

## Croxley Green Residents' Association

### FACT or FICTION - Local Plan myths busted

***“The housing number supplied by the government is a mandatory target and must be met or exceeded.”***

**- MYTH**

The number derived from the government standard methodology is NOT a mandatory target. It is only a starting point. The final Local Plan number could go up or down depending on overall strategy, local policies, priorities and local constraints such as having a high proportion of Green Belt land that is prioritised by the Government for protection. Local Planning Authorities (LPAs) can deliver a Local Plan with a lower number. Naturally, the number and method must be fully justified, being able to stand up to inspection and scrutiny by the Planning Inspector. This has been stated in a letter and in a statement from the Ministry for Housing, Communities and Local Government.

***“The Ministry for Housing, Communities and Local Government provides clear, unambiguous guidance to LPAs in its letters and written statements.”***

**SURELY THIS MUST BE TRUE!**

***“If TRDC does not meet the government issued housing number, the government will step in and take over the TRDC Local Plan.” - MYTH***

Under Section 27 of the 'Planning and Compulsory Purchase Act 2004' and other associated acts, the Secretary of State (SoS) can intervene in a LPAs Local Plan. However, whilst successive SoS have used this power of intervention, it has been used to censure, not to take control. Additionally, it has been directed towards a very small number of boroughs with a poor track record of Local Plan development. TRDC shouldn't fall into this category, having had a Local Plan in place since 2011.

***“If TRDC does not meet the government issued housing number, the government Planning Inspector will insist that Green Belt land is surrendered.” - MYTH***

An Inspector can recommend that TRDC looks again at its land supply, to consider whether more can be allocated in the plan to meet the government housing number, but they cannot even suggest that Green Belt be used. Therefore, the Planning Inspector will NOT tell TRDC to release Green Belt land, unless TRDC has already made the case for 'exceptional circumstances' and already declassified some Green Belt land in the Draft Local Plan. (3rd Mar 2014 - Nick Boles MP (Under Secretary of State for Planning) admonished the Planning Inspectorate for directing Reigate & Banstead to use Green Belt

to meet the housing number. The MP stated that it is for the LPA to determine whether or not Green Belt land is relinquished, not the Planning Inspectorate). If unmet need remains in the submitted Local Plan, developers with land interests will request release of more Green Belt which is the real threat.

***“The government issued housing number of 630 pa (12,624 over the Plan period) must be what's really required, since it uses the December 2020 revised standard method.” - MYTH***

A base estimate of annual household growth from 2014 is used, despite the 2019 figure being available and more relevant. An affordability adjustment gives an uplift on the base number. It aspires to reduce house prices and make up for past under delivery of market and affordable housing. It is a flawed method, using outdated projections. Planning guidance allows alternative methods of assessing need, providing there are justified exceptional circumstances which TRDC refuse to investigate.

***“Delivering a larger number of houses will make housing in Three Rivers more affordable, which will benefit first-time buyers, public service and ancillary workers.” - MYTH***

Unfortunately, the theory behind the government's standard method is that increasing the supply of housing will make homes more affordable. This is flawed thinking, as the housing market does not operate as a simple 'supply & demand' model, especially around London and highly desirable locations like Three Rivers. The market is complex and supply is controlled by a small number of housebuilders, who manage delivery to maintain higher prices and associated profits.

***“We must need the volume of housing stated, since it comes from the Ministry of Housing, Communities and Local Government (MHCLG).” - MYTH***

The government's calculation uses outdated figures and does not take into account the current population position:

- The UK's population growth rate is the slowest it has been since 2004 (*UK Gov. ONS report: 'Overview of the UK population: Jan 2021'*)
- The UK fertility rate is lower than all previous years since 2002, declining to 1.6 (2019) (*UK Gov. ONS report: 'Births in England and Wales: 2019'*)
- The '2014-based Household Projections: England, 2014-2039' (Department for Communities & Local Government) predicted that 210,000 houses would be required each year. However,

the 'Household projections for England: 2018-based' (ONS) predicted that 164,000 houses would be required each year. The current housing number is based on the outdated 2014 figures, not on the more current 2018 figures.

***“We must build on Green Belt, otherwise every town will be swamped with flats & high-rise accommodation.” - MYTH***

An objectively assessed compromise rather than the government issued housing need, coupled with good design and space planning can deliver increased levels of housing which retains the existing character of the borough, without resorting to large scale urban intensification. Calculations undertaken by the Three Rivers Joint Three Rivers Residents' Association, for example, and provided to TRDC, gives a total of 4,577 homes and minimal Green Belt release.

***“TRDCs Draft Local Plan makes the case for ‘exceptional circumstances’ for development in the Green Belt. That means all TRDC’s Green Belt land can be considered for development, not just the council ‘selected’ areas.” - TRUE***

Once the case for 'exceptional circumstances' has been made for loss of Green Belt land for development, the Planning Inspector can request the release of more Green Belt to make up any housing number shortfall or to simply increase housing delivery. Housing developers will seize on TRDC's willingness to sacrifice Green Belt and appeal to the Planning Inspector at examination, to allow more development on Green Belt.

***“TRDC has accepted the ‘LUC Green Belt Boundary Review (January 2020)’, so there is no way to dispute their findings.” - MYTH***

LUC has provided a professional assessment, based on their approach to evidence gathering. The report is a 'professional judgement', it is not a factual document, so can be contested with an alternate assessment and more accurate evidence.

***“Councillors cannot and must not interfere with the preparation of the TRDC Local Plan. Council officers must be allowed to progress their work uninterrupted.” - MYTH***

A Local Plan is owned by the Administration. Officers and councillors should work in partnership to produce a Local Plan. Council officers, as planning professionals, need to ensure that legal requirements are met, that the plan is technically sound and that due process and procedure are followed. However, councillors can steer and guide the strategic direction. It may be considered that TRDC councillors have become detached from the

Local Plan process, with the excuse of 'predetermination' being used as discouragement against involvement.

This is a direct quote from another borough's councillor:

*“It is important that councillors work closely with officers to guide the direction of a plan. Most Councils will require a new local plan to be approved by Full Council and it is therefore important that councillors own their plan as much as officers do or it could risk it not being adopted when recommended to Full Council. In practice the process is much more collaborative than providing an initial direction for Officers to proceed with. It is important that each stage of the process is discussed and actions agreed or Officers could lead it down a track that differs from councillor's expectations so wasting time and resources on abortive work.”*

***“TRDCs Full Council vote whether to accept or reject the Draft Local Plan, before it is submitted for examination. Councillors are empowered to reject the Draft Local Plan.” - TRUE***

Councillors can reject the Draft Local Plan presented, if they feel it is not a plan which best serves their residents or does not present a sustainable strategic plan suitable for TRDC's environment and character.

***“Councillors will have no choice but to accept the Draft Local Plan, since TRDC urgently needs a Local Plan now and could risk government intervention.” - MYTH***

TRDC does need a new Local Plan, but not an inappropriate or poor plan. However, there is still time to ensure a good plan for TRDC is delivered. A January 2021 government press release states: *“In March 2020, the government set a deadline of December 2023 for all authorities to have up-to-date Local Plans in place.”*

***“Councillors should not engage with individual groups of residents to discuss the Local Plan, for fear of accusations of bias or favouritism.” - MYTH***

This is completely wrong in every conceivable way. Councillors MUST engage with their local residents! This can be individually, in groups or with recognised organisations. Residents elect Councillors to represent their interests and two-way communication is essential. The Local Plan making process is *not* restricted to Regulation 18 and 19 public consultations; good practice indicates there should be ongoing engagement and dialogue between all interested parties. The EBC Statement of Community Involvement 2018 (Updated 2019) supports this approach.