

## Three Rivers Part 4 Local Plan Regulation 18 Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land (October 2023)

### CPRE Hertfordshire response to the consultation survey

**Q.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 due 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?**

Yes.

**Q.2 Please explain why you agree with the above statement.**

CPRE Hertfordshire agrees 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.

CPRE, both nationally and locally, has campaigned vigorously for a more appropriate formula for assessing future housing requirements than the 'Standard Method' of calculating housing need. This uses nationally derived data and criteria for household projections but takes no account of local conditions and leads to inflated results for housing need in local planning authorities throughout the country

As noted in the consultation document, the Standard Method uses 2014 based household projection figures which are out-of-date and do not reflect the recent reduction in rates of household formation. They provide a misleading indication of future housing needs and it is widely accepted that this is now unacceptable.

The situation is particularly unacceptable in areas where the majority of open land in a local planning authority area is designated as protected (Green Belt and AONB). This applies equally to Three Rivers as well as neighbouring districts and boroughs in south Hertfordshire, where public services and facilities are under increasing pressure.

The Government has indicated that amendments will be made to the NPPF regarding the use of the Standard Method, and specifically to maintaining the existing boundaries of the Green Belt. We await the Government's publication of a revised NPPF which may enable the Council to revise its projections and housing targets further.

Whilst the Council continues to apply the Standard Method calculation in the Part 4 Local Plan, it acknowledges that the resulting housing target is too high and does not represent the actual development needs for the area. We would urge the Council to further review its housing need calculations and housing targets as soon as these long overdue amendments are published.

We are pleased to note that the Council has taken full cognisance of the National Planning Policy Framework (NPPF) in applying the policy test introduced in the NPPF paragraph 11 and footnote 7 relating to local conditions. This test indicates that housing need may be assessed against policy constraints that include a range of protected land designations, including Green Belt and Areas of Outstanding Natural Beauty, which may be applied to produce a housing target for inclusion in the Local Plan.

The Council has applied the policy test in areas where development would cause “very high, high and moderate-high harm” to the Green Belt as assessed in the Stage 2 Green Belt Review. This has the effect of reducing very considerably the amount of Green Belt which is proposed to be released, from nearly 250 to 57 hectares.

**CPRE Hertfordshire fully supports the Council’s approach in applying NPPF paragraph 11 and footnote 7 in assessing housing need against Green Belt policy constraints.**

It should lead to a re-assessment of housing need and housing target figures in all local planning authorities with a high proportion of designated protected land. The Council joins 60 other local planning authorities in England reviewing their position regarding the calculation of future housing requirements.

The Council has not applied the policy test to the whole of the Green Belt in the District, which would be our preferred position, but has concentrated on where most harm would be caused.

The Part 4 Local Plan suggests that 988 dwellings can be accommodated on previously developed land (brownfield land) within the plan period and we believe that this may be an under-estimate and would press the Council to re-assess opportunities for re-development. It may be necessary to re-consider the criteria used for urban capacity and similar studies, and the potential role of windfall sites.

CPRE campaigns nationally for the use of previously developed sites before any other land is considered.

**Q. 3 Do you agree that the Council’s preferred ‘Low Growth and Green Belt Restraint’ option is the best growth strategy for the District?**

Yes.

**Q. 4 Please explain why you agree with the above statement.**

CPRE Hertfordshire agrees strongly that the Council’s preferred “Low Growth and Green Belt Restraint” strategy is appropriate.

We believe that it is critical that the commitment to the permanence of the Green Belts is maintained in planning policy, with alterations only taking place in exceptional circumstances, as presently noted in the NPPF. Green Belt policy continues to be effective in preventing urban sprawl, and at present, the rate of development in Green Belt exceeds significantly that in other protected landscapes, such as National Parks and AONB.

The Council notes that the acute need for housing, especially for affordable homes in high cost areas such as Three Rivers, “cannot be addressed at the cost of harming existing communities and resulting in unacceptable harm to the Green Belt” (paragraph 2.3). In our extensive experience of reviewing residential proposals in Hertfordshire, development in the Green Belt appears never to address the need for truly affordable homes.

It is increasingly accepted that the existing methods of attempting to achieve affordable housing through the imposition of planning obligations on private developers are failing to make any appreciable impact on the problem. Initial commitments by developers for affordable housing are frequently revised downwards, generally for reasons of viability which are in some cases questionable.

The largest proportion of proposals, in terms of units, for residential development on Green Belt are made by volume house-builders for sale on terms significantly in excess of average household incomes in the County. Developments in the Green Belt are land-hungry and analysis by CPRE of thirteen recently developed Green Belt projects showed that only 5% of the housing built was “social housing” (under the present definitions) which was significantly less than that called for by local planning policy in all cases (CPRE State of the Green Belt Report 2023; London 2023).

The advantages of the Green Belt are readily understood and appreciated. The Green Belt is the countryside next door for millions of people, especially in southern Hertfordshire where it provides crucial breathing space for the metropolis. The physical and mental health benefits of the Green Belt were recognised widely during the recent pandemic. Residents and visitors alike discovered countryside nearby that they did not know existed.

Green Belt land provides a vital space for nature and recreation and includes a significant number of our nature reserves, as well as double the national density of public rights of way, providing success for all. Through the protection and enhancement of Green Belt land, we can increase its natural and recreational values, as well as providing a natural solution to the climate emergency through carbon sequestration.

Crucially, the defining feature of the Green Belt is its permanence, the assurance that it will be maintained for generations to come. CPRE Hertfordshire commends the Council’s proposals to maintain the protection of this highly valued countryside.

**Q. 5 Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development?**

Yes.

**Q. 6 Please explain why you agree with the above statement.**

CPRE Hertfordshire agrees that the sites detailed in Appendix 1 should not be proposed for development as a result of taking account of the policy issues regarding designated protected land.

We believe that the position taken by the Council could have significant consequences for the future allocation of Green Belt sites for housing in Hertfordshire and elsewhere. If this approach is accepted by the Government it will strengthen further the protections offered by Green Belt designation with huge benefits for local communities and beyond.

**Q.107 Do you have any comments on the Sustainability Appraisal working note accompanying this consultation**

The Sustainability Appraisal working note provides the justification for the promotion of the “Low Growth Option” and presents the standard criteria for the assessment of sustainability.

It is clear that the primary criterion applied is the harm caused to the Green Belt. Very few other criteria indicate significant variation between the options considered.

**Accordingly, we support the findings of the Sustainability Appraisal working note.**

CPRE Hertfordshire  
6<sup>th</sup> December 2023