

## THREE RIVERS DISTRICT COUNCIL

**At a meeting of the Local Plan Sub-Committee held in the Penn Chamber, Three Rivers House, Rickmansworth, on Tuesday, 25 November 2025 from Times Not Specified**

**Present:** Councillors Councillor Stephen Giles-Medhurst OBE, Councillor Louise Price,

Oliver Cooper, Steve Drury, Vicky Edwards, Philip Hearn, Reena Ranger (In place of Philip Hearn) and Sarah Nelmes

**Also in Attendance:**

Councillor Rue Grewal

**Officers in Attendance:**

**External in Attendance:**

### **LPSC28/23 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillor Stephen Cox with Councillor Stephen King substituting, Councillor Philip Hearn with Councillor Ciaran Reed substituting.

### **LPSC29/23 MINUTES**

The minutes of the meeting held on 8 October were agreed as a correct record and signed by the Chair.

### **LPSC30/23 NOTICE OF URGENT BUSINESS**

The Chair reported that no items had been notified under Procedure Rule 30.

### **LPSC31/23 DECLARATIONS OF INTEREST**

Councillor Ciaran Reed, Oliver Cooper and Vicky Edwards declared a non-pecuniary interest in relation to ACFS10, concerning land owned by a member of their political party.

### **LPSC32/23 LOCAL PLAN: AMENDED DRAFT POLICIES FOR REGULATION 19**

Officers introduced the report, explaining that the appendices contained proposed amendments in red, based on Member instructions from earlier meetings, consultation responses from the Part 5 Regulation 18 consultation and further policy review.

Jon Bishop, Chair of the Three Rivers Joint Residents Association addressed the Committee before the consideration of the item. Concern was expressed that several draft policies continued to use the word "should" rather than "must" which weakened the council's ability to defend and apply the policies. Issues with the Local Connection policy were highlighted including that certain affordable housing products did not apply to social or affordable rent. Appendix 13 (Parking Standards) First two paragraphs were unclear and required redrafting.

The upcoming Planning and Infrastructure Bill were likely to reduce decision making powers which would mean that policy wording would need to be strong and unambiguous.

#### Appendix 1 Biodiversity

The policy had been consulted on during the Regulation 18 Part 5 consultation, receiving extensive feedback from statutory bodies and the public.

Concern was raised about the location of Biodiversity Net Gain (BNG) sites, with a request that BNG be delivered within the parish or unparished area of development where possible. Officers explained that Hertfordshire County Council had previously challenged the restriction of BNG to the Three Rivers Boundary. National Character Areas meant tighter restrictions were difficult to justify. Members sought stronger wording to prioritize local BNG delivery without making it a rigid requirement.

Officers agreed to strengthen the policy to state that BNG should be provided “within Three Rivers, ideally within the appropriate parish or unparished area where possible”. Retain flexibility by avoiding use of “must”, but include the additional encouragement requested.

The Appendix was carried by general assent.

#### Appendix 2 Chilterns Beechwoods Special Area of Conservation

No changes had resulted from consultation. A member queried whether onsite or district based SANG provision could be emphasized. Officers agreed this could be emphasized. Officers agreed that this could be strengthened, but a strict requirement may not be justifiable.

On being put to the vote, the Appendix was carried by general assent.

#### Appendix 3 Northwood Headquarters

Councillor Cooper raised an amendment:

“Due to the need for operational secrecy, the evidence provided by the Ministry of Defence of the national security impact of development may be more limited than for other consultees. This council recognises that and will defer whenever possible to representations from the Ministry of Defence regarding the national security impact of development.”

The amendment was carried by general assent

The Appendix was carried by general assent.

#### Appendix 4 and 5 Net Zero Operation Carbon in New Build Residential Development and Net Zero Operation Carbon in New Build Non-Residential Development.

Members discussed energy performance thresholds, fossil fuel exceptions, and the feasibility of certain standards.

Key issues that had been raised included the possible adjustment of the 65kWh/m<sup>2</sup> energy target, recognition that some commercial uses (Pizza ovens, cement processes) currently require fossil fuels and some exceptions might be needed. Members expressed concern that the carbon offset figure was potentially 100x higher than real world offset costs. It was clarified that this was based on methodology.

Officers agreed to remove the specific price from the policy wording and replace instead with the offset rate set by the Department for Energy Security and Net Zero to give more flexibility for future national methodology changes.

The Appendix was carried by general assent.

#### Appendix 6 Climate adapted design and construction

Members welcomed the strengthened policy. Minor text corrections were identified for officers to adjust.

The Appendix was carried by general assent.

#### Appendix 7

Members had no major concerns, and thanked officers for the included improvements.

The Appendix was carried by general assent.

#### Appendix 8 Reducing Carbon Emissions in Existing Buildings

Some members expressed significant concern that the policy could make home extensions prohibitively expensive, potentially impacting on families needing extra space and may conflict with local authorities from exceeding national energy efficiency standards.

Appendix 8 as it stands was put to the vote and with 5 votes for, 3 votes against and 0 Abstentions, the appendix carried without change.

The Appendix was carried by general assent.

#### Appendix 9 – Affordable Housing

Some Members challenged the inclusion of “adult” siblings on the local connection criteria. Members argued that only minors or those with genuine caring responsibilities should qualify. Part time work for 12 months was felt by some to be insufficient to constitute a meaningful local connection. Officer clarified that caring responsibilities are already captured in a separate criteria and a future SPD would provide detailed definitions after the adoption of the plan.

The Appendix was carried by general assent.

#### Appendix 10 Housing Mix and Type

Concerns were raised about the recent HMO issues within the district. Members wished to strengthen policy to safeguard neighboring amenity, character, and parking capacity. Officers confirmed that TRDC has a low number of HMOs but issues had recently arisen. No SPD is planned as licensing matters sit with the housing team.

The Appendix was carried by general assent.

#### Appendix 11 Green Belt

Members expressed concern about referencing specific versions of the NPPF within the local plan. Frequent NPPF updates make references unstable. Officers confirmed references do not override national policy but agreed to remove outdated or irrelevant plan making text but retain reference to concepts such as the grey belt where helpful to applicants.

The Appendix was carried by general assent.

## Appendix 12 and 13 Parking and Parking standards

Members discussed the parking requirements that vary due to location. There had been concern that too little parking in station-adjacent developments could attract non local residents and create local pressure. Members agreed that HMOs should also reflect appropriate parking requirements such as 1 parking place per room.

The Appendix was carried by general assent.

## **LPSC33/23 GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE UPDATE**

Officers introduced the report summarizing the Council's Gypsy and Traveller Accommodation Assessment (GTAA) and the identified need for additional pitches and comparative approaches taken by neighbouring authorities.

The GTAA had identified a specific unmet need for both Gypsy/traveller pitches and Travelling Showpeople plots within the plan. Demand was split between Household formation within existing sites and new households not currently living on authorized sites. Significant challenges exist in Three Rivers due to Extensive Green Belt coverage and limited suitable land with good access.

Members acknowledged the difficulty of identifying new standalone sites in Three Rivers due to the Green Belt restrictions. They discussed whether intensification of existing sites could realistically meet the need, or whether this would over burden certain communities. Officers clarified that some sites have physical capacity for modest expansion. Intensification would not exceed capacity where it risked generating overcrowding or unacceptable amenity impacts. Every potential intensification option would undergo full assessment.

Members considered whether incorporating a small portion of new large housing allocations (e.g. 300-500 dwelling sites) to provide a few Gypsy/Traveller pitches would promote better community cohesion and avoid concentrating need in particular parts of the district and be more suitable for accessing utilities, services, healthcare and education. Some members queried potential community pushback and how this would be managed. Officers advised that national planning guidance strongly supports integrated provision and that many councils successfully include pitches within strategic sites. Early engagement with developers would ensure properly designed layout, screening, utilities and access.

Members sought confirmation that new or expanded pitches would have proper access to utilities, meet modern design and safety standards and provide sufficient amenity space. Officers confirmed that all allocations would include detailed design criteria, including minimum pitch size, highway safety and access would be fully tested and screening or boundary planting would be required.

The substantive motion was put to the vote and with 6 votes For, 1 vote Against and 2 Abstentions, the motion as carried.

## **LPSC34/23 REGULATION 18 PART 5: CONSULTATION SUMMARY REPORT**

Officers presented an overview of consultation responses, covering themes such as clarity of policy wording, housing site objections, environmental concerns, affordable housing definitions, traveller accommodation and climate/ energy standards.

Members emphasized the need for consistent and enforceable language ("must" where appropriate). The importance of demonstrating responsiveness to consultation through the Regulation 19 draft. Ensuring that public feedback, Member input and evidence are clearly linked to resulting policy amendments.

The report was noted and officers were asked to review policy wording comprehensively, ensure all changes agreed were incorporated and provide clear justification where suggestions could not be implemented.

The substantive motion was put to the vote and was agreed by general assent.

With all remaining Part 1 business having been concluded the Chair agreed to allow Jon Bishop, of the Three Rivers Joint Residents Association to further address the Committee.

Mr Bishop thanked members and officers for their considerable work over the years on the Local Plan and taking onboard the issues the TRJRA had raised and the proactive engagement with the TRJRA recognized the very difficult position that the Council had with the Government's housing targets for Three Rivers but hoped that a consensus from the Councillors could be found to unite over a preferred plan that protected as much of the Green Belt as possible whilst recognizing some might have to be released.

The Chairman thanked Mr Bishop and the TRJRA for their hard work and the positive contributions that they had made to the process.

### **LPSC35/23 OTHER BUSINESS - IF APPROVED UNDER ITEM 3 ABOVE**

#### **LPSC36/23 EXCLUSION OF PRESS AND PUBLIC**

The Chair moved that under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that it involved the likely disclosure of exempt information as defined under Paragraph 3 of Schedule 12 A to the Act following the advice of the Monitoring Officer.

An amendment was raised to move the Part 2 item to Part 1.

The amendment was put to the vote that the business should be in part 1 with 3 vote For, 6 votes Against and 0 Abstentions, the amendment fell and the discussion continued in Part 2.

#### **LPSC37/23 LOCAL PLAN: REGULATION 19 RECOMMENDED SITES**

Officers introduced the report stressing the proposal were officer recommendation but that the submission of a lower than number of dwellings that the Government figure might risk the plan being rejected at a Public Examination but recognized that it was so far not possible to present a plan that meet the said target. Officers stressed further work would be required to finish the sustainability and accessibility assessments and that site figures might change further before the publication of the Regulation 19 in January.

Councillor Giles-Medhurst previously circulated a revision of this item for the Recommendation to Policy and Resources on 26 January ahead of the meeting. It was also noted that officers had miscalculated the number of dwellings and this would be rectified ahead of the Policy and Resources Committee meeting in January.

“Administration proposal for Regulation 19 sites listed in the Appendix attached.  
Total 4977 dwellings based on current assessments: Commitments of 763, Windfall of 630  
Total: 6369

Reasons for exclusion from the officer Recommendations

- CFS26a The Kings Langley Estate (south) – 1,125 dwellings  
Is an area assessed in Stage 4 Green Belt review as of Fundamental Importance and would undermine on three grounds its contribution to the Green Belt (a), (b) and (c). It requires the development of agricultural land to the M25, requires a new road traversing the site potentially

undermining any SANG contribution. Any additional shopping core is likely undermine the viability of the Abbots Langley Town centre. Note: Previously rejected in 2023.

- CFS21 Land at Rousebarn Lane – 600 and NCFS6 Land North of Little Green Lane - 35 dwellings

These are greenfield agricultural sites in the Green Belt development of which would include an urban sprawl in open countryside north of Little Green Lane into the Saratt area. There remain road accessibility concerns given its distance from the main line station and local shopping centre on the Watford Road. Note: Previously rejected in 2023

- PCS4 East Green Street – 678 dwellings

This is a greenfield site within the Green Belt and Chilterns National Landscape. It has status within the Chilterns National Landscape. The interpretation of whether the site's location within the Chilterns National Landscape is a strong reason for its removal is given the impact on the wider National Landscape. There remain highways accessibility issues to the Chorleywood Centre due to the current road network. Note: Previously rejected in 2023

- PCS47 South of Little Oxhey Lane – 485 dwellings

Is an area assessed in Stage 4 Green Belt review as of Fundamental Importance and would undermine on two grounds its contribution to the Green Belt (a) and (b) and requires the development of agricultural land to the boundary with the London Borough of Harrow. Whilst there is a small shopping area with a sustainable location access is limited by a narrow road bridge over the main line railway. The Carpenders Park local centre and station is in excess of the accessible distance thresholds. Note: Previously rejected in 2023

- NCFS12- Land East of Oxhey Lane.- 381 dwellings

Is an area assessed in Stage 4 Green Belt review as of Fundamental Importance and would undermine its purpose on two grounds of contribution to the Green Belt (a) and (b). It requires the development of open land to the boundary with the Hertsmere Borough with a local wildlife site and adjacent flood zone 2 and 3 . It lacks pedestrian, links along Oxhey Lane and to local centres.

- NCFS6 Land to East of Watford Road – 331 dwellings

Is mainly a green field site in flood risk areas 2 and 3 with previous concerns raised by the Environment Agency. Concerns remain that the only vehicle access can be achieved via the dualled- A41 and its close proximity to junction 20 of the M25 with Highways England questioning its suitability. A neighbouring site for a motorway service was dropped due to such concerns. It remains detached from any local centre separated by both railway lines and the M25.

- CFS18 Hill Farm- 100 dwellings

Amend site boundary and description to CFS18a, exclude the Local Wildlife site and removal of southern field that is not grey belt, adjust map accordingly to enable clear separation from the Herongate Conservation Area."

Councillor Reed raised an amendment to the site CG65

" 1. Change in "Use(s) Proposed" from "Residential" to: "Residential/Community"

2.Add to "Site description" at end: "The development must include a community space, office space and meeting spaces."

3. Add to "Further Constraints/Considerations". "The landowner (Three Rivers District Council) has said that they will provide office space, meeting spaces for Croxley Green Parish Council and a new community space on the site."

4. Add to "Conclusion" as extra third paragraph: "The site must provide office space, meeting spaces for Croxley Green Parish Council and a new community space on the site"."

A further amendment was raised for NCF15 by Councillor Reed

“1. Change in “Further Constraints/Considerations” from “should” to “must”

2.Change in “Conclusion” in first paragraph “it would be highly desirable to” to “the site must”

The amendments from Councillor Reed were approved by assent of the Chair and included in the Chairs proposals.

Councillor Cooper raised an amendment:

“Remove the following and make necessary subsequent changes to housing numbers:

- ACFS9b (land at Little How Croft)
- ACFS13b (land at Hampermill Lane)
- CFS3 (Fraser Crescent)
- CFS7 (Bedmond Road)
- CFS13 (land at Oxhey Lane Watford Heath)
- CFS14 (land north of Oxhey Lane)
- CFS16 (land at Chorleywood Station)
- CFS18 (Hill Farm, Stag Lane)
- CFS21 (Land at Rousebarn Lane)
- CFS26a (Kings Langley Estate, Abbots Road)
- CFS26c (West of the Kings Langley Estate)
- CFS47c (Adams Nursery, Church Lane)
- CFS56 (Church Hill Road, Bedmond)
- CFS65 (land north of Bucknalls Lane)
- EOS7.0 (land at Shepherds Lane)
- EOS12.2 (land to the West and South of Maple Cross)
- EOS12.3 (land to the north of Chalfont Road)
- NCFS6 (land to the east of Watford Road)
- NCFS11 (Grange Wood, Oxhey Lane)
- NCFS12 (land east of Oxhey Lane)
- NCFS17 (North Hill Farm)
- NCFS20 (Lonsdale, Hyde Lane)
- NCFS36 (land North of Little Green Lane)
- NSS6a (Northcott, East Lane)
- NSS10 (land at Mill Place)
- NSS20 (land adjacent to RES, Egg Farm Lane)
- PCS4 (east Green Street, Chorleywood)
- PCS18 (land south of St Joseph’s, South Oxhey)
- PCS47 (south of Little Oxhey Lane)”

Members discussed the difficulty of reaching a balanced and defensible position. Concerns were raised about how a planning inspector might view significantly reduced numbers, particularly where sites within the grey belt were proposed for removal. It was acknowledged that removing such sites could be challenging to justify, and there was caution about moving the plan in the wrong direction.

Questions were raised about the basis for excluding all of the proposed sites. In response, it was argued that the principle issue was unsustainability. The sites were considered incapable of meeting sustainability criteria, even after extensive work by officers to justify as many sites as possible under the previous standard method.

Members noted that having clear reasons for proposed site removals would be helpful in order to comment meaningfully and expressed concern that without such clarity the council risked having a plan imposed without adequate opportunity for input.

Clarification was sought regarding the deliverability of a site. Officers confirmed that dialogue with the landowner had taken place. The landowner was considering both supermarket and residential options but there were concerns about how these would integrate on the site.

It was noted that the seven sites proposed for removal by the Administration had been drawn from an earlier list put forward by the conservative group.

The area behind the Flower House ACF68b had raised concerns including past planning breaches such as the installation of unauthorized parks.

Members raised concerns about the site at CFS26c, access limitations caused by railway bridges were identified, and Network Rail had indicated that improvements would not be possible until after the works were completed. It was noted however that the site lay opposite another location providing access, and that around 150 homes would be within walking distance of the railway station, making the assessment more complex. Officers highlighted that pedestrian access through the station strengthened the sites sustainability profile, and that inspectors frequently relied on pedestrian connectivity when evaluating sites. It was further noted that vehicular access did not necessarily need to route through Kings Langley, and therefore it would be difficult to argue that a site adjacent to a railway station lacked sustainability.

Concerns were raised about overall housing numbers and the risk of the authority being used as an example due to national housing pressures. While acknowledging the desire to reduce allocations, it was felt that significant reductions may not be realistic.

The amendment was put to the vote and with 3 votes for and 6 against, the amendment fell.

The substantive motion as moved by the Chair and duly amended was put to the vote. The proposal motion was carried by General Assent.

The Chair closed the meeting at 9.55pm.

**CHAIRMAN**