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## **Local Plan Sub-Committee MINUTES**

**Of a meeting held in the Penn Chamber, Three Rivers House, Rickmansworth, on Tuesday, 4 February 2025 from 7.00 - 8.58 pm**

**Present:** Councillors Stephen Giles-Medhurst Councillor Louise Price, Christopher Alley, Oliver Cooper, Stephen Cox, Steve Drury, Vicky Edwards, Philip Hearn, Chris Mitchell, Sarah Nelmes and Andrew Scarth

**Officers in Attendance:**

Michael Davey, Planning Officer (Policy)  
Aaron Roberts, Senior Planning Officer  
Marko Kalik, Head of Planning Policy and Conservation  
Emma Lund, Senior Committee Officer

**External in Attendance:**

Councillor Narinder Sian, Councillor Jon Tankard and Jon Bishop (Three Rivers Joint Residents' Association)

**LPSC49/25 APOLOGIES FOR ABSENCE**

There were no apologies for absence.

**LPSC50/25 MINUTES**

The minutes of the meeting held on 17 October 2024 were confirmed as a correct record and signed by the Chair.

**LPSC51/25 NOTICE OF OTHER BUSINESS**

There was none.

**LPSC52/25 DECLARATION OF INTERESTS**

There were no declarations of interest.

**LPSC53/25 LOCAL PLAN PROGRESS REPORT**

The Head of Planning Policy and Conservation presented a report which set out the work stages which had been completed, next steps, and work required on the Local Plan in preparation for a Regulation 19 Consultation in November 2025.

The sub-committee noted that the new NPPF had been released in December 2024, and that the Regulation 19 draft Plan would therefore need to be prepared against that document. The required updates to the Local Housing Needs Assessment and the Economic Study had been completed and were summarised in topic papers later on the agenda.

The Head of Planning Policy and Conservation summarised the following key points:

- The Plan was required to cover a period of 15 years from adoption, starting with the current year. As adoption was expected in 2026, the Plan would cover the period 2025 - 2041 (i.e. a period of 16 years) which resulted in a total of 13,312 dwellings across the plan period using the new standard method target of 832 dwellings per annum. When existing commitments such as planning permissions and a windfall allowance were factored in, this figure fell to c.11,500 dwellings. This represented the approximate number of new homes which would need to be planned for prior to taking the Green Belt into consideration.
- The Green Belt Review would help to assess which areas of the District now fell under the new definition of 'Grey Belt' and whether the development proposed in the plan would fundamentally undermine the remaining Green Belt. The Government had advised that it would shortly be publishing updated Planning Practice Guidance on the Green Belt. This was expected to include a new Green Belt review methodology and a standard approach. The Government had stated that this would be released by the end of January; however, it was still awaited at the current time and the Green Belt review was unable to proceed until the new methodology was known. Once it became available a tender process could be finalised in order to select consultants to work on the review. Officers confirmed that funding had been applied for to cover the costs associated with this work. The Head of Planning Policy and Conservation highlighted that the Green Belt Review was an important piece of evidence work not just because of the potential policy and site assessment implications, but also because it needed to be completed before officers could judge the level of growth which might be accommodated within the District. The latter would help to inform the potential for removing sites based on their impact on the remaining or wider Green Belt. This in turn would have an impact on further evidence work and thus may also affect the timeline for the production of the draft Plan.
- Officers were working on putting together a draft list of sites in anticipation of the need for this to help inform the Green Belt review work. A Call for Sites was currently being undertaken, asking for developers and landowners to come forward with any potential new sites not previously considered. Brownfield sites were preferred but greenfield, Green Belt and employment sites would also be considered as there was a chance that those sites, even if located in the Green Belt, may prove preferable to an existing identified Green Belt site. It was important for all of the available options to be able to be considered. Any new sites would be assessed through the Strategic Housing and Employment Land Availability Assessment. Together with a review of previously submitted sites, a list of draft sites would then be produced. The Urban Capacity Study was also being updated as part of the search for brownfield sites, and all of the site review work would be undertaken in-house by officers.
- The Gypsy and Traveller Accommodation Assessment was being finalised. C. 47 pitches would be needed, and it was expected that these would be found by looking at a combination of expanding existing Gypsy and Traveller sites and potentially finding some new sites.
- Work was being done with Sport England to finalise the tender for the Open Space, Sport and Recreation studies. These studies could take up to 12 months to complete; however, officers had seen examples of shorter timelines and the tender process should reveal whether faster production would be possible. If timescales required, it was possible that this work could form part of a Supplementary Planning Document rather than delaying Plan production.
- The Infrastructure Delivery Plan, Integrated Impact Assessment, Whole Plan Viability, Transport Assessment and Strategic Flood Risk Assessment would rely on the proposed level of growth having been identified, and sites and policies having been agreed. It would therefore also require the Green Belt Review to have been completed, although

baseline work could be undertaken in preparation in order to help compress the timeline. These workstreams would all be undertaken by external consultants and could be done in tandem as none had any impact on the others save for potential cross-feeding of data. Data from these studies would be used to inform final decision making on sites and policies, alongside Sustainability Appraisal work. The Sustainability Appraisal was required to be used as part of decision making and would also be consulted on alongside the Regulation 19 draft Plan.

- The Head of Planning Policy and Conservation highlighted that the timescale for the production of the draft Plan was very tight for all aspects of the work. Therefore overlap and evidence work created a risk in terms of potential slippage. However, officers were taking all steps possible to ensure that the work was completed as smoothly as possible.

Officers responded to questions arising from the report and the following points were raised:

- Officers had been asked to review any brownfield sites which had previously been submitted but which had been ruled out as unsuitable, and also to review the housing numbers on all of the existing sites to check that these were not now lower than previously anticipated.
- Once the updated Planning Practice Guidance on the Green Belt had been received, the tender process to appoint a consultant was expected to take c. 4 weeks. It would then take a further c. 2 months for usable data to become available, depending on the methodology requirements.
- It was suggested that, in light of the higher level of housing need which was required to be met a Regulation 18 consultation should be undertaken, particularly as substantively different housing numbers may be sought for existing identified sites and new sites would be proposed. It was questioned whether additional legal advice on the need for a Regulation 18 consultation was required. Officers responded that informal discussions with legal advisers had indicated that where there was no substantive change to the overall growth strategy, and where there were only a few new sites, a Regulation 18 consultation was not required. Additionally, a Regulation 18 consultation had previously been carried out on a much higher growth number. It was noted that a Regulation 18 consultation (which required a consultation period of at least 6 weeks) would jeopardise the tight timescale for delivery of the Plan. However, if a significant new individual site were proposed which had not been consulted on in any of the three previous Regulation 18 consultations, then a consultation would likely need to be undertaken in relation to that individual site. Alternatively, an additional sites consultation could be undertaken. It was suggested that this issue be revisited at the March meeting, once the Call for Sites process had ended and the viable proposed sites were known. In the meantime the Chair undertook to discuss with officers the procurement of more formal legal advice on the need for Regulation 18 consultation.
- Questions were raised in relation to the feasibility of the timescale for the delivery of the Plan, given that only 8 months remained until October when a Regulation 19 draft Plan was expected to be considered by Council. In response it was acknowledged that the timescale was ambitious, but noted that it had been agreed by Full Council as the timescale which should be aimed for. Additional resources had been, and would continue to be, made available to support delivery in accordance with this timeframe, notwithstanding that achieving it would be dependent on a number of factors, many of which were outside officers' control. The timescale would be kept under review in the event that significant changes to the Plan were identified and there was some limited time contingency as the Local Development Scheme included provision for a Regulation 19 consultation starting in February 2026; however, this would only be used as a very last resort. In debate it was agreed that officers should provide regular updates (which would need to be in the Part II confidential agenda) to the sub-committee on compliance with the

timeframe to provide assurance to Members. It was also noted that any external consultants would need to be cognisant of the time constraints.

## RESOLVED

That the Local Plan Sub-Committee:

- (i) notes the contents of the report;
- (ii) agrees to receive progress updates at forthcoming meetings, noting that this should be by way of a simple oral report which should not be onerous for officers; and
- (iii) requests that officers seek further legal advice regarding the appropriateness of a Regulation 18 consultation.

## **LPSC54/25 HOUSING AND EMPLOYMENT TOPIC PAPERS**

The Senior Planning Officer and Planning Officer (Policy) presented the draft Housing and Employment topic papers. The Local Plan Sub-Committee was invited to note the contents and agree to publish Appendices 3 and 4 to the emerging Local Plan Evidence Base which could then be used by Development Management during decision-making. The sub-committee heard that the topic papers were 'living' documents, which would be updated throughout the plan-making process in order to reflect updated evidence and changes to the policy context.

The Senior Planning Officer provided an overview of the Housing topic paper, including the policy context, historic housing supply, and current and future evidence base. In relation to the findings of the Local Housing Need Assessment (LHNA), the following key points were highlighted:

- Owner occupation was most prevalent tenure type across south-west Hertfordshire, with Three Rivers having the highest levels of home ownership in the sub-region at 72%. Three Rivers had the lowest percentage of private rented dwellings across the subregion, as well as the second lowest percentage of socially rented dwellings.
- Within Three Rivers, 3-bedroom dwellings were most common, followed by 4- bedroom+, 2-bedroom and 1-bedroom. The LHNA analysis suggested that the greatest growth in the total housing stock between 2011-21 had been in 4+ bed dwellings (reflecting trends in rises of extensions to properties).
- The LHNA summarised that the standard method figures should be taken forwards as providing an appropriate assessment of housing need.
- The total affordable housing need per annum within Three Rivers was 527, split between 364 units for rented products and 163 home ownership units. For Three Rivers to meet full affordable housing need, approximately 1317 dwellings would need to be delivered per annum (if 40% of all dwellings delivered were affordable housing products, in line with emerging policy). The evidence from the study had suggested an increase in the discount from market value from 30% to potentially 40% in Three Rivers, given the high affordability issues in the District. The LHNA had also set out a case for Local Plan policies which supported provision of a range of affordable home ownership products.
- Given that all of the need was unlikely to be met, prioritisation of certain types of affordable housing was important. The LHNA stated that “the evidence points to a clear and acute need for rented affordable housing for lower income households, and it is important that a supply of rented affordable housing is maintained to meet the needs of this group”. At a strategic level across south-west Herts, the LHNA recommended that 70% of affordable housing should be focused on rented provision, and 30% intermediate/low cost home ownership.

- The LHNA had set out a recommended housing mix for both South West Herts and Three Rivers, in terms of different sizes and types of homes. However, it was cautioned that these figures were not prescriptive, that demand could change over time, and other factors may influence the mix.
- Hertfordshire County Council's Strategy was to more strongly develop the provision of specialist housing, particularly for extra care (assisted living), as an alternative to providing care home bedspace (which was expected to reduce future needs for residential care accommodation). The LHNA had set out that there was a need for approximately 2000-3700 dwellings for wheelchair users across South West Herts.
- In terms of specific market segments, the LHNA advised that custom and self-build policies should be reflected in Local Plan policies (usually 2-5% of greenfield sites over 100 homes) and had identified an emerging market for Build to Rent across South West Herts. The LHNA also advised further discussions with Herts County Council with regards to children's home spaces and that planning applications should be dealt with positively, so as to address a current lack of provision.

The Planning Officer (Policy) provided an overview of the Employment and Economy topic paper, which provided a summary from the South West Herts Retail and Leisure Study and the South West Herts Economic Study.

The South West Herts Retail and Leisure Study aimed to establish a retail catchment area, review the hierarchy of centres, assess the existing viability and vitality of town centres and district retail centres and produce a quantitative assessment of the future demand for retail floor space across the authority's area. However, the study was completed in 2018 and it was considered that the Council may undertake an updated study before publishing the draft Regulation 19 Local Plan.

The South West Herts Economic Study was the main piece of evidence analysed within the topic paper. This looked at the five local authority areas of Three Rivers, St Albans, Hertsmere, Dacorum and Watford and defined them as a Functional Economic Market Area (FEMA) due to (amongst other reasons) the districts sharing strong links in terms of migration, commuting and strategic transport infrastructure.

The South West Herts Economic Study had identified four priority sectors within the FEMA: film and TV; agritech; life sciences; and clean growth. For Three Rivers specifically, the study explained that there was a need for the Local Plan to set out a policy which allowed flexibility and a quick response to applications for new set building and other ancillary needs in relation to film and tv industry, where there was generally a need for ancillary space quickly and for short periods of time.

There was c124,000 sqm of vacant office space in the FEMA; in Three Rivers the availability rate had fallen since 2019-2023, and therefore office space should be protected as far as possible. Overall, there was no new need for office development, although there may still be demand from smaller businesses in local areas. However, it may still take some time following the pandemic to ascertain 'the new normal' for the office market.

Availability rates for industrial space within the FEMA had been consistently below 8%, suggesting that there was an under-supply of industrial space. When taking into account commitments, the shortfall in employment land within the FEMA for industrial storage and distribution combined was 9.5 hectares. In Three Rivers specifically, there was a need for 11,400 sqm of industrial space and 13,100 sqm of storage and distribution space. The total area provided from commitments and sites was 21,400 sqm and therefore the district fell short by a small amount of 3,100 sqm. The study suggested that the need for industrial space for individual districts should not be the level that should be planned for, as neighbouring districts may be able to provide for Three Rivers' needs.

Members of the sub-committee asked questions about the report and topic papers, which were responded to by officers. In debate the following points were discussed:

- A sub-committee member recommended that rather than 70% of affordable housing being focused on rented provision and 30% on intermediate/low cost home ownership, this split should be adjusted to 60% affordable rent / 40% First Homes due to the difficulties encountered by young people in finding housing which enabled them to remain in their local area. It was noted that discussion on this point should take place when the affordable housing policy came before the sub-committee later in the year.
- A sub-committee member questioned the methodology which had been used for the LHNA and commented that it was based on census information dating from March 2021 which had been collated during Covid. It was argued that the data had been affected by the particular economic and social circumstances which were prevalent during the pandemic. The member also commented that the particular demand arising from people looking to locate to the District from London, and the District's wider economic integration with London, meant that a singular economic needs and housing needs assessment for the South West Herts area was problematic. It was questioned whether another approach had been considered. Officers responded by outlining the difficulties associated with defining any alternative housing market area which took account of proximity to London, and noted that the methodology had been successful at examination for Watford, with the Examiner having been satisfied that South West Herts was a single strategic housing market area and a functional economic market area. Officers were therefore confident that with St Albans and Dacorum adopting the same approach, and alongside the Duty to Co-operate, this methodology would be viewed as sound at examination.
- A committee member argued that, given the likelihood of planning appeals with a lack of 5-year land supply, it was important not to publish data which indicated a high housing need. Instead, the emphasis should be on ensuring that the evidence published supported the need for a lower housing figure. In response it was noted that the housing need figures had been determined by independent consultants using the standard methodology and that there was therefore no scope for it to be changed; however, it was by nature a notional figure and did not represent either a target, or policy. It would be open to the Council to provide evidence as to why it could not be met on the basis of constraints. The sub-committee noted that there was some confusion around the term 'local housing need' where this referred to the housing need assessed under the standard method, as nationally defined.
- A sub-committee member queried the projections contained in the Employment and Economy topic paper, and whether the South-West Herts approach matched the situation in Three Rivers. For example, in relation to storage and distribution the report outlined that there was almost no need for additional new space within the district, whereas there were proposals to continue to increase storage and distribution in Maple Cross and proposals from developers for the conversion of office space. Officers responded that whilst there was a need to break down the expected demand at the district level so that it could be planned for, the location of storage and distribution within the FEMA was less important, and therefore there was flexibility around how the need would be met.

On being put to the vote, the sub-committee agreed to note the South West Hertfordshire Local Housing Needs Assessment Update and publish it to the Local Plan Evidence Base, the voting being 7 in favour, 4 against, 0 absentions.

On being put to the vote, the sub-committee agreed to note the South West Hertfordshire Economic Study Update and publish it to the Local Plan Evidence Base.

RESOLVED:

That the Local Plan Sub-Committee notes the contents of the report and agree to publish the following evidence studies to the emerging Local Plan Evidence Base (online website):

- (i) South West Hertfordshire Local Housing Needs Assessment Update, produced by Icenl (Appendix 3)
- (ii) South West Hertfordshire Economic Study, produced by Hatch (Appendix 4).

**CHAIR**