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## THREE RIVERS DISTRICT COUNCIL

**At a meeting of the Local Plan Sub-Committee held virtually on Monday, 10 July 2023 from 7.00 - 9.02 pm**

**Present:** Councillors

Stephen Giles-Medhurst  
Philip Hearn  
Sarah Nelmes  
Chris Mitchell  
Oliver Cooper  
Ian Morris (In place of Rue Grewal)  
Sara Bedford (In place of Phil Williams)  
Chris Lloyd

**Also in Attendance:**

Sarah Haythorpe  
Anita Hibbs

**Officers in Attendance:**

Marko Kalik

**External in Attendance:**

### **LPSC8/23 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillor Phil Williams, substitute being Councillor Sara Bedford, Councillor Rue Grewal, substitute being Councillor Ian Morris

An apology for absence was also received from Councillor Stephen Cox.

### **LPSC9/23 MINUTES**

The minutes of the Local Plan Sub-Committee meeting held on 13 June 2023 were deferred to be considered at the next meeting on 3 August 2023.

### **LPSC10/23 NOTICE OF OTHER BUSINESS**

None received.

### **LPSC11/23 DECLARATION OF INTERESTS**

None received.

### **LPSC12/23 LOCAL PLAN PRESENTATION**

The Chair clarified that this meeting was a briefing meeting with no recommendations at this stage. Recommendations would come forward at the next two meetings on 3 August and 24 August and any further meetings if necessary. The aim of this meeting was to provide more details on Local Plan, prior to bringing the full report and supporting papers for consideration at the next meeting.

The presentation from the Head of Planning Policy and Conservation gave an insight on our approach with the Green Belt constraint policy and the proposals to be put forward for a new Regulation 18 consultation.

The Head of Planning Policy and Conservation recapped on the agreed approach:

- Standard methodology target of 637 dwellings per annum as a starting point for housing need
- Exceptional circumstances for Green Belt release such as affordable housing, housing for elderly
- Regulation 18 sites in low, moderate harm Green Belt areas considered acceptable (subject to other considerations)
- Strategic sites – benefits may outweigh harm to Green Belt
- No updates yet to the National Planning Policy Framework (NPPF) – expected to be delayed until the autumn
- This approach had not been tested at examination – need to build a strong case

The presentation covered the following:

- NPPF – Sustainable development
- Housing numbers
- Growth Options
- Non-statutory consultees – Support
- Non-statutory consultees – Objections
- Strategic Green Belt sites – Moderate
- Urban brownfield sites – Statutory Consultees
- Low to Moderate Green Belt Harm sites
- Low to Moderate Green Belt Harm sites – Statutory Consultees
- Regulation 18 Higher Harm Green Belt sites – Non strategic
- Strategic Green Belt sites Moderate to High – need further consideration
- Strategic sites – Statutory Consultees
- Strategic sites – Benefits
- Regulation 18 Removed sites

Members raised the following questions and comments:

Q - What will be the method used to determine the sites' harm rating?

A - The approach officers have taken is if part of a site falls into a higher harm area then they would relook at the boundary to include just the low to moderate harm part of the site. The Green Belt review clearly set out that any boundaries where harm would have changed, they would change the harm at that point. Officers would only consider a strategic site with both low to moderate and high harm parts if the benefits of the whole site would outweigh the harm to the Green Belt.

Q - What is the basic calculation for the 530 dwellings per annum?

A - This figure was the initial findings of the Local Housing Needs Assessment (LHNA), which is one of the key pieces of evidence-based work for the Local Plan. The assessment is carried out by consultants who are experts in this type of analysis. They also look at the needs for different types of housing; affordable housing, accessible housing for the elderly and the need for 2-, 3- or 4-bedroom housing.

Q - How does the housing assessment work and where is the cut off?

A - The starting point for LHNA is looking at the Strategic Housing Market area, which is calculated on commuting patterns and house pricing across the whole of southwest Hertfordshire. The overall need, not individual settlements within the districts would be considered, and then officers and members would calculate what they think is the best approach and where that housing need should be allocated within the district.

We cannot continue building new houses without adding to the infrastructure, particularly for education and health. We need to look at ingenious use of the land to build at a higher density, instead of building flats look at building houses.

Q - What is the reason for thinking that the plan can get thrown out of examination for not fulfilling the full housing target without altering Green Belt boundaries?

A - The plan that is being put forward does not meet the standard method. The standard method is only the starting point. Unless there are legislation changes, we are going to have a plan that does not meet the standard methodology figure based on Green Belt constraints.

The Head of Planning Policy and Conservation reiterated all the risks; and as the policy had not changed, and there had been delays with the process. There was a potential risk that the Inspectors will make decisions against existing policy, which could result in the plan being thrown out of examination.

Q - Is there a guideline or definition of harm and benefit, and what consideration are decision makers taking into account to define them?

A - When looking at exceptional circumstances for Green Belt release, it is different to the approach of very special circumstances in planning applications. Exceptional circumstances would include affordable housing, houses for the elderly and delivery of infrastructure. These are the exceptional circumstances that would demonstrate the need for Green Belt release. Officers then would split the process into two phases; firstly, looking at the areas that fall into the lowest harm, and then weighing up the benefits. They would then look at the larger strategic sites which can potentially deliver providing a school, GP surgery, local shops and more sustainable transport options.

Urban brownfield sites

The total number of brownfield sites is 1022.

The commentary and the points clarified by the Head of Planning Policy and Conservation would need to be captured in the minutes and made available to the public. Advice will be sought from Legal officers regarding this.

Low to Moderate Green Belt Harm sites will be brought back to the next meeting to be reviewed. Two of the strategic sites on Low to Moderate Green Belt Harm sites are above the 500 dwelling numbers, but their additional benefits are included.

Low to Moderate Green Belt Harm sites refers to only the lower moderate and excludes the high harm part of the Hill Farm, Stag Lane site.

The Chair emphasised that no decision had been made on these sites. Recommendations will be made by officers to the Policy and Resources Committee to be ratified at Full Council in October.

Two brownfield sites had been included in the Low to Moderate Green Belt Harm and one brownfield site in the Moderate to High Green Belt Harm sites. Although they fall into these categories, officers still want to bring these brownfield sites forward where possible.

The Regulation 18 higher harm Green Belt strategic sites would not be considered at this stage as they fall into the higher harm and very high harm categories. The strategic Green Belt sites that fall into moderate to high harm will come back for further consideration. These were sites which officers will be looking at whether or not any of the benefits outweigh the potential harm in the moderate to high area.

Q - What benefits are there to the local community when building on sites that are currently open fields?

Benefits would be on what the community could gain, and these could include country parks, GP surgery, sports facilities and community centre. If there are no benefits that would outweigh the potential harm, then they would not be progressed.

Q - What is the plan for the type of properties that are going to be built on these sites?

A - The housing mix is specifically covered in our policy as well as the affordability information. Officers have revisited the housing mix within the policy. at the Members' request. and lowered the percentage of 4+ bedroom homes, and a much higher percentage of 2-to-3-bedroom homes to ensure that we have the right family housing mix in Three Rivers.

Hertfordshire County Council suggested that the 3 strategic sites in Abbots Langley and Kings Langley would work better if they were combined from a transport and access prospective. There would need to be further discussions with the landowner on this.

Q - Would building schools be a priority or would it be the homes that are built first?

This would be part of the planning requirement, and the normal process would be that the school would be available and open, once the first dwellings are occupied. Officers will have ongoing discussions with various departments within Hertfordshire County Council. They have a method of looking at existing needs, and at the same time they also look at their expected growth, which will then enable them to calculate when there should be a school provided.

Q - Would doctors' surgeries also be part of the planning requirement?

A - The need for doctors' surgery would come through the site allocation process, and officers would be in discussion with the NHS through this process.

Officers required that the sites be allocated to meet all policies set out in the Local Plan.

The Chair requested information on housing mix in the Local Plan be recirculated to Members.

It was agreed that site CFS10 (Land between Millhouse Land and Bell Lane, Bedmond) should not be reconsidered as this site had been publicly ruled out.

The Chair requested the presentation slides be updated and circulated to Members.

RESOLVED:

That the presentation be noted.

**CHAIRMAN**