**Question 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 owing 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

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

Three Rivers Joint Residents’ Association comprises the Residents’ Associations from across the district. We support the level of housing proposed as it balances the need to provide new housing with the requirement to protect Green Belt.

We recognise that developing on brownfield sites alone would deliver too few houses (less than 1,000 over the plan period), so that it will be necessary to develop about 50% of new housing on greenfield and, specifically, Green Belt sites. The approach that this plan takes to allow development on Green Belt sites that result in lower harm to the overall Green Belt, whilst only allowing development on higher harm Green Belt sites in specific circumstances, delivers the balance that we believe is needed.

We acknowledge that the government has defined a Standard Methodology to calculate housing need, but the government accepts that this is based on outdated statistics of expected population / household growth, and does not reflect local variations and constraints. As such, the Standard Method can hardly be described as an “objectively assessed need”. In fact, even the NPPF simply describes it as a measure of “local housing need”.

So, whilst the Standard Methodology is a starting point, bearing in mind the potential damage to the Green Belt to meet its “local housing need”, it is vital to understand the true objectively assessed need using the latest possible data and considering all local factors. To this end, for the Regulation 18 Consultation conducted in 2021, an independent calculation of the objectively assessed need was conducted, using the latest data from the ONS and other sources. This analysis identified a need for between 4,500 and 5,500 new homes over the plan period to cope with projected population growth, to address the shortage of homes for the 20–40 years age group and to provide the resource required for forecast economic growth.

To achieve the level of housing required to meet that given by the Standard Methodology would require approximately 80% of new housing to be built on Green Belt sites, including sites at the highest level of harm to the Green Belt, without any clear benefit to local community as the amount of housing produced would far exceed the objectively assessed housing need. Limiting new housing to the level proposed by the Council in this Plan, will produce the housing needed in the district whilst restricting the damage done to the Green Belt.

As such, the housing level proposed in this plan fairly balances the need to provide new housing with the requirement to protect Green Belt, and therefore this plan has our strong support.

**Question 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

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

The Low Growth option proposed is supported by the Three Rivers Joint Residents’ Association as it balances the need to provide new housing with the requirement to protect Green Belt.

We recognise that developing on brownfield sites alone would deliver too few houses (less than 1,000 over the plan period), so that it will be necessary to develop about 50% of new housing on greenfield and, specifically, Green Belt sites. The approach that this plan takes to allow development on Green Belt sites that result in lower harm to the overall Green Belt, whilst only allowing development on higher harm Green Belt sites in specific circumstances, delivers the balance that we believe is needed.

The High Growth Option is based upon the government’s Standard Methodology. We acknowledge that the government has defined this methodology as a starting point to calculate housing need, but the government itself accepts that this is based on outdated statistics of expected population / household growth and does not reflect local variations and constraints. As such, the Standard Method can hardly be described as an “objectively assessed need”. In fact, even the NPPF simply describes it as a measure of “local housing need”.

So, whilst the Standard Methodology is a starting point, bearing in mind the potential damage to the Green Belt to meet the figure given by this, it is vital to understand the true objectively assessed need using the latest possible data and considering all local factors. To this end, for the Regulation 18 Consultation conducted in 2021, an independent calculation of the objectively assessed need was conducted, using the latest data from the ONS and other sources. This analysis identified a need for between 4,500 and 5,500 new homes over the plan period to cope with projected population growth, to address the shortage of homes for the 20–40 years age group and to provide the resource required for forecast economic growth.

To achieve the level of housing required to meet that given by the Standard Methodology (i.e. the High Growth Option) would require approximately 80% of new housing to be built on Green Belt sites, including sites at the highest level of harm to the Green Belt, without any clear benefit to local community as the amount of housing produced would far exceed the objectively assessed housing need. Limiting new housing to the level proposed by the Council in this Plan, by adopting the Low Growth - Green Belt Protection approach, will produce the housing needed in the district whilst restricting the damage done to the Green Belt.

As such, the Low Growth – Green Belt Protection option proposed in this plan fairly balances the need to provide new housing with the requirement to protect Green Belt, and therefore this plan has our strong support.

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

Yes

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

The Council has provided clear rationale as to why the excluded sites are not considered suitable for development. Individual Residents Associations may comment on specific sites in their area.