## KL&DRA Briefing Note for TRDC Local Plan Regulation 18 consultation Part 4: Three Rivers' Preferred Local Plan Lower Housing Growth Option – Protecting More Green Belt Land

### Have Your Say on the TRDC Local Plan Consultation

Three Rivers Council have revised their approach to the number of homes that need to be built and which sites will be allocated for housing. This approach protects most of the former green belt sites identified in the precious consultation. In Kings Langley the large site at Numbers Farm has been removed but the Flower House site opposite the station is still included.

The public consultation period for the current stage of the Three Rivers Local Plan has now started and runs until Sunday 10 December 2023. It is everyone's opportunity to comment on the Councils' revised approach and the KL&DRA believe it is important for as many Kings Langley residents to respond to the consultation as possible, as this will tell the Council whether the majority of residents agree with their approach or not.

Residents can find details of the consultation at:

#### https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan.

Comments on the Local Plan can also be sent in by post to: Planning Policy, Three Rivers District Council, Three Rivers House, Northway, Rickmansworth, Hertfordshire, WD3 1RL.

For several years, Residents' Associations from across the district, including KL&DRA, have been working together to convince the Council to move forward with a plan with a lower new housing figure than that given by the Government's methodology so as to better protect the Green Belt in the district.

We are delighted that this work has now paid dividends, with the Council now consulting on a plan with much lower proposed new housing levels, less than half the level given by the Government formula, which will massively reduce the amount of Green Belt that will be lost to housing.

Whilst there are concerns about some of the sites proposed, overall, the Residents' Associations strongly support the proposed plan as it achieves a good balance between providing new homes for local people and protecting Green Belt.

Analysis undertaken by the Residents' Associations shows that the district will require between 4,500 and 5,500 new homes to provide for local people over the lifetime of the plan, including allowing more of the younger generations to afford homes in the district. This plan proposes 4,852 new homes and will minimise the amount of Green Belt lost whilst delivering the homes our district badly needs. Through the policies that support this plan, many of these homes will be smaller affordable homes rather than the large mansions many developers prefer.

None of us want to lose any of our precious Green Belt, but Three Rivers is 76% Green Belt and has very little brownfield land that can be built on. Just limiting development to brownfield sites would mean that the district would be unable to provide the homes that are needed for local people.

It would be great if the surrounding districts could provide for the new homes required for our population that Three Rivers cannot accommodate on brownfield land. But they are struggling with the same problems. This means they are either having to build on their own Green Belt / green field land or, as is happening in Watford, building extremely high tower blocks.

The final stage of the process of agreeing this plan will be a Public Inquiry where a Government Inspector will review and challenge the plan to ensure it is fit for purpose. The Inspector can add sites into the plan if they feel it is required – something other nearby councils have experienced recently.

As this plan proposes less than half of the number of new homes given by the government formula, it is likely that the low housing figure and the removal of Green Belt sites listed in the earlier version of the plan will be challenged by the Inspector.

#### The clearer it is that local residents support the proposed Low Growth and Green Belt Restraint approach with its lower housing numbers, the more likely the Council is to be successful in getting this plan approved by the Inspector with the current lower new housing provision.

In summary:

- We support using the lower new home number as providing the full 11,466 new homes would result in the damage to too much of our invaluable Green Belt and would provide more new homes than are required to fulfil local needs.
- The Low Growth and Green Belt Restraint Option put forward by the Council provides sufficient new homes and protects Green Belt whilst the other options suggested would all result in far greater loss of Green Belt to develop new homes the local population do not need.
- We need residents to make it clear to Government Inspectors that this is the right approach for Three Rivers.

We would ask that all residents support the overall plan by replying to this consultation and agreeing to questions 1 and 3, whilst also raising any concerns you have with the individual sites proposed in the later questions.

Following are the key questions from the online consultation response document that affect Kings Langley along with the Association's view on each of them:

Question 1: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. And;

Question 2: Please explain why you agree with the above statement.

The KL&DRA agree and believe the Council has made the right decision to reduce their housing because otherwise, too much of our local Green Belt would have to be built on as there is nowhere else for new dwellings to go. Importantly, this stance means that large Green Belt sites for potential housing in Kings Langley have been removed from the plan, safeguarding Kings Langley as a village. The potential significant increase in size and possible coalescence with Abbots Langley and Bedmond that would place a substantial strain on our infrastructure, transport, schooling and medical resources, has been removed. The significant loss of the Green Belt around our village that preserves its character and historic setting is also prevented. Question 3: Do you agree that the Council's preferred 'Low Growth and Green Belt Restraint' option is the best growth strategy for the District? And;

Question 4: Please explain why you agree with the above statement.

The KL&DRA agree and believe that the Council has taken a reasonable approach by producing a plan with acceptable growth that, whilst it does not protect all of the District's Green Belt, <u>does</u> protect the key Green Belt areas, which if built on, would cause significant harm to villages and settlements around the District.

Question 5: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? And:

Question 6: Please explain why you agree with the above statement.

The KL&DRA agree with the sites not taken forward, not only because two large sites removed were in or adjacent to Kings Langley, but because the reasons the sites have been removed are sensible and proportional. We recognise that the Council is balancing protecting the District's Green Belt with having to provide a reasonable amount of growth by way of sites for new dwellings.

The bulk of the following questions are in relation to whether you agree specific sites should be included in the plan as appropriate development sites. There are two potential sites in Kings Langley:

NSS10: Land at Mill Place, Hunton Bridge. Do you agree this site is an appropriate development site?

# Given that this site is not really in Kings Langley, The KL&DRA agree that this site should be included as it is brownfield land.

ACFS8b: Flower House, Station Road. Do you agree this site is an appropriate development site?

The KL&DRA do not agree that the <u>whole</u> of this site is an appropriate development site. This site is in the Green Belt and was subjected to unlawful development on the undeveloped green field area. We note that the outline of the site in the plan document has not been amended to exclude the undeveloped area. We believe that only the truly original brownfield part of the site is appropriate for development and that the boundary of the site should be redrawn accordingly to exclude and protect the green field area. This part of the site has an enforcement notice to restore it back to its former green field state.

End of briefing note