



Hello, my name is Mike Withington and I am speaking on behalf of Mr. Barry Grant, the chairman of the Croxley Residents Association.

We understand that the purpose of this Hearing Session is to hear only from those who responded to the recent Main Modifications Consultation conducted by TRDC and, expressly, not to give a voice to people who have been excluded at various stages of the consultation process by TRDC. This denies a first public discussion of the removal of Green Belt status to considerable area of land in Croxley Green.

We do, however, thank you for agreeing to hear the submission of the Croxley Residents Association.

We would like to address six areas of importance.

Firstly, the consultation process itself.

- Three Rivers District Council (TRDC) did consult with all residents when sites within the Green Belt were put forward as sites for development in December 2011 / January 2012 and was overwhelmed with a record number of consultation responses that specifically opposed secondary school sites and major housing development in Croxley Green's Green belt. The margin of the 'vote' against green belt development far exceeded any local politician's margin of mandate.
- Opposition was based on National Green Belt policy guidance and the fact that no exceptional circumstances for development on Green Belt sites were provided.

- Residents in general, rather than those who actually responded to the original sets of Plan consultation, would have expected to have been consulted on the removal of Green Belt via changes to Green Belt boundary and were shocked that, with no prior public notification or consultation, their local authority has implemented the recommendation of one public official.
- Mr. Grant sent you a diagram illustrating the consultation process conducted by TRDC. Behind its comedic presentation is the serious message that at each stage, TRDC have sought to remove people with troublesome input. Hence he concludes that the opinion of all but a single cat has been removed.
- TRDC dispatched a letter in December 2013 only to previous consultation respondents concerning your suggested modifications – the removal of Green Belt land and went out of its way to avoid making any reference to Green Belt removal. Website references were similarly lacking. This begs the question – was, as per Government guidelines on consultation, sufficient information made available to stakeholders to enable them to make informed comments?
- The removal of Green Belt had not been on TRDC's SALDD (Site Allocations Local Development Document) agenda until you (the Inspector) made your Green Belt removal recommendations late last year. So how can TRDC demonstrate that a qualitative assessment has been undertaken that is in the best interests of all parties?
- Indeed, Mr. Kemp explained to Mr. Grant that as the proposed modifications arose post-hearings, it was, of course, not possible to present a case to the Inspector at the original hearings as the issue of Green Belt removal was not part of the Plan at that time.

- In September 2013 HCC purchased the horse field site. How can HCC speculatively spend public money when no decision has been made about the removal of Green Belt status? Can we conclude that HCC & TRDC believe that the process of removing the status is entirely within their control irrespective of the outcome of public consultation?
- Such apparent contempt for the input from residents fuels genuine widespread concerns that the authorities' allocation process is "done and dusted" before any public consultation response is considered.

## Secondly, what constitutes “minor” changes to the Green Belt Boundary?

- The areas of Green Belt being taken away and built upon are “major” to the people living in Croxley Green.
- The proposed changes are not minor adjustments to the boundary or the addition of an outbuilding or two. They are two significantly large developments.
- The goal posts have moved significantly, so why hasn't **everyone** living in Three Rivers District been consulted? Green Belt and its removal is **the** most emotive local topic – we are all affected! TRDC goes all out to inform all affected when recycling bins change, when roads are being micro-resurfaced but wants Green Belt to disappear under the radar!

### Thirdly, Exceptional Circumstances

- Does your recommendation for a modification that removes Green Belt, at a stroke, remove the requirement for “Exceptional circumstances” to be demonstrated?
- The residents in general believe that the housing can rarely be defined as an exceptional circumstance. We do, however believe that construction of new schools may be exceptional if no other suitable site could be found. The original SALDD proposed several sites and the consultation resulted in a resounding selection of the site in Mill End. This was popular with residents of Mill End and Maple Cross as they do not have a secondary school since William Penn was closed to build houses. It was also popular in Croxley as school places would be freed up by children not travelling from Mill End and Maple Cross. It would reduce traffic in Maple Cross, Mill End and Croxley. TRDC has not provided a good reason why this site was dismissed.
- In the absence of sound “exceptional circumstances” the SALDD should be suspended for a review of TRDC Green Belt changes. The case for exceptional circumstances needs to be proven in public.

#### Fourthly, TRDC blames the bogeyman Inspector

- The officers and councilors are so scared of you that they presented your recommendations as a plan that must be implemented without further discussion between them and the Inspectorate. This may be because it either suits their agenda or that they cast themselves as powerless pawns who valiantly failed to defeat the evil Inspector. Certainly that is how it was portrayed by Councillors in their recent local election collateral.
- We believe that if they were doing their job properly they would be engaging in open and constructive dialog with both the Inspectorate and the public to define an acceptable plan. There is a need to establish a coherent sustainable way forward, free from the political and geographical bias of our Local Authority, one that is transparent in the eyes of voters.

#### Fifthly, the effect of removing the Green Belt status from the planned land on other Green Belt land in Croxley Green

The removal of Green Belt status exposes other Green Belt land to risk in the next review. For instance, if the Killingdown Farm site is built on, the adjacent package of Green belt is surrounded by housing and the former school fields that are earmarked for development. Is this part of TRDC's chess game?

## Finally, Soundness

- TRDC is desperate for you (the Inspector) to just sign off their plan as sound so they can tick their boxes. The only criterion that they believe that you can reject it on is whether they have met the housing allocation requirements, but planning is holistic. TRDC have overlooked/suppressed the following:
  - The Conservation area status
  - Impact of the loss of Green Belt
  - Have not pursued Brownfield opportunities sufficiently, in fact their Affordable Housing Contributions requirement is the highest of any district council in England and is seen as a significant financial factor for developers of small developments or single new builds



## In Summary

There is acute awareness of:

- a) The pressure on the LPA to identify housing and infrastructure land for development in the area;
- b) A huge amount of pressure from commercial interests and developers;
- c) The Planning Inspectorate in requiring that the numbers stack up.

However, the Government continuously states that it is committed to protecting the Green Belt.

If you like, it claims that Green Belt land is innocent until proven guilty.

Why has our Green Belt been sentenced to death without a trial and we are struggling to appeal?

A fair fight with an honest and transparent assessment would have indicated early in the site allocations process that a Green Belt review was required. The LPA could have undertaken qualitative assessment of the situation and provided rationale for selective Green Belt Boundary change that, however unpalatable, would be accepted by the majority in the District.

There is still time to adopt such an approach.