

[REDACTED]
[REDACTED]
Place Shaping and Corporate Performance
Watford Borough Council
Town Hall
Watford
WD17 3EX

My Ref : DCES/CM
Your Ref :
Date : 6 March 2020
Contact : [REDACTED]
Tel No : [REDACTED]
Email Add : [REDACTED]

Dear [REDACTED]

Three Rivers District Council

Three Rivers District Council is currently progressing work on its Local Plan which will cover the period 2016 to 2036.

The standard method for assessing local housing need has resulted in an annual requirement of 624 homes per annum. By comparison our current Local Plan, which was adopted in October 2011, has an annual housing requirement of 180 homes. That plan is now more than five years old and therefore deemed to be 'out of date' in determining our future strategic growth requirements.

Our Strategic Housing Land Availability Assessment and Urban Capacity Study indicate that less than 3,600 homes can be accommodated on land not designated as Green Belt. This includes dwellings that have been completed since 2016, existing commitments, a windfall allowance and the existing site allocations without planning permission. With regards to employment needs, we are confident that existing commitments will meet our office (B1 Use Class) requirements but there is an identified need for approximately 7ha of land for industrial/warehouse use (B1c/B2/B8 Use Class) which cannot be accommodated on land not designated as Green Belt.

As there is a very significant shortfall between the potential housing capacity of Three Rivers' previously developed land and the level of identified need as well as a clear deficit of land required to meet employment needs over the plan period, we need to consider the principle of reviewing the Green Belt boundary to accommodate that need.

The National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered in 'exceptional circumstances' and these have to be fully evidenced and justified and that before concluding that 'exceptional circumstances' exist a plan making authority needs to demonstrate that it has examined all other reasonable options.

The examination of the Local Plan will assess whether 'exceptional circumstances' has been fully evidenced and justified by the evidence base and will also consider whether the Plan's strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land
- Optimises the density of development through policies that promote a significant uplift in minimum density standards.

Given these requirements and to ensure that previously developed land is maximised, we have set out to:

- Review the housing densities and capacities of all potential sites located within settlement boundaries
- Apply a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- Assess the utilisation of local vacant housing stock
- Review the achievability and deliverability of Three River's own land assets.
- Contact owners/occupiers of potential brownfields sites who have not yet submitted any of their land holdings
- identify opportunities in established uses within the settlement boundaries (e.g. under-used garage blocks)

In addition to the above the NPPF requires that our Plan has been informed by discussions with neighbouring authorities about whether they could accommodate some of the need for development.

As an authority with 76% of its area designated as Green Belt we are asking you whether your authority is able to accommodate some of the growth shortfall identified in Three Rivers. A similar request has been sent to all our neighbouring authorities and other authorities within our Housing Market Area.

We will be contacting you to arrange further Duty to Cooperate meetings in the coming weeks to discuss our emerging plan and potential cross boundary issues arising.

I would be grateful for a response to this letter at the earliest opportunity. If you have any queries relating to the above request, please do not hesitate to contact me.

Yours sincerely

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████████████████████ Planning Policy & Projects
Three Rivers District Council