

Three Rivers District Council

# Sub-Committee Report

24 August 2023

## **LOCAL PLAN SUB-COMMITTEE - 24 AUGUST 2023**

### **POLICY AND RESOURCES COMMITTEE – 5 OCTOBER 2023**

#### **PART I – NOT DELEGATED**

#### **5. LOCAL PLAN – Moderate-High Harm and High Harm Strategic Green Belt Sites and Newly Submitted Sites (DEIP)**

##### **Summary**

- 1.1 This report sets out the Regulation 18 strategic sites of circa 500 dwellings or more that fall into areas of moderate-high to high Green Belt harm and whether the benefits of these sites in terms of sustainability and infrastructure provision potentially outweigh the harm to the Green Belt of removing these sites for development, following the approach agreed at the 13 June 2023 Local Plan Sub-Committee.
- 1.2 The report also considers a strategic site that falls into low to moderate harm, one smaller low to moderate Green Belt harm site that required some additional work from officers as well as a C2 care home site that falls into moderate-high Green Belt harm.
- 1.3 At the 13 June 2023 Local Plan Sub-Committee it was agreed that no sites that fall within areas of very high Green Belt harm would be considered acceptable even if they are strategic in nature.
- 1.4 A number of new sites were submitted as a result of the Regulation 18 Additional Sites for Potential Allocation consultation earlier this year and one site was submitted through the brownfield call for sites exercise. These sites have been assessed and are discussed later in the report.

##### **Introduction**

- 2.1 At the 13 June 2023 Local Plan Sub-Committee it was agreed that a Green Belt as a constraint approach would be followed in selecting sites for inclusion in a further round of Regulation 18 consultation on lower housing numbers later this year.
- 2.2 The approach includes sites that were agreed for consultation in the 2021 Sites for Potential Allocation and 2023 Additional Sites for Potential Allocation Regulation 18 consultations that are either urban brownfield sites or that fall into areas of low to moderate Green Belt harm as set out in the Council's Stage 2 Green belt Review. These sites were agreed at the 3 August Local Plan Sub-Committee.
- 2.3 Further consideration now needs to be given to strategic sites, of circa 500 dwellings or more, that fall within areas of higher Green Belt harm where the benefits of these sites in terms of sustainability, access to services and infrastructure provision may outweigh the harm to the Green Belt.
- 2.4 This report seeks agreement from Members to recommend to Policy and Resources committee the strategic sites and one newly submitted brownfield site to be included in a further round of Regulation 18 consultation on lower housing numbers later this year.

## Background

- 3.1 In 2021 the Council consulted on a draft Regulation 18 version of the Local Plan. The document considered preferred policy options and set out the sites that could potentially be allocated for development in the Local Plan.
- 3.2 The Government's standard method for calculating housing need was used to determine the Local Plan housing requirement which at the time came to a requirement of 630 dwellings per annum.
- 3.3 In calculating housing need, a plan period of 2018 to 2038 was used resulting in a total requirement of 12,624 dwellings. Completions, commitments (approved planning permissions) and a windfall allowance were taken off this total leaving a residual target of 10,678. The draft Regulation 18 plan failed to meet this target and planned for 8,973 dwellings, 1,705 dwellings short.
- 3.4 As a result of this consultation a further 18 sites were submitted for the Council's consideration and a further three sites were re-submitted with updated proposals. These sites were assessed and six sites were considered appropriate for potential allocation.
- 3.5 The six sites were consulted on in 2022/23 in the Additional Sites for Potential Allocation document. Adding 825 dwellings to the total. In the meantime, a number of sites were removed or had dwelling capacities altered leaving the deficit to the residual housing target at 1,318 dwellings. This concluded this round of Regulation 18 consultation and the Council needed to then decide whether to press ahead with the Regulation 19 stage or whether to go out on further Regulation 18 consultation considering different levels of growth.
- 3.6 In December 2022 the Secretary of State for Levelling Up, Housing and Communities wrote to MPs about proposed reform to the planning system. A key message set out in the letter was that whilst the standard method for calculating housing need would be retained it should be an advisory starting point, a guide that is not mandatory. They also emphasised that local planning authorities are not expected to review the Green Belt to deliver housing.
- 3.7 Following this the Government consulted on planning reform reiterating that the standard method calculation would remain unchanged at least until they have reviewed the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024.
- 3.8 The ability for local authorities to use an alternative approach to the standard method where there are exceptional circumstances that can be justified was proposed to be retained. It was however proposed that it would be made clearer in the NPPF that the outcome of the standard method is an advisory starting point to inform plan-making, a guide that is not mandatory. They propose to give more explicit indications in planning guidance of local characteristics that may justify an alternative method. To date no such guidance has been produced. The examples given in the consultation were islands with a high percentage of elderly residents or university towns with an above-average proportion of students, neither of which apply to Three Rivers.
- 3.9 **It should be noted that this was just a consultation and that neither the consultation nor the letter from the Secretary of State constitutes a statement of national planning policy. The National Planning Policy Framework and Planning Practice Guidance remain unchanged and it is to this framework we are required to work.**

- 3.10 At Full Council in December 2022 Members unanimously agreed to add a further round of Regulation 18 consultation to the Local Development Scheme (Local Plan timetable). It was agreed that this further Regulation 18 consultation would be focussed on lower housing numbers than had been consulted on in the previous round of Regulation 18 consultation.
- 3.11 In December 2022 the Secretary of State for Levelling Up, Housing and Communities wrote to MPs about proposed reform to the planning system. A key message set out in the letter was that whilst the standard method for calculating housing need would be retained it should be an advisory starting point, a guide that is not mandatory. It stated it would be up to local authorities, working with communities, to determine how many homes can actually be built, taking into account what should be protected in each area.
- 3.12 The letter went on to state that housing need in itself was not an exceptional circumstance for altering Green Belt boundaries. By stating that Green Belt release is not a requirement in order to meet housing need the Government aims to remove ambiguity about whether authorities are expected to review the Green Belt to meet housing need. Although there have not been any changes yet made to national policy, in making this statement officers believe the Government has already removed this ambiguity to an extent. For this reason, officers believe that the District's Green Belt constraint can now be used as an argument for lower housing numbers.
- 3.13 At the 13 June 2023 Local Plan Sub-Committee Members agreed the approach to housing need and Green Belt where only sites in areas of moderate Green Belt harm or less, as set out in the Stage 2 Green Belt Review, are considered acceptable for residential development (subject to other considerations) unless the site is considered strategic and the benefits of the site are considered to outweigh the harm caused by its release from the Green Belt.
- 3.14 At the 3 August 2023 Local Plan Sub-Committee the sites falling within the urban area and low to moderate harm Green Belt sites were agreed to be recommended to the Policy & Resources Committee for inclusion in a further round of Regulation 18 consultation.

## **Details**

- 4.1 A presentation will be given at the 24 August Local Plan Sub-Committee on the strategic sites to aid Members in their consideration of the sites. Officers will run through the summary slides at the Sub-Committee meeting providing the criteria that Members should consider when making decisions on sites, a summary of site details, a summary of their performance in the Sustainability Appraisal and Sustainability Appraisal Working Note (appendices 3 and 4).
- 4.2 To assist with Members' decisions regarding the additional sites the presentation will also set out the criteria that Members have to consider in reaching a decision to comply with national policy. This includes taking into consideration the technical assessment of the sites through the SHELAA, the sustainability of the site, its access to services, and the spatial strategy.
- 4.3 It should be noted that the sites recommended for inclusion in the Regulation 18 consultation on lower housing numbers have been determined to be suitable for development through the site assessment process of the Strategic Housing and Employment Land Availability Assessment (SHELAA) which has been informed by the evidence base studies. This means that policy and physical constraints (such as flood risk, Local Wildlife sites, TPOs, potential effects on landscape,

historic environment etc.) have already been considered and it has been determined that the sites are suitable for development.

- 4.4 The environmental, economic and social credentials of the development options and policies in the emerging Local Plan have been subject to a Sustainability Appraisal (SA) and is a process undertaken at various stages of the Local Plan process. The SA plays an important role in demonstrating that the Local Plan reflects sustainability objectives and has considered all reasonable alternatives. It incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive.
- 4.5 As previously reported to the Local Plan Sub Committee there is a legal requirement for the Council to consider the Sustainability Appraisal when making decisions on both policies and sites to be allocated for development.
- 4.6 In order to assist Members, the summary slides will include a table that summarises the assessment of each site against the SA objectives. The detail of the assessment is in the Sustainability Appraisal Report (June 2021) and Sustainability Appraisal Working Note (November 2022).

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA/SEA objective
-	Neutral – The option is unlikely to impact on the SA/SEA objective
x	The option is likely to have a negative effect which is not significant
xx	The option is likely to have a significant negative effect
✓/x	The option is likely to have some positive and some negative effects, none of which are significant

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site XXX	x	?	?	✓	-	x	-	-	x	✓	✓	✓	✓	-	-

- 4.7 Each site under consideration for allocation in the new Local Plan has been individually assessed in terms of its accessibility to services. This has been achieved through an approximate distance measurement between potential housing sites and the location of the service. The distance measurement is taken

from the centre point of the site, assumes a flat terrain and direct route as a result of the difficulty in mapping these aspects. It is recognised that in reality this may not be the case and further work will be undertaken in terms of access to services and fed back into the Regulation 19 stage of the plan-making process.

4.8 In order to determine levels of access to services, the following distance thresholds<sup>1</sup> have been used between housing and services, under which the service may be considered accessible.

4.9 **Table 3: Accessibility ideal standards:**<sup>2</sup>

Service	Distance Threshold
Stations	800m – 1600m
Primary Schools	400m - 800m
Secondary Schools	1600m - 3200m
GP Surgeries	800m – 1600m
Convenience shops	800m - 1600m
Open Spaces	400m – 800m
Convenience shops	800m – 1600m
Open Spaces	400m – 800m

4.10 Details of the distances and/or thresholds to existing services, have been provided in the site summaries.

4.11 In the consideration of sites, Members should take account of the infrastructure and services that are proposed to be provided on site as well as the accessibility to existing services.<sup>3</sup>

4.12 The SHELAA assessments and SA report and working note for the sites is contained in the appendices to this report. The Green Belt Reviews, SHELAA methodology and other evidence base studies were published alongside the previous Regulation 18 consultations and are available to view on the Council's website at:

<https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan#Evidence%20base>

4.13 The strategic sites agreed by Members of the Local Plan Sub-Committee to be recommended to the Policy & Resources Committee for inclusion in the Regulation 18 consultation on lower housing numbers will be reported to the Policy & Resources Committee as part of the whole consultation document

<sup>1</sup> As was the case for the 2021 Regulation 18 consultation, the distance thresholds are based on Three Rivers Access to Services Study 2007, Barton, H. et al (1995), Sustainable Settlements: a guide for planners, designers and developers, UWE, Bristol and DETR (2001) PPG13: Transport, HMSO, London

<sup>2</sup> Important facilities to which people can usually be expected to walk to should be a maximum of 400m away. Local facilities which are ideally accessible by foot should be a maximum of 800m away.

Local facilities to which it is not reasonable to expect all people to walk to, but which could be walked to by those who choose should be a maximum of 1600m away. Facilities which are less local but should be within cycling distance should preferably be within 5000m, and no more than 8000m away.

<sup>3</sup> A site that is outside the accessibility thresholds of an existing service/facility may be capable of providing that service/facility on site.

together with the sites agreed by Members at the 3 August Local Plan Sub-Committee.

- 4.14 Appendices 5 and 6 provide summaries of the statutory consultee comments and non-statutory consultee comments respectively to the 2021 Sites for Potential Allocation and 2023 Additional Sites for Potential Allocation consultations. Not all the sites included in the report received relevant comments and therefore not all the sites are included in the summaries.

#### **Strategic Sites recommended for consultation:**

- 5.1 All the strategic sites will contribute significantly to overall housing need for the area and will play an important role in helping deliver much needed affordable housing and infrastructure. All these strategic sites will be expected to be fully policy compliant with the policies in the emerging Local Plan. As such, they will need to meet the Council's housing mix, environmental and biodiversity standards.

#### CFS26c West of Kings Langley Estate (station side) – 893 dwellings

- 5.2 This is a greenfield site in the Green Belt, currently in agricultural use. It falls within a land parcel assessed in the Stage 2 Green Belt Review that would result in high harm to the Green Belt if removed for development. The site is strategic in scale and its development would support a high level of infrastructure provision. It is considered that the strategic advantages of the site justify the high harm to the Green Belt in releasing the site.
- 5.3 The site is considered to be in a sustainable location with potentially good access to Kings Langley mainline station and as such is considered suitable for higher density development. It has relatively good access to services with local shops and rail station within the lower threshold distance and secondary schools, GP surgeries and open spaces within the upper threshold distance.
- 5.4 The site falls within the Chiltern Beechwoods Special Area of Conservation (SAC) Zone of Influence. Natural England would require further consultation and the provision of Suitable Alternative Natural Green Space (SANG). The site promoters are happy to provide a SANG site adjacent to the development site, designed as a country park with visitor parking, circular walking routes and dog walking areas. New multi-functional open spaces will be created which will be accessible to existing and new communities and could include play areas, formal sports provision, kick about space and allotments.
- 5.5 The site will be required to provide a primary school in line with Hertfordshire County Council's education requirements. There is also potential to provide a health centre on site.
- 5.6 The promoters have stated that there are opportunities to improve bus frequency and provide routing enhancements. A range of new walking and cycling routes would be provided within the site linking to existing walking and cycling routes surrounding the site giving active access to services and facilities. These interventions would be required as sustainable transport mitigations as raised in Hertfordshire County Council's consultation responses. There are also concerns about access to the site due to limited access possible coming from Kings Langley due to the width under the railway bridge.

- 5.7 CFS8d Notley Farm, Abbots Langley – 450 dwellings

- 5.8 The site falls into an area of moderate-high Green Belt harm, and although is below the circa 500 dwelling threshold for strategic sites is being considered alongside the other strategic sites.
- 5.9 The scale of development limits the amount of benefits the site can provide, however it has good access to local services and facilities. The promoters have proposed an extension to Leavesden Country Park as well as improvements to the adjacent allotments. There is potential to provide health facilities on site if needed.
- 5.10 The site falls within the Chiltern Beechwoods Special Area of Conservation (SAC) Zone of Influence. Natural England would require further consultation and the provision of Suitable Alternative Natural Green Space (SANG) to mitigate the effect on the SAC. This can be delivered through the proposed country park.
- 5.11 Access to the site would need to be resolved for the site to come forward, as things stand there aren't the access options to support a development of this scale. Hertfordshire County Council have raised concerns about a lack of sustainable transport options, these would need to be addressed as part of the proposal.

#### OSPF22 Batchworth Golf Course – 618 dwellings

- 5.12 The site is a greenfield site in the Green Belt, the majority of the site falling within an area of high harm within the Green Belt with a small area around the club house assessed as moderate-high harm. The southern portion of the site falls beyond the area assessed in the Green Belt Review, however the Green Belt Review states that any land beyond the areas assessed would be at least high harm to the Green Belt. This portion of the site is proposed for open space rather than built development.
- 5.13 The site is located on the edge of Rickmansworth, the District's principal town as set out in the settlement hierarchy. The Council's spatial strategy aims to focus a higher proportion of development within the principal town.
- 5.14 The site is within walking and cycling distance of Rickmansworth town centre and is therefore considered to be in a sustainable location. The site would have good access to services with secondary schools, shops, and open spaces within the lower threshold. Primary schools, GP surgeries and a rail station within the upper threshold.
- 5.15 The site will be required to provide a primary school in line with Hertfordshire County Council's education requirements. The promoters are proposing community facilities, allotments and public open space to be provided.
- 5.16 The site promoters are proposing to provide housing for the elderly, helping to meet an identified need within the District. The Local Housing Needs Assessment is currently being updated and early results show an unmet need for extracare housing bridging the gap between retirement villages and C2 care homes.
- 5.17 Issues raised through previous consultation responses included Hertfordshire County Council requiring a bus loop into the site making it more sustainable in transport terms. Historic England have concerns about the effect the site would have on the rural setting of Moor Park. Sports England object to the loss of a golf facility which is supported by members of the golf club. The Council's Open Space, Sport & Recreation Study sets out that existing golf course provision is

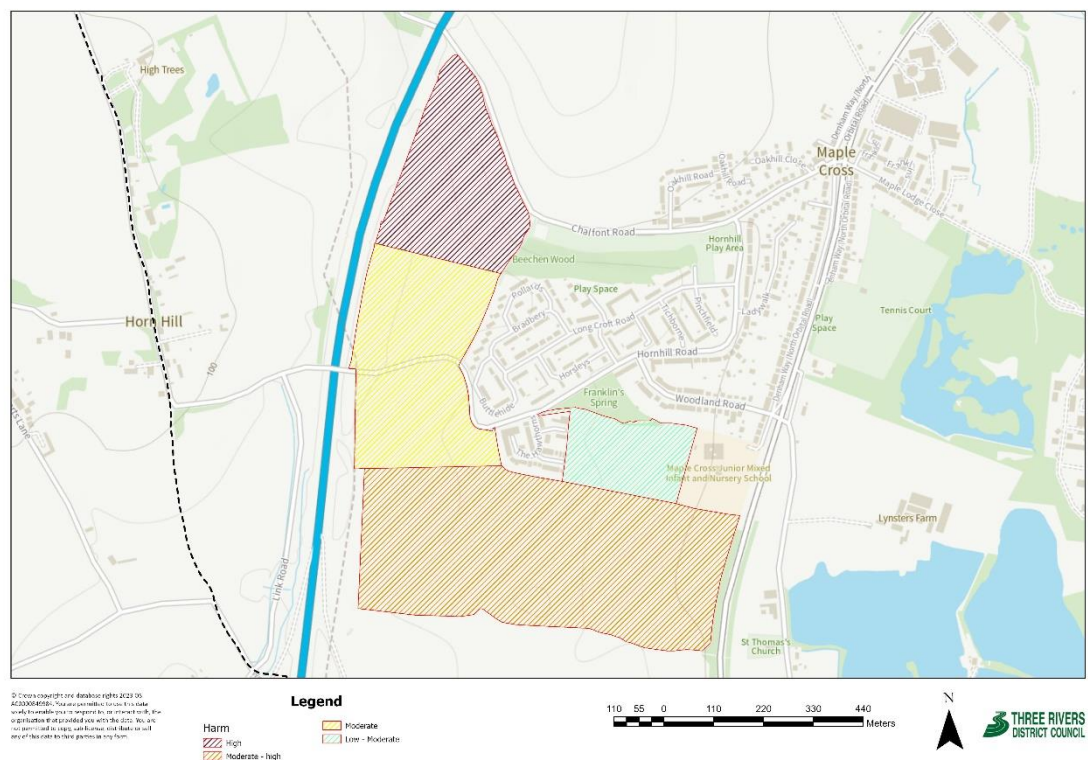


sufficient in the District, however any loss of facilities would need to be addressed. Members of the golf club have raised that there is an existing long-term lease in place. This would need to be resolved prior to the Regulation 19 stage of the plan making process in order for the site to be considered available.

- 5.18 It should be notes that not all of the red line area of the plan would be removed from the Green Belt, with the southern portion of the site proposed as open space.

EOS12.2 Land to the west and south of Maple Cross – 1500 dwellings

- 5.19 The site is a greenfield site within the Green Belt. The site is located in four parcels (please see plan below) which were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the northern part of the site was assessed as high. Harm to the Green Belt of releasing the central part of the site, i.e. the land adjacent to north and south of Hornhill Road, was assessed as moderate. Harm to the Green Belt of releasing the southern part of the site was assessed as moderate-high. Harm to the Green Belt of releasing the north-eastern parcel of the site, adjacent to Franklin’s Spring, was assessed as low-moderate.



- 5.20 The sections of the site that fall within low to moderate harm, shaded in yellow and green on the above plan, would potentially be able to provide 850 dwelling whereas the whole site could provide around 1,500 dwellings. The 850 dwelling number could potentially be further reduced in order to deliver onsite infrastructure provision.

- 5.21 The site promoters are proposing a new local centre benefitting existing (and new residents) in Maple Cross and an extension to the existing primary school in line with Hertfordshire County Council’s requirements. They are also proposing a new and improved public transport service, through extending and enhancing existing routes and a care home.

- 5.22 The development will focus on sustainable and healthy living with a biodiverse network of green infrastructure, public open space including a linear park with enhanced cycle and walking connections.
- 5.23 Officers recommend the full site coming forwards as it is considered that the full range of benefits coming from this scale of development will make the site more sustainable. There is concern that the smaller scale of the site will lead to difficulties in providing the required sustainable transport mitigation in terms of viability reducing the sustainability of the location. The other afore mentioned benefits would also potentially be reduced.

EOS7.0 Land to the south of Shepherds Lane and east of M25 – 550 dwellings

- 5.24 The site is a greenfield site in the Green Belt, falling into an area of moderate Green Belt harm as assessed by the Stage 2 Green Belt Review. As such, it fits into the Council's approach to Green Belt and housing need. The site is strategic in scale and is therefore being considered alongside the other strategic sites.
- 5.25 The site is well contained by existing built development and the M25 motorway. It has good access to services with a secondary school, local shops and open spaces all within the lower threshold. Primary school and GP surgeries are within the upper threshold, and it is also near leisure facilities. A primary school or a GP surgery can be provided on site to meet additional needs created by the site. It is connected by bus to Rickmansworth mainline train station / underground station.

CFS59 Land on London Road – 75 bed care home equivalent to 40 dwellings

- 5.26 The site is not strategic in scale and falls within an area of moderate-high Green Belt harm. As such, it does not meet the agreed approach to Green Belt and housing need. However, the site has potential to come forward together with strategic site OSPF22 Batchworth Golf Course if Members agree to take it forward for consultation.
- 5.27 If the Batchworth Golf Course site does not come forward, then the site should still be considered for inclusion as the care home use would help meet an identified need in the District.

CFS18c Hill Farm Stag Lane – 38 dwellings

- 5.28 The site is not strategic in scale but falls within an area of low Green Belt harm. The previous version of the site covering the full extent of the low Green Belt harm area resulted in only one access point onto a thin lane, and the 150 dwellings proposed on site is considered to be high for the location. As such, the site has been further reduced to focus on the previously developed part of the site around Hill Farm providing 38 dwellings.

**Table 1: Strategic sites recommended for consultation**

Site Ref.	Site Name	Dwellings
CFS26c	West of the Kings Langley Estate (station side)	893
CFS8d	Notley Farm, Abbots Langley	450
OSPF22	Batchworth Golf Course	618

EOS12.2	Land to the west and south of Maple Cross (full site)	1500
EOS7.0	Land to the south of Shepherds Lane and east of M25	550
CFS59	Land on London Road	40
CFS18c	Hill Farm, Stag Lane	38
	<b>Total</b>	<b>4,089</b>

### Strategic Sites not recommended for consultation

#### EOS12.4 Land to the west and south of Maple Cross – 850 dwellings (low to moderate harm sections of the site only)

- 6.1 Site EOS12.4 has been considered in paragraphs 5.13 to 5.17 of this report alongside the full site scheme. Setting out the reasons officers consider that the 1,500 dwelling version of the site (EOS12.2) is being recommended rather than the 850 dwelling version.

#### EOS4.0/PCS21/CFS6 Land adjacent to Bedmond Road & South of M25 Abbots, Langley (combined sites) – 514 dwellings

- 6.2 It was suggested by Hertfordshire County Council that sites EOS4.0, PCS21 and CFS6 be combined in order to offer an improved sustainable transport strategy.
- 6.3 Site EOS4.0 has been withdrawn by the promoter and is no longer considered available. Therefore, there is no longer an option to bring these sites together as a strategic site. Sites PCS21 and CFS26 fall into the low to moderate Green Belt harm group of sites and have already been agreed at the 3 August Local Plan Sub-Committee. Options can still be explored for an improved access and transport solution through the sites' promoters working together.

**Table 2: Strategic sites not recommended for consultation**

Site Ref.	Site Name	Dwellings
EOS12.4	Land to the west and south of Maple Cross (low to moderate harm only)	850
EOS4.0/PCS21/CFS6	Land adjacent to Bedmond Road & South of M25, Abbots Langley	514
	<b>Total</b>	<b>1,365</b>

### New sites submitted

- 7.1 As a result of the Regulation 18 Additional Sites for Potential Allocation consultation five new sites were submitted for the Council's consideration, all of which are in the Green Belt in areas of at least moderate-high Green Belt harm. Another site has been submitted as a result of the Council's call for brownfield sites exercise. The SHELAA forms for these sites can be viewed in Appendix 2.
- 7.2 None of the newly submitted Green belt sites are being recommended by officers to be included in the Regulation 18 consultation on lower numbers.

However, officers are recommending the additional brownfield site to be included as we should be prioritising brownfield development within the urban area where possible.

- 7.3 Site NSS18 Catlips Farm is a large site, but there are a number of site constraints that reduce the developable area. The site is being proposed for 300 dwellings which is not considered strategic in scale. It falls within a moderate-high Green Belt harm parcel and is not within any settlement as defined by the Council's settlement hierarchy, as such it is not recommended for consultation by officers.
- 7.4 Site NSS19 Land north of Russel lane Watford is a small portion of a Watford Borough Council Local Plan allocated site that falls within Three Rivers District. No SHELAA form has been prepared for this site as it did not meet the criteria for inclusion in the Plan. However, when the Council undertakes its Green Belt boundary review this small section could be removed from the Green Belt as all of the neighbouring site in Watford Borough has already been removed and the A41 would form a strong defensible boundary. The site falls within an area of low-moderate Green Belt harm.
- 7.5 Site NSS20 Land adjacent to the RES site falls into an area of High harm Green Belt adjacent to strategic site CFS26c. This site is not considered strategic in scale and has poor access and as such is not recommended for consultation by officers.
- 7.6 Site NSS21 Land between Adams House & Five Oaks, London Rd falls within moderate-high Green Belt harm. The site falls on former garden land and is therefore technically brownfield land within the Green Belt. The site is outside the settlement hierarchy and is 'washed over' by Green Belt, so would result in a pocket in the Green Belt were it to be removed. The site is therefore not supported by officers.
- 7.7 Site NSS22 Lonsdale, 19 Hyde Lane, Nash Mills falls outside of the area assessed by the Stage 2 Green Belt Review, however the Review states that land beyond the assessment area would be at least high harm to the Green Belt. The site is not strategic in scale and is therefore not proposed for inclusion in the consultation.
- 7.8 Site NSS23 Chorleywood Telephone Exchange, Shire Lane, is a brownfield site within the urban area of the key centre of Chorleywood as set out in the Council's settlement hierarchy. It was submitted through the Council's brownfield call for sites and is recommended by officers for inclusion in the Regulation 18 consultation on lower housing numbers. The site promoter has put forwards a very high density for the site which would result in 20-25 dwellings. Officers consider circa 15 dwellings to be more appropriate. This would still be maximising the efficiency of a highly sustainable brownfield site.

## Housing Numbers

**Table 3: Sites recommended for Regulation 18 consultation**

Site Ref.	Site Name	Dwellings
CFS26c	West of the Kings Langley Estate (station side)	893
CFS8d	Notley Farm, Abbots Langley	450

OSPF22	Batchworth Golf Course	618
EOS12.2	Land to the west and south of Maple Cross (full site)	1500
EOS7.0	Land to the south of Shepherds Lane and east of M25	550
CFS59	Land on London Road	40
CFS18c	Hill Farm, Stag Lane	38
NSS23	Chorleywood Telephone Exchange	15
	Brownfield sites (agreed 3 August meeting)	973
	Low to moderate harm sites (agreed 3 August meeting)	907
	Commitments (active planning permissions)	1089
	Windfall allowance	390
	<b>Total</b>	<b>7,463</b>

- 8.1 Table 3 above sets out all the sites recommended for consultation in this report together with the totals agreed at the 3 August Local Plan Sub-Committee meeting. 7,463 dwellings over the 18 year plan period equates to 415 dwellings per annum.
- 8.2 It should be noted that these numbers have been reached using a Green Belt constraint lead approach and not necessarily reflective of the District's housing need figure, which is significantly higher at 637 dwellings per annum calculated using the Government's standard method (11,466 dwellings over the 18 year plan period).
- 8.3 The recommendations in this report together with the sites agreed at the 3 August Local Plan Sub-Committee equate to 65% of the standard method housing target.
- 8.4 As the housing total is so far below our standard method target the Council's approach will be closely scrutinised at examination, so the exclusion of any sites will need to be strongly justified.

### Options and Reasons for Recommendations

- 9.1 The sites recommended in this report, together with those agreed at the 3 August Local Plan Sub-Committee contribute to an approach that would result in a moderate level of growth. Through the Regulation 18 consultations in 2021 and 2023 the Council has already consulted on a high growth option based on the standard method housing need. The low growth option would be no Green Belt land being released at all.
- 9.2 Overall the amount of growth without going into the Green belt would be far too low as we would be unable to meet the needs of the District as required by national policy including affordable housing, housing for the elderly and delivering much needed infrastructure, whereas if we were to meet the standard method housing need in full it would result in unacceptable harm to the Green Belt. It is for this reason that officers recommend a moderate growth approach and the sites recommended within this report together with any strategic sites

agreed at the 24 August Local Plan Sub-Committee would contribute to this approach.

- 9.3 Although officers consider this approach to be justified based on the District's constraints, it should be noted that this moderate growth approach may not be considered acceptable by the Inspector at Local Plan examination. A recent example being the Mole Valley Local Plan examination where the Inspector concluded that the Green Belt sites should be retained in the plan despite the council wishing to remove them following the government's consultation on planning reform.

### Policy/Budget Reference and Implications

- 10.1 The recommendations in this report are within the Council's agreed policy and budgets.

### Financial, Legal, Staffing, Equal Opportunities, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications

- 11.1 None specific.

### Risk and Health & Safety Implications

- 12.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.
- 12.2 The subject of this report is covered by the Planning Policy and Conservation service plan. Any risks resulting from this report will be included in the risk register and, if necessary, managed within this plan.

Nature of Risk	Consequence	Suggested Control Measures	Response (tolerate, treat, terminate, transfer)	Risk Rating (combination of likelihood and impact)
Failure/Delay in delivering Local Plan	Increase in speculative planning applications	Local Development Scheme	tolerate	6
Local Plan found 'unsound' at examination	Main modifications may be required which will result in an extended examination and costs and/or the Plan may have to be withdrawn.	Ensure that the Local Plan is evidenced based and justified	tolerate	6

12.3 The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Very Likely	Low 4	High 8	Very High 12	Very High 16
	Low 3	Medium 6	High 9	Very High 12
	Low 2	Low 4	Medium 6	High 8
	Low 1	Low 2	Low 3	Low 4
Likelihood ↓ Remote	Impact Low -----> Unacceptable			

**Impact Score**

- 4 (Catastrophic)
- 3 (Critical)
- 2 (Significant)
- 1 (Marginal)

**Likelihood Score**

- 4 (Very Likely (≥80%))
- 3 (Likely (21-79%))
- 2 (Unlikely (6-20%))
- 1 (Remote (≤5%))

12.4 In the officers' opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

**Recommendation**

13.1 That the Local Plan Sub Committee:

- Note the contents of this report
- Note the contents of the presentation
- Consider the sites as set out in the presentation against the criteria set out in this report and slides.
- Agree the sites in Table 1 together with the newly submitted brownfield site NSS23.
- Recommend to Policy & Resources Committee the sites to be included in the Regulation 18 consultation on lower housing numbers.

Report prepared by: Marko Kalik, Head of Planning Policy and Conservation

## **Appendices**

Appendix 1 – SHELAA forms – recommended sites  
Appendix 2 – SHELAA forms – not recommended sites  
Appendix 3 – Interim SA report (June 2021)  
Appendix 4 – SA Working Note (January 2023)  
Appendix 5 – Statutory consultee response summaries  
Appendix 6 – Summaries of public comments  
Appendix 7 – District map  
Appendix 8 – Abbots Langley and Kings Langley maps  
Appendix 9 – Chorleywood and Mill End maps  
Appendix 10 – Batchworth maps  
Appendix 11 – Maple Cross maps

## **Background Papers**

National Planning Policy Framework (2021)  
Planning Practice Guidance  
Core Strategy (2011)  
Green Belt Review Strategic Analysis (Stage 1) (2017)  
Stage 2 Green Belt Assessment (2019)  
Regulation 18 Part 1: Preferred Policy Options (2021)  
Regulation 18 Part 2: Sites for Potential Allocation (2021)  
Regulation 18 Part 3: Additional Sites for Potential Allocation (2023)  
Potential Sites consultation (2018)  
Regulation 18 Issues & Options consultation (2017)  
Levelling-up and Regeneration Bill: reforms to national planning policy (2022)  
Strategic Housing & Employment Land Availability Assessment (2020)  
Strategic Housing & Employment Land Availability Assessment Addendum (2023)  
Urban Capacity Study (2020)  
13 June 2023 Local Plan Sub-Committee  
10 July 2023 Local Plan Sub-Committee Briefing Note  
3 August Local Plan Sub-Committee



