of fields being filled with poor quality, high priced new builds.

**4) Stop selling out our area for profits we never see!**

The government has given Councils extensive powers to manage and engage in development. TRDC has the power(s) to manage development itself or in partnership with a developer, keeping profits in house, improving standards AND making money to improve the area / reduce council tax. TRDC has refused because it "*doesn't have enough money*"....but what it actually lacks is vision to follow the lead of other local authorities doing development *for* their residents, not *to* them.

**5) Stop building on the green belt by default.**

Our remaining fields and woods are the reason the area has wider appeal to the high income areas, and provides residents with a highly sought after sense of well being. They're literally the heart of the area and a huge source of property value. Stop building on it wherever possible. Yes, the government set housing policy - and TRDC can't ignore it, BUT, the housing target is there for negotiation because of the constraints faced by our district (and neighbouring districts), notably, the percentage of Green Belt contained within the District and local need for housing. Members of the Joint Three Rivers Residents' Association have already identified extensive brownfield sites that TRDC have overlooked....they must be used first!

## **B) Transport**

### **Relevant Council duties:**

**National Planning Policy Framework "NPPF":** Promoting sustainable transport. Meeting the challenge of climate change and flooding.

**Health and Social Care Act 2012:** Duty to improve public health.

### **Context:**

#### **Air pollution:**

- 1,793 GB road traffic fatalities in 2017: twenty times less than air pollution.
- The UK attributes between 28K and 36,000 deaths PA to long-term exposure.
- Herts: 80 residents died from air pollution and 20 on the roads in 2017.
- Road casualties decreased by 16% in 2017. Pollution death rates are rising.
- No current monitoring of the most dangerous \*particulate matter size (PM2.5) in TRDC.
- Nearly half of emissions in Three Rivers derive from M25 traffic.
- Combating the above will also alleviate environmental noise pollution.

#### **Why is urgent action required now?**

1. There is a recognised Climate Change emergency with a fast approaching irreversible tipping point.
2. There is evidence that the human impact of air and nano plastic pollution is growing weekly.
3. Inaction is now a more expensive option than action in the mid to long term.
4. Councils have a responsibility to effectively plan and operate on significant timescales: if we don't act radically, now, residents' children will live to see significant areas of the UK underwater. This is a uniquely serious situation and requires an order of magnitude improvement from TRDC.

#### **Transport and access:**

- Three Rivers is poorly served by public transport - which increases traffic.
- Three Rivers has few localised services and amenities - which increases traffic.
- Three Rivers has dissuasively dangerous and poorly maintained foot and bicycle access -which increases traffic and reduces exercise opportunities.
- Local congestion is often extreme, and is exacerbated by uncontrolled M25 offlow.
- Heavy Goods Vehicles use Village roads instead of major roads to access M25/M1 and industrial areas
- Transport requires better policing within Three Rivers.

This is what we are asking TRDC to do going forward:

- Adopt policy along the lines of The CGRA People Plan.
- Allocate the necessary resources and energise personnel to roll out the necessary schemes here in Three Rivers District and follow the set of simple principles laid out in this policy without exception.

- Deliver on ironclad policies that it formulates for the district.

**In plain English:** How do we improve access *and* reduce pollution in *practical* ways?

This is what we are asking TRDC to do going forward:

**NB:** All points here are *practical*, meaning: *cost negative, neutral or minimal*.

**Quick Wins:** (within 6 months):

### **1-Prioritize fluidity:**

Reduce speed.

Lowering the speed on the Motorway produces less pollution and noise and uses less fuel.

20mph residential areas (20s Plenty Campaign)

Low traffic neighbourhoods

Introduce Quiet Lanes where appropriate

- When vehicles brake and accelerate, more dangerous particulate pollution (fine dust) is created than when the same traffic is fluid (brakes and tyres will account for 10% of UK PM2.5 pollution by 2030\*).
- Accelerating a vehicle is *hugely* less fuel efficient than maintaining a steady speed.
- TRDC directly controls the majority of environmental fluidity variables: traffic calming, traffic lights, on street parking and development of new trip generators.

Improving traffic flow *whilst discouraging through-trips* is the most effective cost neutral strategy for reducing traffic generated air pollution in TRDC, and it relies on factors *that TRDC itself controls*. So, it should be at the heart of TRDC policy.

### **Actions:**

**1.1 Roundabouts not traffic lights:** The choice to use traffic lights raises pollution levels in adjacent homes and further afield\*. Planning should always insist on roundabouts and retrofit key locations :

- Roundabouts are proven to be more efficient at moving traffic than traffic lights.
- Roundabouts do not require expensive maintenance contracts / computers (see 1.2).
- Roundabouts can work *with* pedestrian crossing lights for the best of both worlds.

**1.2 Effective contract management or smart traffic resources:** Traffic lights that *can't* be converted to roundabouts must have *effective* sensor control. Ringway, the contractor we pay to maintain the lights, says *all* TRDC traffic light sensors have faulty control software which defaults to regular stop/start cycles regardless of traffic conditions\*\*.

TRDC must ensure that services recharged to it (primarily by Herts CC) are effectively managed or take steps to directly recover funds and to take over management of critical infrastructure.

### **1.3 Ban parking on key choke points in roads with regular tailbacks**

**1.4 Stop spending on traffic management that doesn't work**, or worse, creates positive feedback loops: no more partial "island" speed bumps. The design costs money, damages cars, causes conservative drivers to lose fluidity, and *does not prevent speeding*: the faster you go the less impact they have. Use full width *speed tuned* bumps engineered to

create negative feedback: conservative drivers find they can go safely and smoothly at normal speed, but if a dangerous driver exceeds the tuned speed, they cannot drive unimpeded. The faster you go the worse it gets. In short: slow drivers can drive smoothly reducing local pollution, and fast drivers *have* to slow down.

**1.5 Measure and collate data on traffic flow and type.** The district is full of cameras and sensors. Use that to improve flow and reduce through trips in measurable ways and assign a champion / team to take responsibility and co-ordinate action on traffic in TRDC. Start following incidents and solutions through to completion e.g the situation in 1.2. Without data on what happens in Three Rivers, TRDC is powerless and blind. We need data to drive decisions and policy, and to support lobbying on regional and national stages. At the moment TRDC is officially asking the public to do surveys to prove that traffic exists and that air pollution requires monitoring. This is a perverse situation which must end now.

## **2- Improve access and reduce pollution in practical ways.**

**Quick Wins:** (within 6 months)

### **2) Eliminate unnecessary fuel burning:**

By definition, unnecessary fuel burn is wasteful, costly, and harmful.

#### **Actions:**

**2.1) Ban all unnecessary vehicle idling by all council staff and contractors.** Publicise widely.

**2.2) Monitor and publicly report on compliance.**

**2.3) Find and deploy a *self funding* vehicle idling enforcement contractor / Officer** to strategic locations preceded and initially accompanied by awareness raising.

**2.4) Work with local Schools/businesses that generate significant idling pollution** to enforce on location (e.g. supermarkets, School buses outside schools, Courier deliveries (this has grown significantly since the start of the COVID pandemic).

**2.5) Take immediate action (monitoring and enforcement) to ensure Herts CC staff comply with the law** whilst in TRDC. Herts CC contractors are clearly identified repeat offenders and Herts. CC is on record as having no policy enforcement or monitoring in place.

### **3) Make alternative transport options safer and more attractive:**

Bus Network needs improving especially East/West connections. More accessible, reliable, cheaper, more frequent. Needs to be improved in rural areas. Better connectivity with rail stations.

Cars: Electric cars, more charging points. Car Pools/Car Share companies as in London to reduce car ownership and parking issues.

Reducing car dependency – change of culture.

Low traffic neighbourhoods. Changing culture so that people don't expect to park outside their houses but in designated spaces.

Walking. Maintaining footpaths, cutting vegetation away from pavements. Connecting footpaths to make an integrated network

Promote walking. CPRE evidence base for Nature and health/wellbeing. Promote awareness of the Countryside Code.

For many, riding a bicycle, for example, to and from the train station, is a terrifying and hazardous experience.

A-road routes and other primary roads and B roads are poorly managed and overparked with deep holes and wide grates in the carriageway. Bike lanes are parked on 24/7 and peter out during the most dangerous sections of routes. It is scary for expert cyclists and highly inappropriate for children. Safe bike routes and free, secure storage at both ends of routes. More cycle loan schemes and cycle hubs?

Speed of traffic on roads.

Flooding. Poor drainage management. Mud on lanes. Need natural flood defences, ditches and hedges)

Road surface maintenance is chosen for economy and dangerous for cyclists (e.g. gravel).

Puddles – cyclists can't tell if deep or not

This leaves most local residents with almost no sustainable transport options for access to local services and public transport outside of a very long walk.

#### **Actions:**

**3.1) We invite our ward Cllrs and our TRDC leader to ride routes in our wards on a normal weekday morning or late afternoon** to gain better understanding of the experience that residents have when cycling.

**3.2) Prioritise pothole repair, road surface maintenance storm drain clearance when it affects cyclists and cycle paths.** Potholes are an inconvenience in a car. 15cm deep holes in a road apron are a severe hazard for cyclists who risk crashing or swerving into traffic.

Invite TRDC Cllrs to take the bus to work for a week.

Invite TRDC Cllrs to walk to work where feasible or to walk some of their local footpaths and write a report on their experiences.

Maintain pavements, footpaths and cycle paths (cut back vegetation). Speak to Bus Operators and others e.g businesses/charities to explore options for more accessible, flexible bus network.

Looking at area/District wide infrastructure to make it more integrated e.g.North London/Herts border.

### **3 Improving access and reducing pollution in practical ways**

**Mid Term wins:** (within 1 year):

Policy and Practice - Challenge:

**Root cause analysis and data capture:** what can we control or affect?

1. Traffic levels (Data to be captured: trips p/a, pollution levels inc PM10 and 2.5\*\*)
2. Type of vehicle (Data to be captured: car/truck/ petrol/diesel/age)
3. Driving conditions and behaviour (Data to be captured: congested hours p/a)
4. Identify and implement traffic and pollution monitoring framework to assess current levels and track progress / policy outcomes: trips p/a, pollution levels inc PM10 and PM2.5, congested hours p/a on worst affected / most sensitive roads (eg by schools, healthcare, residential).

## Further pollution related factors that TRDC already controls:

1. Planning ESP: trip generators.
2. Local pathways.

Also: what *could* TRDC control?

## Internal challenge: (evaluation and implementation):

1. Identify and implement quick wins (collaboratively).
2. Put champions in place with aggressive cross departmental quick win targets.
3. Crosslink with other departments: balance planning policy to ensure new multiple trip generators have fluid access, and offer measurable direct benefits to residents.
4. Look for best policy and practice, evaluate and adopt.
5. Look for and secure external funding.
6. Include securing external funding as an Officer KPI where applicable.
7. Act from now on in areas where impact is calculable: eg: measuring PM2.5 presents several technical challenges. However, we already know how much pollution individual cars generate. We know how much fuel is burned at HS2 and other works in TRDC. It is already possible to evaluate the emissions we generate. We want that level to go down over time. We don't need more evidence to determine that less air pollution and less traffic is better. We know that we all need to be making less car trips and walking more. So, let's start implementing policy now on the areas that we do control: Don't wait to be told to do better, and don't wait for Herts CC.  
Coordinate - but don't wait to be led in an emergency.

## Long Term wins: (within 2 years):

### Policy and Practice - Challenge:

Overall, we need to create a culture of excellence and innovation at TRDC that puts it amongst the leading local Authorities in the UK. Internal performance indicators may show that current culture is performance driven, but in reality, manifestly, residents are having to drive policy change and performance improvements at TRDC. This cannot continue long term: not least because it is cripplingly inefficient: officers are supposed to be experts to whom citizens delegate areas of management via Councillors, policy and national legislation. At the moment that chain is broken. We need TRDC to inspire and educate us, not vice versa. Local Authority Officers should be leading the way to order of magnitude improvements in council performance (and finding the income to enable them), yet TRDC doesn't even have its own targets for river or air pollution for example, despite being literally named after our incredibly, globally rare and significant chalk streams (<200 on earth).

We need meaningful consultation and to work collaboratively, co-productively and use shared decision making.

### Actions:

Continue to develop and improve previous initiatives, and to seek new and more effective ways to reduce pollution, increase wellbeing and health outcomes, and do so in an economically viable way.

Examples:

1. Develop a concept similar to 'Bristol Green Capital' which links local food production capabilities to the local population to avoid excessive food miles. Ensure all council offices only use food and produce which has been produced locally to avoid food miles. Lead from the front.

As part of the process of adapting to more sustainable living and climate change, the concept of 'the 20- minute neighbourhood' is recommended. This is all about living locally, giving people the ability to meet most of their daily needs within a 20-minute walk from home, with safe cycling and local transport options.

2. Expand comprehensive measurement of air pollution across the district. Enable all residents to access 'real time' data via a Council App. Start a forum which would enable residents to contribute ideas on how to reduce pollution with a 'rapid response and concrete action' approach from the council.

3. Seek out and secure grant funding / partnership project with a UK hydrogen fuel cell or Electric Vehicle provider (eg Shell) and start delivering a transition plan for TRDC fleet. Do not wait for Herts. CC, demonstrably a poor performer on environment, to lead.

4. Continue to link these initiatives tightly to planning (see planning policy for details) and ensure existing resources are optimised before approving more trip generators.

#### **\*Why do we need PM2.5 measurement?**

1. PM2.5 is the most harmful part of the PM spectrum (particles of all sizes 2.5 micrometers across or smaller - that's two and a half thousandths of millimetre).

2. TRDC does not measure PM2.5 levels. At all.

3. It relies on 2015 Government estimates, which currently project that we should be below max threshold levels, on average, if assumptions hold.

4. The levels that TRDC currently describes as "below max" are in fact, *according to all reputable science*, very harmful to human health.

5. The UK threshold is set higher than Scotland for example as we already have more polluted air: it is not a guide to safety. It has simply been set near current levels to reduce "breaches". All levels are harmful. We have simply raised the level we call "max" in South East England.

6. So, TRDC residents are surrounded by dangerous levels of particulate pollution and TRDC does not measure these levels. This means that:

6.1: TRDC does not *know* what local PM2.5 levels are. Neither does anyone.

6.2: TRDC does not monitor fuel burn (CO2 contribution) or harmful emissions including dangerous PM scale silicate dust from activity it authorises or is subject to (eg HS2 works, gravel extraction etc).

6.3: TRDC cannot make fact-based decisions on this matter: it cannot show that we are safe despite HS2. It cannot show that we are being harmed, or protect us if indeed that is the case. It cannot refuse harmful development on pollution grounds. It cannot even properly evaluate IF development IS harmful.

6.4: So TRDC cannot apply for grant funding, or use local pollution to fight its or residents cases, or to lobby central government, or Herts CC, or anyone.