

Three Rivers District Council Local Plan consultation

CPRE Hertfordshire's initial analysis of Three Rivers District Council Local Plan Regulation 18 Preferred Policy Options Consultation (June 2021)

About us

CPRE Hertfordshire is a local countryside charity. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.

Founded in 1928 we are a grassroots organisation, with 1500 members and a team of 4 part-time staff and a few dozen volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

If you would like to help, then please consider becoming a member or making a donation. Full details can be found on our website. www.cpreherts.org.uk, or please email office@cpreherts.org.uk for more information. Thank you.

CPRE Hertfordshire is a Charitable Incorporated Organisation Registered charity number: 1162419. CPRE holds and manages data in strict accordance with the Data Protection Act (2018). Read our Privacy Policy on our website.

Introduction

This document has been compiled by CPRE Hertfordshire's planning specialists and volunteers. It provides a source of information to help members, local organisations and campaign groups develop their response to Three Rivers District Council's (TRDC) Local Plan - "Preferred Policy Options Consultation – June 2021"

We will publish a more detailed technical report in mid-July which can also be used to support your response.

Comments on the plan can be submitted to Three Rivers District Council by Friday 23rd July, via

- Online consultation portal on the Three Rivers District Council website
- Email to: localplanconsult@threerivers.gov.uk
By post to: Economic & Sustainable Development, Three Rivers District Council,
Three Rivers House, Northway, Rickmansworth, WD3 1RL

General background

- The current stage of the process is a consultation on preferred policy options under Regulation 18 of the relevant Planning Acts.
- There is no obligation for Three Rivers District Council's to include all or any of the proposed provisions in the next, formal version of the Local Plan when it is published.

- Anyone can comment to the Council on any aspect of the consultation and associated documents, in writing, through the Council’s Consultation Portal or by email or post. Although the Council has asked you to respond to specific question on each policy and site, there is no requirement to do so as long you specify the policy or site to which you are responding.
- The Council must consider all comments made that are relevant to the proposed Local Plan, before deciding what to include in the next version, also known as the publication stage Local Plan.
- The publication stage Local Plan will then be subject to a minimum 6-week consultation during which anyone can make representations on whether or not the Plan is ‘sound’ as defined by Local Plan Regulations.
- Any such representations that the Plan is unsound or not legally compliant will be considered by a Planning Inspector during a subsequent public examination of the proposed Plan.

Our point of view

CPRE Hertfordshire believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan.

CPRE Hertfordshire believes that planning is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily. More new homes are undeniably needed and there is plenty of scope to use previously developed urban land (i.e., “brownfield”) to help address this need.

Our primary concerns

We have several concerns about the proposed “Preferred Policy Options Consultation – June 2021” which are listed below.

This note has been prepared by the CPRE Herts planning team to provide an initial source of information to help members and local groups to develop their responses to Part 1 of the Three Rivers District Council (TRDC) Preferred Policy Options (PPO) document. We do not intend to comment in detail to Part 2: Sites for Potential Allocation as we will focus on strategic concerns, but we encourage all members and interested parties to comment on specific sites of concern.

Impact on designated protected areas; including Green Belt (GB) and Chiltern Area of Outstanding Natural Beauty (AONB)

76% of Three Rivers District is designated as Green Belt and it also contains 546 hectares of the Chilterns AONB and 159 nationally and locally designated environmental sites. These are key characteristics of the district and contribute massively to the quality of life of residents and visitors. Despite the statement in paragraph 8.3 in the PPO document that “great importance is attached to the Green Belt in Three Rivers”, 8,973 additional houses are identified as being necessary of which 80% are allocated to sites previously in the Green Belt.

Lack of protection of Green Belt and Chilterns Area of Outstanding Natural Beauty (AONB) as a Strategic Objective for the Local Plan

With more than three quarters of the land area of the District being Green Belt, it is unacceptable that its protection is not regarded as a Strategic Objective for the Local Plan. A basic characteristic of the Green Belt is its permanence, and it should be regarded as a principal constraint to development and a huge asset for the District to be protected and enhanced for the benefit of everyone, both residents and visitors alike. The minimal treatment of this major land use is a significant failing of the Local Plan which inappropriately favours new housing provision in protected areas.

Overprovision of housing

CPRE accepts there is a need for housing in Three Rivers as elsewhere, especially truly affordable housing for young and older households, but the projections used in the Local Plan are excessive and out of date. The PPO document uses 2014 data from the Office for National Statistics (ONS) and we firmly believe that the latest projections, currently available for 2018 and shortly to become available for 2020, should be used, as these show a projected decrease in new households in the District for the plan period, and therefore a reduced number of houses which should be planned for. The Council has also failed to take account of the National Planning Policy Framework (NPPF) paragraph 11, footnote 6, which allows local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and AONB.

Failure to address climate change

TRDC declared a Climate Emergency in May 2019 and the Local Plan is the key mechanism for the Council to implement the requirements of this declaration. Although Strategic Objective 9 identifies climate change issues in the most general terms, the PPO clearly prioritise housing provision and greenfield land development over such considerations. Despite the requirements of the NPPF and 2004 Planning and Compulsory Purchase Act 2004 and subsequent legislation, the proposed policies fail to take account of the need for carbon reduction targets and sustainable transport provision, amongst many other concerns, and a carbon reduction pathway is needed to meet national obligations for net zero emissions by 2050.

Inadequate provisions for water supply and wastewater disposal

The level of new housing proposed is expected to put severe strain on water supplies to Three Rivers during the 2020s under drought conditions, and further pressure will be put on chalk aquifers and affect the rivers which give the District its name. Similarly, the growth proposed will put undue stress on waste water and sewage networks and substantial infrastructure investment will be required in the next ten years, which is not specified.

Loss of biodiversity

Strategic Objectives 11 and 12 make passing references to the issue of biodiversity as an asset but mainly as a setting for development and opportunities for recreation and leisure. This is a wholly inadequate response to the legislation regarding net biodiversity gain, which will become increasingly significant in the future. No specific policies are proposed for this critical area in the Local Plan, which is an unacceptable omission.

Underestimation of the opportunities for regeneration and reuse of land

The reuse of previously developed land is considered mainly in terms of the release of Green Belt land and some urban sites, which greatly underestimates the likely changes which are already affecting town centres, out of town centres retailing and commercial uses more generally. The impact of the pandemic and projected social and economic trends are likely to create many more opportunities for the conversion of commercial and other space to residential use and changes in the form and function of workspace which are not taken into account in the Local Plan. A more positive place making strategy is needed as part of a formal brownfield land review to realise local enhancement of the existing built environment with benefits for existing and new residents.

Next steps

As mentioned earlier, this is our initial review of the Preferred Policy Options and we are now working on more detailed technical review which we hope to issue in mid-July, ahead of the closing date for the consultation.

While we will not be commenting on individual sites, we will be commenting on the issue of Bedmond “green washing” in our second report.

In order to inform your own submissions we would encourage you to look at the document “Part 2 Sites for potential allocation final changes 140621” and in your response comment on any specific sites that concern you.

CPRE Hertfordshire
30 June 2021

APPENDIX1: CPRE Hertfordshire site assessment – high level review

The following tables provide a high-level review, by primary location, of the impact of the proposed local plan.

CPRE Herts Site Analysis by settlement - based on proposed Three Rivers Local Plan Reg 18 Sites for Potential Allocation (June 2021)										
Proposed Allocations	Hectares total	Hectares Green Belt	Hectares Brownfield in Green Belt	Hectares Greenfield/ Green Space	Hectares Brownfield	Dwellings total	Dwellings Green Belt	Dwellings Brownfield in Green Belt	Dwellings Greenfield/ Green Space	Dwellings Brownfield
Abbots Langley & Leavesden totals	49.16	47.42	0	0	1.74	1856	1736	0	0	120
Garston totals	5.1	5.1	0	0	0	153	153	0	0	0
Garston total	5.8	5.8	0	0	0	190	190	0	0	0
Kings Langley totals	1.7	0	1.7	0	0	81	0	81	0	0
Langleybury totals	1.97	0	1.97	0	0	25	0	25	0	0
Croxley Green totals	12.48	0	1	0.27	11.21	670	0	133	17	520
Rickmansworth totals	24.49	18.6	0	0	5.89	1053	658	0	0	395
Mill End totals	21.72	20.8	0	0.17	0.75	817	760	0	12	45
Chorleywood totals	11.25	8.45	0.2	0	2.6	522	302	10	0	210
Maple Cross and West Hyde totals	57.06	57	0	0	0.06	1783	1778	0	0	5
Moor Park and Eastbury totals	0.5	0	0.5	0	0	35	0	35	0	0
Oxhey Hall totals	3.62	2.8	0	0.33	0.49	179	133	0	8	38
South Oxhey totals	2.14	0	0	0	2.14	110	0	0	0	110
Carpenters Park totals	39.2	38.3	0	0	0.9	1499	1431	0	0	68
Employment totals	11.5	11.5	0	0	0	0	0	0	0	0
Warner Bros Studios at Leavesden totals	28	28	0	0	0	0	0	0	0	0
Proposed Education total	10.7	8.2	0	2.5	0	0	0	0	0	0
Three Rivers Local Plan - TOTALS	286.39	251.97	5.37	3.27	25.78	8973	7141	284	37	1511
	Hectares total	Hectares Green Belt	Hectares Brownfield in Green Belt	Hectares Greenfield/ Green space	Hectares Brownfield	Dwellings total	Dwellings Green Belt	Dwellings Brownfield in Green Belt	Dwellings Greenfield/ Green space	Dwellings Brownfield

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Table 1 – Summary of site analysis by settlement