

LAND NORTH OF LITTLE GREEN LANE, CROXLEY GREEN

LPA Planning Application Reference: 24/2073/OUT

LPA Appeal Reference: 26/0012/REF

PINS Appeal Reference: 6004972

SUBMISSION OF THREE RIVERS JOINT RESIDENTS' ASSOCIATION

27TH August 2026

Three Rivers Joint Residents' Association is an umbrella organization of which all major Residents' Associations in Three Rivers are members. We work on areas of mutual interest to the Residents' Associations, including planning. This site is of concern to all residents of Three Rivers due to its proximity to Whippendell Woods and the apparent erroneous attempt to classify it as grey belt.

It is the Council's established opinion that this site is Green Belt based upon the Stage 4 Green Belt Review prepared by Ove Arup & Partners Limited as part of the new Local Plan process. Ove Arup & Partners are a highly regarded consultancy in this area and prepared the report having consulted extensively with MHCLG.

In this report, Parcel CG8, which is a direct representation of the site described here as "Land North of Little Green Lane", is categorised as Green Belt due to its relatively significant impact on purpose a) of the Green Belt. The conclusions of this report were formally adopted by the Council at the Extraordinary Full Council meeting on 27th January 2026 and the Council has never revised this opinion. Officers lack the power to override a Full Council decision. As such, any assertion that the Council considers the site as grey belt at this appeal should be considered ultra vires.

A copy of the final Stage 4 Green Belt Review report is available from the Council.

It has also been proposed that inclusion of this site in the Local Plan required by the Housing Minister, Matthew Pennycook, categorises the site as grey belt. However the Minister never asserts this and, in his letter to the Council of 15th April 2026, the Minister accepts that the inclusion of this site in the Local Plan needs to be tested at Examination. A copy of this letter is available from the Council.

Based on this, any assertion that the Council considers this site grey belt lacks lawful support and, under NPPF policy GB7 g), development of the site remains inappropriate development in the Green Belt.

The Association accepts that the Council can override this inappropriateness under NPPF policy GB6 if it considers there are very special circumstances sufficient to outweigh the harm to the Green Belt and, on these grounds, it would be lawful to withdraw the Green Belt reason for refusal.

The Association would contend that, with the publication of Local Plan Regulation 19 consultation, these very special circumstances should be reconsidered. Even after removing this site from the new Local Plan housing trajectory, the new Local Plan would have at least 4.5 years housing supply for each of the first seven years of the plan. It is accepted that the new Local Plan can only be given very limited weight at this appeal, but it should be given consideration.

If this appeal is granted, we would ask that a condition be imposed to ensure that Whippendell Woods are properly protected. Whippendell Woods is an SSSI and an invaluable resource to all residents of Three Rivers and Watford along with large parts of Hertsmere and Dacorum. Residents use this for leisure and access to nature and the fact that it has a rural setting is key to this. As such, we would ask that any planning permission be conditioned on the inclusion of a wide green separation of Whippendell Woods from the housing, in the way shown in the Master Plan given in the applicant's Design and Access statement.