

Planning & Development Committee

Agenda Item PD4453/23

Regulation 18 Consultation on the Local Plan (Part 4)

Context

Three Rivers District Council (TRDC) is consulting on a "Preferred Local Plan Lower Housing Growth Option – Protecting Green Belt Land". Croxley Green Parish Council (CGPC) has responded to previous consultations in more or less detail at the various stages of development of the Local Plan. This paper proposes a response for discussion and approval.

Discussion

The existing local plan was approved in stages between 2011 and 2014. Local authorities are expected to review and replace their Local Plans on a 5 year cycle to reflect changing circumstances.

TRDC commenced this cycle of review in 2017 with a public consultation on Local Plan issues and a Call for Sites (for development). CGPC responded with a brief letter (copy attached at Annex A).

TRDC issued an Additional Call for Sites Consultation in August 2018 and consulted on Potential Sites for Allocation in October 2018. CGPC responded with brief letter (copy attached at Annex B)

TRDC issued a consultation on the Preferred Policy options and the Sites for Potential Allocation in June 2021. CGPC responded with detailed comments:

- A covering letter (Annex C)
- Comments on preferred policy options (Annex D)
- Comments on certain potential sites for development (Annex E) &
- Statement by Jed Griffiths, MA DipT FRTPI on behalf of CGPC (Annex F)

TRDC apparently received over 20,000 separate responses.

In January 2023 TRDC issued a supplementary consultation on a small number of additional sites submitted as a result of the 2021 consultation.

As a result of the overwhelming response to the 2021 consultation, TRDC has developed a new option for lower housing growth and protecting the green belt. This proposed new option is very much in line with the comments submitted previously by Croxley Green Parish Council. However it does not follow Government guidance (which is currently under review, and may be changed) on the level of new housing that should be provided. If this new approach is to succeed, TRDC needs evidence that the majority of the population support the low growth option.

I spoke on behalf of CGPC at the Local Plan subcommittee on 03 August 2023 on two points:

- The future of the Red Cross Centre, and

- The future of the Croxley Rail Link / Metropolitan Line Extension, sites at 33, Baldwins Lane and Cinnamon House, Cassiobridge.
Speaking notes at Annex G.

The topics for discussion are set out in Appendix 1.

A draft response is set out in Appendix 2.

Recommendation

It is proposed that:

- The Council responds to the consultation as set out in Appendix 2

Cllr Andrew Gallagher
02 November 2023

DRAFT FOR REVIEW

APPENDIX 1 THE ISSUES TO BE CONSIDERED

The consultation asks three “key” questions:

- Do we support the method for calculating the district’s housing need?
- Do we agree that this is the best growth strategy for the District?
- Do we agree with the sites that are not being included in the plan?

It also asks for our views on

- The individual sites being proposed.

The Government set out a method for calculating the number of new homes required in each district, based on the ratio of the average cost of homes in the district and the average income. This produces a very high figure for somewhere like Three Rivers.

The repeated “calls for sites” showed that Three Rivers was having great difficulty finding anywhere to build the houses without taking land out of the green belt. Watford solved the problem by permitting very high tower blocks.

The method predicted 12,624 new homes required were over the plan period to 2038. Croxley Green currently has about 5,500 homes. That meant Three Rivers would need to build two new settlements, both larger than Croxley Green, over the next 15 years.

According to National Statistics there were 38,422 dwellings in Three Rivers in March 2021. An additional 12,624 dwellings would be a one third increase. The consultation in 2021 proposed potential housing allocations for a total indicative capacity of 8,973 dwellings.

In response to the comments received from the residents, the Residents’ Associations, and others including CGPC, TRDC has developed an approach based on using as much “brownfield” land as possible (that is re-using land previously developed) and releasing small areas of green belt where development will do least harm to the green belt.

This would provide for 4,852 homes over the period (less than the standard method target which is now 11,466) and protect 98% of the green belt from development.

KEY QUESTIONS:

Logically, CGP should SUPPORT

- **the method for calculating the district’s housing need and**
- **the “Lower Housing Growth Option – Protecting Green Belt Land” approach.**

Only ONE site in Croxley Green is being taken out of the Plan.

This is the amenity land adjacent **64-82 & 99-121 Sycamore Road** (map below).
In our previous response we stated:

“A full statement of the reasons has been prepared on our behalf by Jed Griffiths and we fully endorse the reasons for our objection set out in the attached statement.

Site CFS19 is not suitable for any development. It provides an important open space for residents and the local community. It was specifically planned and designed for this purpose in the original 1962 estate and surrounding houses. The site continues to fulfil this function and a number of trees have been afforded protection on the boundary and within the site underlining its importance as open space.

Four times planning permission has been applied for and four times it has been REFUSED:


- 1969 W 1487 69 - application for 9 flats and garages REFUSED appeal DISMISSED
- 1993 8/163/93 - application for 12 flats in 2 blocks REFUSED appeal DISMISSED
- 2005 05/1055/OUT - application for 8 flats REFUSED appeal DISMISSED
- 2020 20/2737/FUL - application for 6 flats and 3 houses REFUSED

Croxley Green Parish Council OBJECTS to this proposal in the strongest possible terms.”

Since the 2021 consultation a further Appeal has been DISMISSED.

Therefore, we should support the decision to remove this from the site allocations.

Croxley Green

Site Ref.	CFS19	Site	Land adjacent 62-84 & 99-121 Sycamore Road	Size (ha)	0.27
					
Current use				Greenfield	
Dwelling Capacity				17	
Phasing				1-5 years	
Green Belt				No. Brownfield garden land.	
<p>Reason for removal: Removed following planning appeal decision supporting the council's refusal of development and loss of amenity land.</p>					

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SITE ALLOCATIONS IN CROXLEY GREEN

Six sites are included in the site allocations:

- CFS20: Land at Croxley Station Watford Road
- CG16: Garages off Owen's Way
- CG47: Garages off Grove Crescent
- CG65: British Red Cross Community Way
- H9: 33 Baldwins Lane (Croxley Car Centre)
- CFS61: Cinnamon House, Cassiobridge

CFS20 Land at Croxley Station, Watford Road

CGPC commented in 2021:

"Croxley Green Parish Council accepts that this is a suitable site for redevelopment and draws attention to the aims in the adopted Neighbourhood Plan.

Any proposed development should be the subject of a detailed planning brief devised by TRDC in association with the Parish Council to ensure that the major mixed use redevelopment at the heart of the Parish, which includes the approved Housing Allocation, will also include community and commercial uses which complement or enhance existing facilities in the Parish.

Any redevelopment requires a detailed planning brief and masterplan because this is such a complicated and sensitive site at the heart of Croxley Green. The lower floors will probably need to include commuter parking and parking for the residents.

The number of units proposed looks very high and this should be re-assessed on the basis that the height of the buildings should not be excessive, i.e. no more than 4 stories in total above road level with the top level being built into the roofs.

If by the time this development take place there is still a requirement for a new medical centre, then this should be included as part of the redevelopment of this site.

Conflict between providing adequate parking for commuters and additional high density dwellings. Dwelling capacity has been INCREASED from current plan. Suitable for redevelopment, but number of dwellings should be reviewed.

There are two opposing pressures: encouraging the use of trains as opposed to cars, which implies provision of adequate parking in the environs of the station, and providing housing on otherwise underutilised land.”

CFS20: Land at Croxley Station Watford Road

Site Ref.	CFS20	Site	Land at Croxley Station Watford Road	Size (ha):	2.3
				Current Use	Station, station car park & timber yard
				Dwelling Capacity	163 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
<p>Comments</p> <p>The southern area of the site is an existing housing allocation in the Site Allocations LDD (adopted 2014) (Site H13). Any development would be required to provide suitable mitigation to address surface water flood risk. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Potential noise and vibrations caused by the use of the station/railway line would need to be addressed through mitigation measures. The site would be required to provide open space and play space. The station use would remain as part of any development and proposals would need to safeguard parking provision for the station.</p>					

This revised allocation includes building OVER the railway lines (not included in the current Site Allocations LDD, 2014).

Therefore, we should support the inclusion of this site, with similar comments about the development of the site.

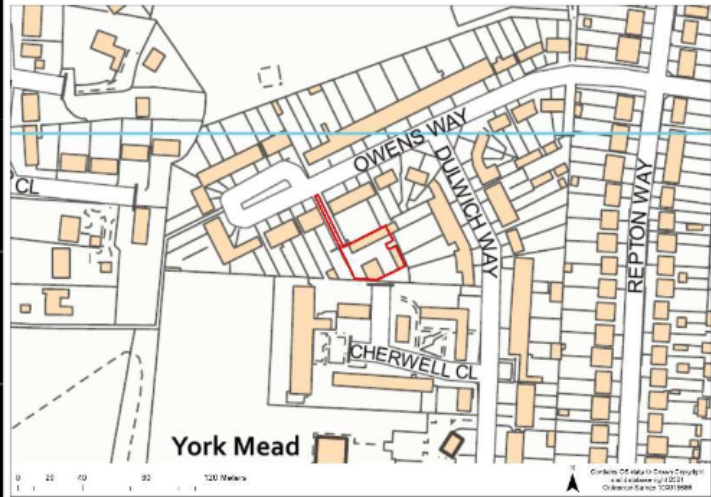
We might ask why open space and play areas are required when Barton Way recreation area and playground is relatively close by (a short walk across Winton Drive and up Springfield Close) and Croxley Common Moor is also a relatively short walk via Mill Lane.

CG16: Garages off Owen's Way

CGPC commented in 2021:

"This is a tiny site (0.09 hectare) with cramped access and a surface water flooding problem. The current garage provision is inadequate for current motor vehicles and the site could usefully be redeveloped to provide additional parking space with electric vehicle charging and safe storage for bicycles, electric scooters, etc."

CG16: Garages Owen's Way

Site Ref.	CG16	Site	Garages Owen's Way	Size (ha):	0.09
				Current Use	Garages
				Dwelling Capacity	6 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site and suitable access arrangements would need to be achieved.					

Therefore, we might make similar comments on this occasion, or decide to support the inclusion.

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CG47: Garages off Grove Crescent

CGPC commented in 2021:

“This is a more substantial area of land (0.26 hectare) within a well laid out development. The current garage provision is inadequate for many current motor vehicles and the site could usefully be redeveloped, subject to a masterplan to identify what is feasible within the current setting. The requirement to provide open space and play area within such a small site is probably unfeasible.”

CG47: Garages off Grove Crescent

Site Ref.	CG47	Site	Garages off Grove Crescent	Size (ha):	0.26
				Current Use	Garages
				Dwelling Capacity	19 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
<p>Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site. The site is close to public open space, so onsite provision would not be required.</p>					

TRDC appears to have accepted our comment about provision of open space and play area.

Therefore, we might make similar comments and support the inclusion.

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CG65: British Red Cross Community Way

CGPC commented in 2021:

“Totally unacceptable.

A full statement of the reasons has been prepared on our behalf by Jed Griffiths and we fully endorse the reasons for our objection set out in the attached statement.

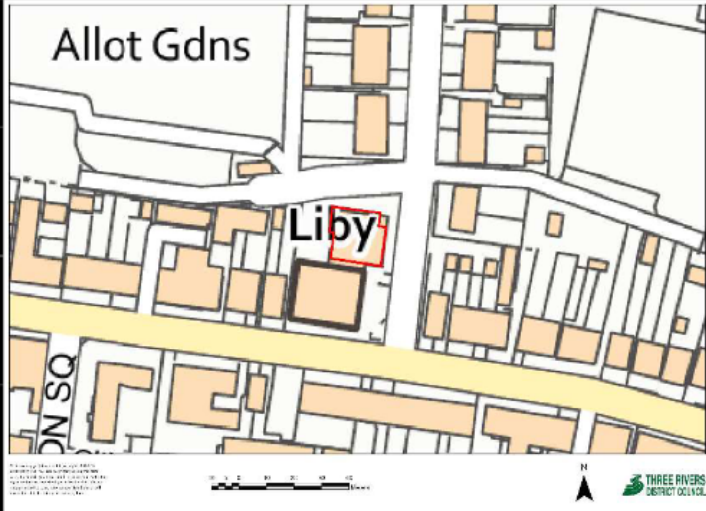
This is a community asset, and should not be treated as a commercial site. This is a community site and must be kept as it is now to be improved and used for the community.

The Parish Council has promoted a petition to save the building for the community which has been signed by more than 840 people.

Croxley Green Parish Council OBJECTS to this proposal in the strongest possible terms.”

[See also the statement by Jed Griffiths]

CG65: British Red Cross Community Way

Site Ref.	CG65	Site	British Red Cross Community Way	Size (ha):	0.06
				Current Use	British Red Cross building
				Dwelling Capacity	6 - 9 dwellings
				Phasing	11-15 years
				Green Belt	No. Brownfield site
Comments Any development would need to provide suitable mitigation to address surface water flood risk on areas of the site. A detailed heritage impact assessment may be required prior to any development. The public right of way running along the northern boundary would need to be protected. Re-provision of the community facility would be required on-site.					

The petition that was eventually submitted had more than 600 signatures from LOCAL residents. TRDC has entered detailed discussions with the Parish Council about the future development and use of the site.

TRDC appears to have accepted our comments in part, with the additional text:

“A detailed heritage impact assessment may be required prior to any development” and “Re-provision of the community facility would be required on site.”

Therefore, we need to find a nuanced response that protects the community facility.

H9: 33 Baldwins Lane (Croxley Car Centre)

This site was allocated for development in the existing Local Plan (2014 Site Allocations) CGPC commented in 2021:

“This is a small site (0.9 hectare) close to the railway embankment. It is currently allocated for 10 dwellings, which we consider the maximum capacity of the site. The proposal to increase this to 59 dwellings is unacceptable and would result in a development completely out of keeping with the area.

Development of this site would also end the possibility of a Croxley Rail Link / Metropolitan Line Extension which will be needed to cope with the high rise residential housing being constructed on Ascot Road (close by in Watford).

We object to the proposed increase in the number of dwellings which would be contrary to preferred policy options 6 and 23 and against the recommendations of the Building Better, Building Beautiful Commission.”

H9: 33 Baldwins Lane

Site Ref.	H9	Site	33 Baldwins Lane	Size (ha):	0.09
				Current Use	Car sales centre
				Dwelling Capacity	10 dwellings
				Phasing	6-10 years
				Green Belt	No. Brownfield site
<p>Comments</p> <p>The site is an existing housing allocation in 2014 adopted Local Plan approved by the Government appointed Inspector. Any development would be required to provide suitable mitigation to address surface water flood risk and groundwater flood risk on the site. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. Potential noise and vibrations caused by the use of the railway line should be addressed through mitigation.</p>					

TRDC subsequently admitted that the increase in the number of dwellings to 59 was the result of an arithmetical error in their consultation document.

Therefore, we might comment on the effect on the proposed alignment of the proposed Croxley Rail Link / Metropolitan Line extension without explicitly opposing the site allocation.

CFS61: Cinnamond House, Cassiobridge

CGPC commented in 2021:

“Suitable for redevelopment, although the current site provides a visual break between the settlements of Croxley Green and Watford and some of the land is within the Green Belt, separating Croxley Green from Watford. Redevelopment would effectively merge the two settlement areas. Dwelling capacity implies high density housing without proximity to high capacity public transport links or shopping centres. Parking is likely to be an issue.

The site is described as being 1 hectare, and suitable for 133 dwellings, way in excess of the proposed maximum housing density of 50 dwellings per hectare. This is simply unacceptable at this location.

Development of this site would also end the possibility of a Croxley Rail Link / Metropolitan Line Extension which will be needed to cope with the high rise residential housing being constructed on Ascot Road (close by in Watford).”

CFS61: Cinnamond House Cassiobridge

Site Ref.	CFS61	Site	Cinnamond House Cassiobridge	Size (ha):	1.0
				Current Use	Office, workshop and parking
				Dwelling Capacity	133 dwellings
				Phasing	11-10 years
				Green Belt	Yes. If allocated the Green Belt boundary would have to be revised. Partly brownfield site
<p>Comments</p> <p>Any development would be required to provide suitable mitigation to address surface water flood risk and groundwater flood risk on the site. The site is in Groundwater Source Protection Zone 1; a preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Potential noise and vibrations caused by the use of the railway line should be addressed through mitigation measures. The site would be required to provide open space and play space.</p>					

Therefore, we might comment as before, and on the effect on the proposed alignment of the proposed Croxley Rail Link / Metropolitan Line extension without explicitly opposing the site allocation.

We might ask how much open space and play areas are required when the Two Bridges playground and open space is relatively close by (a short walk across the Watford Road).

APPENDIX 2

DRAFT RESPONSE TO THREE RIVERS DISTRICT COUNCIL
CONSULTATION ON THREE RIVERS PREFERRED LOCAL PLAN LOWER HOUSING
GROWTH OPTION – PROTECTING THE GREEN BELT

[to be added following discussion]

We may also want to comment on question 107 – about the Sustainability Appraisal.

DRAFT FOR REVIEW