

**Standing up for Hertfordshire's countryside**

Claire May  
Head of Planning Policy & Projects  
Economic & Sustainable Development  
Three Rivers District Council  
Three Rivers House  
Northway  
Rickmansworth  
Herts WD3 1RL

Our Ref:

Your Ref:

5<sup>th</sup> December 2018 (by email)

Dear Ms May,

**Three Rivers Local Plan: Potential Sites Consultation Document 2018**

Thank you for consulting us on the above document.

We are not able to comment specifically on the Planning merits and demerits of the individual sites identified by the Council and included in the document, but we do wish to comment on the way the sites have been presented for comment and on the Introduction, as set out below.

Firstly, both your consultation email dated 26 October 2018, and the consultation itself, fail to make any reference to the publication in September of vitally important information essential to the Council's consideration of development site proposals in the District. For the District as a whole, 2,000 fewer households are projected by the Office for National Statistics (ONS) to exist in 2036 than assumed when the Council calculated its housing need figure earlier this year. That is a 25 percent reduction. This omission is important because the 'Introduction' to the potential sites consultation on pages 4 and 5 highlights housing need figures, and national planning policy on how this is to be calculated, that we consider are now effectively out of date.

Secondly, the Introduction misleadingly implies that full housing need must be planned for, which is untrue by virtue of paragraph 11 of the new NPPF. We therefore consider that the Council has described a misleading context for the consultation, which is dominated by landowner and developer promoted sites in the Green Belt, which is the most important constraint listed under NPPF paragraph 11 and its footnote.

Thirdly, the maps used to show the individual sites and groups of sites around specific settlements fail to show the areas defined as nationally important policy designations and constraints (NPPF paragraph 11 and footnote 6), including areas of flood risk, SSSI, heritage assets, and Green Belt. This is a serious omission from a document that is inviting consultees to comment on the suitability of individual sites for potential allocation in the Local Plan, especially when the Council does not intend to provide any further opportunity

for public consultation on the Plan before it is published for formal representations. There are limited references to some constraints in the text for some sites, but no means by which consultees can see the extent, or assess the relevance of these.

Fourthly, there is no map or maps provided to show the cumulative effect of allocation of individual or groups of sites, particularly in respect of neighbouring settlements within the District and beyond the District boundary. We consider this to be a major oversight.

We would urge the Council to amend the consultation website to state that the references to housing need in the consultation are subject to review as a result of new information.

We also suggest that the Council identifies and provides a link or links to map-based information on nationally designated policy areas for consultees to study before commenting on potential sites and groups of sites.

Finally we urge the Council to create and publish a map on an OS base of all the sites included in the consultation, that also shows neighbouring built up areas and the sites close to the District boundary that the neighbouring Councils are considering for allocation in their own Local Plans.

Without the above steps we consider that the reliance that can be placed on the results of the consultation will be reduced, and that there is likely to be a greater level of opposition to individual, and groups of Local Plan proposals, because of the lack of relevant information provided in the current consultation document.

Yours sincerely,

Steve Baker  
Planning Manager