GREATER LONDON AUTHORITY

(By email)

Our Ref: MGLA210721-8990

10 August 2021

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 21 July 2021. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

I would like you to provide all correspondence made between Three Rivers District Council and Greater London Authority regarding any consultation made between both authorities in the production of the Three Rivers District Council Local Plan published on 7th July 2021. This needs to include any or all correspondence that has been exchanged between both authorities on how the local plan will affect traffic, roads, environmental, public transport, housing, trade within Harrow.

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request.

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at: Freedom of information | London City Hall

Sent: 08 September 2017 08:29

To: 'trldf@threerivers.gov.uk'; ThreeRivers.gov.uk'; threerivers.gov.uk

Cc:

Subject: FW: Three Rivers Local Plan - Publication of the 'Issues & Options and Call for Sites Consultation

Document' (Regulation 18 Consultation)

Attachments: Three Rivers LP Issues and Options - GLA response.pdf

Dear

Thank you for consulting us on your draft Local Plan.

Please find our response attached.

Kind regards



Senior Strategic Planner - Development, Enterprise & Environment GREATERLONDONAUTHORITY City Hall, The Queens Walk, London SE1 2AA T: +44 (0)20 7983 E: London.gov.uk

From: <u>ThreeRivers.gov.uk</u>]

Sent: 28 July 2017 15:01

Subject: Three Rivers Local Plan - Publication of the 'Issues & Options and Call for Sites Consultation Document'

(Regulation 18 Consultation)

Dear Consultee,

Three Rivers District Council is preparing a new Local Plan that will set out a vision and a framework for the future levels of growth within the District for the next fifteen years until 2032. The Issues & Options and Call for Sites Consultation Document is the first stage in preparing a new Local Plan for Three Rivers and this consultation is an opportunity for you to participate in it.

The Issues & Options and Call for Sites Consultation Document identifies some of the issues and challenges facing the District and the possible options that could help to address them. We are therefore asking for your views on the content of this document, the responses of which will help to influence and contribute towards the subsequent drafting of the Local Plan.

It is important to note that at this early stage, the consultation document does not contain any sites that may be considered suitable for development, nor does it contain any planning policies that will be used for the determination of planning applications. However, alongside this consultation, we are inviting the submission of new sites that could be developed to meet future demand for homes and jobs.

The Issues & Options and Call for Sites Consultation Document, Sustainability Appraisal, Response Form and the Call for Sites Submission Form can be viewed on the Council's website at: www.threerivers.gov.uk/eqcl-page/new-local-plan. Hard copies can also be viewed at the Council's offices in Rickmansworth (address below), the public libraries located within the District (Abbots Langley, Chorleywood, Croxley Green, Oxhey and Rickmansworth) and at the Parish Councils' Offices.

Addresses and opening times of the libraries are listed on the Hertfordshire County Council website at: hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx.

Responses to this consultation can be submitted to us in one of the following ways:

By email to: trldf@threerivers.gov.uk

By post to: Economic & Sustainable Development Three Rivers District Council Three Rivers House Northway Rickmansworth Herts WD3 1RL

The consultation period starts on Friday 28 July 2017 and runs for six weeks, ending at 5:00pm on Friday 8 September 2017.

Yours faithfully,



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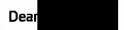
GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Principle Planning Officer

Three Rivers District Council Three Rivers House Northway Rickmansworth Herts WD3 1RL Date: 8 Sept 2017

Our ref: LP/JP28



Three Rivers Local Plan - Issues and Options consultation

Thank you for consulting us on your draft Local Plan Issues and Options.

The consideration of longer term historic migration trends in the South West Hertfordshire Strategic Housing Market Assessment is welcomed. The Council should note that our latest population and household projections are now available on the London Datastore: https://data.london.gov.uk/dataset/2016-based-projections-national-outputs. These projections include consistent outputs for all local authorities in England and will form the basis for housing need in the next London Plan.

We welcome the Council's consideration of broad options to meet and exceed the identified housing need. However, there is little information for consultees to assess the growth distribution options, in particular the potential scope and feasibility of a new settlement. We are looking forward to more information about this during the further development of the Plan.

From an economic perspective, there is little emerging policy detail. Given the proximity to the capital, it may be useful to explore relevant economic linkages with London and also to understand and consider the potential role of the District in the wider market area for industry and logistics provision given the favourable location within the transport network with good access to the M25.

Finally, the consultation draft does not include details/plans in terms of specific strategic transport requirements and opportunities, but we understand that Hertfordshire County Council is currently producing a Growth & Transport Plan for South West Hertfordshire, which will inform the further development of the Plan. The Council should note that we continue to support the Metropolitan Line Extension, for example through support for the bid for Forward Funding through the Housing and Infrastructure Fund by Hertfordshire County Council and other partners. Further details are included in the response by Transport for London.

If you would like to discuss the matters raised above further, please contact Jorn Peters @london.gov.uk).

Yours sincerely

Juliemma McLoughlin

Assistant Director - Planning

cc: National Planning Casework Unit, DCLG

Lucinda Turner, TfL

From: trldf (Three Rivers) <trldf@threerivers.gov.uk>

Sent: 26 October 2018 10:11

To: Mayor

Subject: Three Rivers Local Plan: Potential Sites Consultation Document

Dear Sir or Madam,

Three Rivers Local Plan: Potential Sites Consultation Document

Three Rivers District Council is preparing a new Local Plan that will set out a vision and framework for the future levels of growth within the District for the next 15 years until 2036. The Potential Sites Document contains sites that were put forward for consideration in the previous Local Plan process and were not allocated for development and those put forward by landowners, agents and developers as part of the Call for Sites consultations undertaken in 2017 and 2018.

The Potential Sites Consultation is an additional non-statutory consultation, providing the opportunity for stakeholders to comment on potential sites which will feed into the Strategic Housing and Employment Land Availability Assessment (SHELAA) process. The SHELAA is an assessment which identifies sites and broad locations with potential for development. It assesses their development potential, suitability for development and the likelihood of development coming forward. It is important to note that at this stage no decisions have yet been made on specific sites.

The Potential Sites Consultation Document and accompanying Sustainability Appraisal Working Note can be viewed on the Council's website at: www.threerivers.gov.uk/egcl-page/new-local-plan. Hard copies can also be viewed in the Council's offices in Rickmansworth (address below), the public libraries located within the District (Abbots Langley, Chorleywood, Croxley Green, Oxhey and Rickmansworth) and at the Parish/Town Councils' offices.

Addresses and opening times of the libraries are listed on the Hertfordshire County Council website at: www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx.

Responses to this consultation can be submitted to us in one of the following ways:

By email to: trldf@threerivers.gov.uk

By post to: Economic & Sustainable Development

Three Rivers District Council

Three Rivers House

Northway

Rickmansworth

Herts WD3 1RL

The consultation period starts on Friday 26 October 2018 and runs for six weeks, ending at 5:00pm on Friday 7 December 2018.

Yours faithfully,

Economic & Sustainable Development

Three Rivers District Council

Sent:

28 May 2020 14:53

To:

Cc:

Subject: Attachments: RE: Three Rivers District Council - Formal Letter re accommodating unmet housing needs. Three Rivers DC - DtC - May 2020.pdf; Letter Three Rivers Housing Needs and Green Belt April

2020.pdf

Dear

Thank you for your again attached letter of 29 April 2020.

Please find the formal response from our Director also attached.

Many thanks



Principal Strategic Planner | London Plan & Growth Strategies GREATERLONDON AUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

www.london.gov.uk/what-we-do/planning

london.gov.uk

From:

ThreeRivers.gov.uk>

Sent: 29 April 2020 15:08

london.gov.uk> To:

Subject: FW: Three Rivers District Council - Formal Letter re accommodating unmet housing needs.

Dear



Further to my email below, I have been advised that the GLA is responsible for the housing/employment needs targets for the London Boroughs.

Please find attached a letter formally requesting the GLA to consider accommodating Three Rivers District Council's unmet housing and employment needs.

I look forward to hearing from you.

Kind regards



Three Rivers District Council

Three Rivers House, Northway, Rickmansworth, Herts, WD3 1RL



Sent: 11 March 2020 09:26

To: london.gov.uk' < london.gov.uk>

Cc:

Subject: Three Rivers District Council - Formal Letter re accommodating unmet housing needs.



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

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 are considering altering the Green Belt boundaries to accommodate growth and in order to demonstrate that exceptional circumstances exist, we are required to demonstrate that we have had discussions with our neighbouring authorities about whether they can accommodate some of the identified need for development.

The attached letters were sent to the London Boroughs of Harrow and Hillingdon as they are neighbouring authorities.

We have also arranged Duty to Cooperate meetings with both authorities to discuss in more detail our emerging plan and any cross boundary issues arising.

If you have any queries or would like to discuss further, please do not hesitate to contact me.

Kind regards

Three Rivers District Council

Three Rivers House, Northway, Rickmansworth, Herts, WD3 1RL

www.threerivers.gov.uk https://my.threerivers.gov.uk/



Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Herts WD3 1RL
Tel: (01923) 776611

Senior Strategic Planner Greater London Authority City Hall More London Riverside London SE1 2AA My Ref: DCES/CM

Your Ref:

Date: 29 April 2020

Contact : Tel No :

Email Add: threerivers.gov.uk

Dear

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.

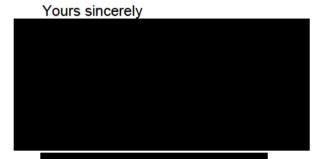
Given these requirements and to ensure that previously developed land is maximised, we have set out to:

- 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 the Greater London Authority 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.

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.



Three Rivers District Council



GREATER LONDON AUTHORITY

Head of Planning Policy & Projects Three Rivers District Council Three Rivers House Northway Rickmansworth Herts WD3 1RL **Department: Planning**Your reference: DCES/CM
Our reference: LP/JP62
Date: 27 May 2020

Dear

Three Rivers District Council

Thank you for your letter of 29 April 2020.

Planning Policy Guidance (https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments) makes clear that it is for the Mayor to distribute London's total housing requirement across his plan-making area (see paragraph 13).

The Intend to Publish London Plan states that London is considered as a single housing market area (paragraph 4.1.2), and it does not identify any surplus capacity to accommodate unmet housing need from outside London.

Polices SD2 and SD3 of the Plan reflect our approach to collaboration on strategic matters with authorities outside London. Our non-statutory strategic collaboration arrangements are managed by South East England Councils, the East of England Local Government Association, London Councils and the Mayor. Jointly, we are considering area-focused Roundtable meetings with council Leaders/Chief Executives to explore practical collaboration opportunities around growth, infrastructure and the economy.

The GLA is also interested in engaging in the preparation of the South West Hertfordshire Joint Strategic Plan and will discuss this with

If you have any questions about the above, please contact at london.gov.uk. We are looking forward to contributing to your next Local Plan consultation document.

Yours sincerely

Debbie Jackson

Director - Built Environment

From: Planning Support
Sent: 11 June 2021 16:14

To:

Subject: FW: Three Rivers Local Plan: Publication of the Local Plan Regulation 18 Preferred Policy Options

and Sites for Potential Allocation Consultation

Technical Support Co-ordinator, PlanningGood Growth
GREATER**LONDON**AUTHORITY
City Hall, The Queens Walk, London SE1 2AA

london.gov.uk

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Planning Portal application forms in London are changing.

From 16th November 2020 additional information will be required when submitting new Planning Applications.

For more information please click here.

From:

Sent: 11 June 2021 12:33 To: Planning Support <

LANNING

Subject: FW: Three Rivers Local Plan: Publication of the Local Plan Regulation 18 Preferred Policy Options and Sites

for Potential Allocation Consultation

From: Localplanconsult < Localplanconsult@threerivers.gov.uk >

Sent: 11 June 2021 09:35

To: Mayor <mayor@london.gov.uk>

Subject: Three Rivers Local Plan: Publication of the Local Plan Regulation 18 Preferred Policy Options and Sites for

Potential Allocation Consultation

Dear Sir or Madam,

Three Rivers Local Plan: Publication of the Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation Consultation Documents

Three Rivers District Council is preparing a new Local Plan that will set out a vision and policy framework for the future levels of growth within the District up until 2038. The Local Plan Regulation 18 consultation is presented in two parts:

- ☐. Part 1: Preferred Policy Options A vision and objectives for the Plan Area and detailed policies for determining development proposals
- ☐. Part 2: Sites for Potential Allocation This sets out the potential sites where development could take place, how much development could take place and when.

The Local Plan Regulation 18 consultation is an additional consultation, providing the opportunity for residents, businesses, community groups and all other stakeholders to comment on the Preferred Policy Options and Sites for Potential Allocation. Your views submitted as part of this consultation will help inform the next stage and ultimately the document to be submitted to the Secretary of State.

The Local Plan Regulation 18 Consultation Documents, accompanying Sustainability Appraisal and the evidence base studies which have been completed so far can be viewed on the Council's website at: www.threerivers.gov.uk/egcl-page/new-local-plan. The consultation documents are currently only available on the Council's website because of the temporary COVID19 regulations for local plan consultations which are in place until December 2021. If this causes any issue, please contact us using the contact details above.

How to respond

Representations must be made in writing and include your name and address.

Our preferred method for accepting your representations is through our website, using our consultation portal which can be accessed from the following webpage: www.threerivers.gov.uk/egcl-page/new-local-plan.

You can also send representations in the following ways:

By email to: <u>localplanconsult@threerivers.gov.uk</u>

By post to: Economic & Sustainable Development

Three Rivers District Council

Three Rivers House

Northway

Rickmansworth

Herts WD3 1RL

The consultation period starts on Friday 11 June 2021 and runs for six weeks, ending at 5:00pm on Friday 23 July 2021.

Privacy

We will only use the information you provide in your response for the purpose of this consultation. Only comments by respondents who provide their name and address will be considered. Please note that your name, organisation and response will be made publically available once we publish the responses; any comments made in your response therefore cannot be treated as confidential (published comments will exclude your personal contact details).

For further information on how to respond, or if you would like to be removed from the mailing list, please send an email to localplanconsult@threerivers.gov.uk.

Due to the anticipated volume of responses, it will not be possible to reply individually to each consultation response.

Yours faithfully,



Economic & Sustainable Development

Three Rivers District Council

Three Rivers House, Northway, Rickmansworth, Herts, WD3 1RL

www.threerivers.gov.uk/ https://my.threerivers.gov.uk/

Sent:

22 July 2021 15:30

To:

Three Rivers.gov.uk

Cc:

Subject:

RE: Three Rivers District Council - Request to consider unmet housing need

Attachments:

Letter to GLA re Housing Needs June 2021.pdf



I am sorry for the delay in responding to your again attached letter.

The London Plan position on this issue has not changed in the light of its publication in March 2021. Therefore, I am reiterating what was set out in our previous response of 27 May 2020:

Planning Policy Guidance (Housing and economic needs assessment - GOV.UK (www.gov.uk)) makes clear that it is for the Mayor of London to distribute London's total housing requirement across his plan-making area (see paragraph 13). The London Plan 2021 states that London is considered as a single housing market area (paragraph 4.1.2), and it does not identify any surplus capacity to accommodate unmet housing need outside London.

For your records, please note that Debbie Jackson has left the GLA, and our Assistant Director for Planning is Lucinda Turner.

Kind regards



Principal Strategic Planner | Local Plans

London Plan & Growth Strategies Team GREATERLONDON AUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

www.london.gov.uk/what-we-do/planning

london.gov.uk

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From:

ThreeRivers.gov.uk>

Sent: 14 June 2021 15:06

@london.gov.uk To:

Cc:

london.gov.uk>;

@ThreeRivers.gov.uk>

Subject: Three Rivers District Council - Request to consider unmet housing need

Dear Ms Jackson,

Please find attached a letter requesting assistance with the unmet housing needs in Three Rivers District.

Kind regards

Head of Planning Policy & Projects
Three Rivers District Council
Three Rivers House, Northway, Rickmansworth, Herts, WD3 1RL

www.threerivers.gov.uk https://my.threerivers.gov.uk/



Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Herts WD3 1RL
Tel: (01923) 776611

Debbie Jackson Director Built Environment Greater London Authority City Hall London SE1 2AA My Ref: DCES/CM

Your Ref :

Date: 15 June 2021

Contact : Tel No :

Email Add: threerivers.gov.uk

Dear Ms Jackson,

Three Rivers District Council

On the 6 March 2020 I wrote to you asking whether your authority was able to accommodate some of the growth shortfall that was identified at that time to inform our considerations as to whether to amend Green Belt boundaries to accommodate that need.

At that stage of the preparation of our Local Plan, the Strategic Housing Land Availability Assessment and Urban Capacity Study indicated that less than 3,600 homes (taking account of completions, commitments and a windfall allowance) could be accommodated on land not designated as Green Belt and that approximately 7ha of the identified need for industrial/warehouse use could also not be accommodated on land not designated as Green Belt.

Subsequent to our letter of the 6 March 2020 we completed further work in the form of an Edge of Settlement & New Settlement Scoping Report. This desktop based study first sought to identify potential locations at the edge of existing settlements which had not so far been considered in the Strategic Housing and Employment Land Availability Assessment following the Call for Sites exercises undertaken.

A total of 17 potential edge of settlement locations were identified through the desktop assessment Out of these, four edge of settlement sites were considered deliverable/developable for potential allocation following the SHELAA assessment process. These sites, along with other sites in the Green Belt that were considered deliverable/developable through the SHELAA process, and in consideration of the Sustainability Appraisals and evidence base studies such as the Green Belt Reviews, meant that it was likely that we would be able to meet the housing target subject to Council approval.

The work we have undertaken to ensure that previously developed land is maximised is as follows:

- Reviewed the housing densities and capacities of all potential sites located within settlement boundaries
- Applied a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- Assessed the utilisation of local vacant housing stock
- Reviewed the achievability and deliverability of Three Rivers' own land assets.

 Contacted owners/occupiers of potential brownfield sites who had not yet submitted any of their land holdings

At the Annual Council meeting of the 25 May 2021, it was resolved to omit two strategic sites and the potential contingency sites from the Regulation 18 documents prior to consultation. You can view the proposed amendments at https://www.threerivers.gov.uk/meeting/annual-council at Recommendation 6

As a result, the sites in the Regulation 18 documents for potential allocation will deliver approximately 8,973 dwellings (84% of the residual housing target) resulting in a shortfall of 1,705 dwellings over the Plan period against the current standard method of calculating local housing need.

As you are aware, the Regulation 18 stage is an early stage in the preparation of the Local Plan and representations received will be considered and amendments made where appropriate to the Draft Local Plan prior to the Regulation 19 stage.

Your response to my letter of the 6 March 2020 stated that The Intend to Publish London Plan stated that London is considered as a single housing market area and it does not identify any surplus capacity to accommodate unmet housing need from outside London. I am asking now whether you are willing to have further discussions to ascertain whether you would be able to support the London Boroughs of Hillingdon and Harrow to accommodate any of our shortfall as part of their Local Plan preparation.

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



Three Rivers District Council