



Three Rivers District Council
Local Plan Regulation 18 - Part 3 Consultation
Additional Sites for Potential Allocation
CPRE Hertfordshire Comments

By Chris Berry, Planning Manager

Date: 8th March 2023

1. In responding to the Part 3 Regulation 18 consultation, we are aware and welcome the record-breaking number of responses to the Regulation 18 consultation (Parts 1 and 2). These demonstrated the local communities' strong opposition to the allocated Green Belt sites for residential and other development.
2. We welcomed the 'pause' of the emerging Local Plan, particularly in the light of the recent and repeated Government statements pledging protection of the Green Belt. In addition, the potential Government response to the National Planning Policy Framework (NPPF) Prospectus publication is likely to result in amendments that give more flexibility to local planning authorities in their calculation of future housing need, and more flexibility where there are 'genuine constraints' such as Green Belt to not fully meet that need.
3. Most recently the Secretary of State for Levelling Up, Housing and Communities published a Statement on 6th December 2022 which noted "It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area – be that our precious Green Belt or national parks" (Hansard: Planning System and Levelling Up Bill: Community Control. 6.12.22).
4. Further, the NPPF Prospectus includes amendments which remove any requirement for local planning authorities to review Green Belt boundaries in order to accommodate housing need calculated on the basis of either the standard method or an alternative method.
5. The Secretary of State also said, in his letter to all MPs dated 5 December 2022 "The effect of these changes will be to make absolutely clear that Local Housing Need should always be a starting point – but no more than that – and importantly, that areas will not be expected to meet this need where they are subject to genuine constraints."

6. Accordingly, we are concerned that the Council feels the need to consult on further potential sites in the Green Belt in advance of both the anticipated NPPF amendments, and a comprehensive further Regulation 18 consultation which takes account of local community concerns. This appears to be an unnecessary additional stage in the process.
7. Section 2 of the Part 3 consultation re-states the target of 12,624 dwellings based on the Government's standard method, when it is widely anticipated that this approach to calculating housing need will be superseded. In any case, as we have noted previously, housing need figures based on the standard method are not based on the most up-to-date population and household projections, and we urge the Council to join other local planning authorities in challenging the use of out-of-date projections which unnecessarily inflate potential housing requirements.
8. CPRE Hertfordshire welcomes the Council's intention as expressed by Cllr Giles-Medhurst in the Foreword that the Council is committed to a reduction in housing numbers required in the new Local Plan proposal. We look forward to responding to the amended Local Plan later in the year.
9. With regard to the specific proposals in Part 3, we clearly welcome any reduction in sites allocated within the Green Belt, and the use of brownfield and previously developed land. We oppose large-scale proposals in the Green Belt and the inseting of villages presently washed over by Green Belt.

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