Dear Mr Manning,

Examination of Site Allocations Local Development Document (SALDD)

I write further to your letters of the 10\textsuperscript{th} and 30\textsuperscript{th} July 2013 and respond to your questions below:

We are in the process of completing an Excel spreadsheet detailing the allocated housing sites as suggested in your letters and I will forward that to the Programme Officer in the next few days.

I note that there is a small sites contribution of 38 dwellings per annum anticipated in the final years of the plan period. Is there any intelligence, on the basis of the evidence that informs the assumption, as to how this might be distributed in the context of the spatial strategy?

Monitoring information set out in the SHLAA Update shows that, on average, 38 dwellings per year have been completed from the identified sources of windfalls. Supply from windfalls has come from across the whole District, and it was therefore not possible for the SHLAA Update to identify broad locations where the supply is likely to continue, further than ‘within the urban area’.

Given very high house prices in the District which are expected to remain strong as a result of the District’s location on the edge of London and the Green Belt, pattern of development and character of the District, it is anticipated that patterns and rates of development from these sources will continue at approximately the same rate across the plan period.

As set out in the Core Strategy, the windfall allowance will be monitored annually and revised as appropriate through the Annual Monitoring Report and housing trajectory updates.

I would welcome early further clarification (ideally including more detailed plans) on the likely balance and distribution of employment and housing anticipated on the Kings Langley mixed use site referenced H(3) and E(e). Concerns have been raised in representations and it will be important to fully understand the Council’s thinking on this.

The Kings Langley Employment Area has been identified as a mixed use allocation in accordance with PSP3 of the adopted Core Strategy. As a site allocated for mixed use development, the area will provide for development including, but not limited to housing, business, industrial and storage or distribution, residential or community uses. The indicative dwelling capacity will contribute to the District’s housing requirements, and redistributing employment space through mixed use development will maintain and enhance employment opportunities.

The site is within an existing urban area with reasonable access to public transport, education, local shopping facilities and open space. The sites suitability as a mixed use allocation is shown in the
redevelopment of the Ovaltine Factory site for housing. Employment uses are now interspersed with residential.

Individual employment and housing sites have not been identified to allow flexibility for different forms and uses of development to come forward across the site in the future. However we have received comments from Alpine Press, at the Site Allocations Preferred Options stage, stating that the indicative capacity of 150 was too low and that the Alpine Press site would be ideal as a supermarket facility to serve the local residents. There was also a representation from Gade View Investments stating that part of their site would also be suitable for housing. There has also been a recent pre-application for conversion of light manufacturing premises to residential use suggesting a capacity of 40-50 dwellings. Appendix 2 details an indicative location of these potential residential developments.

There is therefore a clear intention of the owners to revert to an alternative use. The Council acknowledges that a range of uses will need to be balanced against each other in order to support viable and sustainable development.

The indicative phasing for developing the mixed use site is identified as 2012-2026. Over such a period of time, the Council will have greater control over the roll-out of development and mixes of land use, so different uses are not being compromised. The phasing will enable the Council to respond to economic trends and market signals for different uses, which will improve the efficiency and accuracy with which the required development can be delivered across the whole of the allocated site.

The recent changes to the General Permitted Development Order, which introduced new rules allowing the change from B1 office use to C3 residential use, will further support the Council’s delivery of housing. The Council, when consulted, did not raise any objection to the proposed General Permitted Development Order changes and has therefore not opted out of the changes. As indicated by the recent Employment Study and Update, there is an over-supply of office floorspace in the District. Given the demand for housing and the availability of office space for conversion to residential use as supported by recent GPDO changes, the Council is confident that it can deliver the required housing.

Secondary schools sites are identified in the alternative. Has there been any progress with resolving disagreement so as to opt for one certain site?

We are working with Hertfordshire County Council on a Statement of Common Ground in regards to education provision. Due to the holidays it is likely that this will be finalised at the beginning of September.

It is acknowledged that one or possibly two sites are likely to be needed over the plan period but due to the difficulty in educational planning it may be that only one site will be developed over the Plan period to 2026.

It is the Council’s intention that three sites are allocated for secondary education, one in the east of the District in Croxley Green (Site S(d)) and two in the south west, in Mill End/Maple Cross (Sites S(a) and S(b)).

Due to the difficulties in educational planning it is envisaged that at least one site will be developed in the first part of the plan period (2015-2018) and a further site needed at the end of the plan period depending on the needs at that time. It is anticipated that Site S(d) will be progressed initially by the County Council.

As stated in the Site Allocations document the Council is of the opinion that Site S(b) (Froghall Farm and Adjoining Land) should be allocated in addition to the County Council’s preferred site (Site S(a)) to provide flexibility whilst further investigations and liaison with landowners takes place on all sites.
It is anticipated that Hertfordshire County Council will be in a position to update the Council on these investigations in the process of drawing up the Statement of Common Ground over the coming weeks.

Last, but by no means least at this stage, as this is potentially a matter which goes directly to soundness, I am writing to seek clarification and elucidation of the manner in which you propose to alter the Green Belt boundary. There are two aspects to this – the actual mechanics of the proposed changes and the longevity of the altered boundary.

Policy CP11 of the Core Strategy states that the Site Allocations Development Plan Document will make minor revisions to detailed boundaries of Green Belt around the main urban area to accommodate development needs.

In accordance with Core Strategy Policy CP2, housing sites have been phased so that the most sustainable and deliverable sites are developed earlier, and less sustainable sites, including those in the Green Belt, are phased for development later in the plan period.

Core Strategy Policy CP2 sets out that the phasing of sites will be reviewed annually as part of the Annual Monitoring Report taking into account delivery of sites. This means that if windfall sites are granted planning permission and are delivered, this can be taken account of in assessing the supply of housing and the requirement to release Green Belt sites for development. The intention is to prevent any future unnecessary development/changes in the Green Belt, which the Council and residents of the District place great importance, as shown in the representations received as part of previous consultations.

It was not the intention to prevent development of these sites should they be required in the future. Indeed, the granting of planning permission for the 425 dwellings on the Leauesden site demonstrates this. (For clarification, these dwellings have not been 'double counted' with the current five year land supply claimed as suggested in the representation 60265/30058/H8/2).

However, we acknowledge that this approach will result in the Council weighing any potential harm to the Green Belt against other considerations so as to establish whether or not there were any special circumstances to justify development at the application stage, which according to the recent Ministerial statement on 1 July 2013, is not an approach the Government supports.

In order to address some of your concerns and to ensure that that the document is in general conformity with the adopted Core Strategy, we propose the following amendments which are detailed in Appendix 1:

- Remove the Green Belt designation from Site H (8) to form a defensible boundary adjacent to Site GB (1)
- Remove the Green Belt designation from the employment sites and housing sites at the edge of the Green Belt Boundary that are phased for development in beginning of the Plan period which are detailed in Table 1 below:

<table>
<thead>
<tr>
<th>Site Ref.</th>
<th>Phasing</th>
<th>Indicative Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site H (3)</td>
<td>Kings Langley Employment Area (also Site E (e))</td>
<td>2012-2026</td>
</tr>
<tr>
<td>Site H (4)</td>
<td>Mansion House Farm</td>
<td>2016-2020</td>
</tr>
<tr>
<td>Site H (7)</td>
<td>Furtherfield Depot</td>
<td>2016-2020</td>
</tr>
<tr>
<td>Site H (17)</td>
<td>Branksome Lodge</td>
<td>2016-2020</td>
</tr>
<tr>
<td>Site H (27)</td>
<td>Depot, Stockers Farm Road</td>
<td>2016-2020</td>
</tr>
<tr>
<td>Site H (33)</td>
<td>Little Furze School, South Oxhey</td>
<td>2012-2015</td>
</tr>
<tr>
<td>Site E (d)</td>
<td>Maple Cross/Maple Lodge Employment Area</td>
<td>N/A</td>
</tr>
</tbody>
</table>
The sites, detailed in Table 2 below, are phased for the end of the Plan period. It is the Council’s intention to monitor the need for these sites (as set out in Core Strategy Policy CP2) and review the phasing dates accordingly. To remove the Green Belt designation from these sites at this time could result in development coming forward too early due to pressure from the development sector. Whilst the Council acknowledge that it is likely that development within the Green Belt will be necessary later in the plan period, it is also possible that more windfall sites within the urban area will come forward earlier in the plan period and/or more dwellings than anticipated will be delivered on other sites thus negating the need to release further land from the Green Belt later in the plan period.

For example, the Council are expecting a planning application in the next few months that, if approved, will result in an additional 76 dwellings in the urban area by 2016. The South Oxhey Regeneration Scheme is now likely to include an additional 98 dwellings than indicated in the document.

The importance of the Metropolitan Green Belt to the residents of the District is evident from the many representations that have been received in response to the consultations on the Core Strategy and the Site Allocations document over the last few years and as such is an important issue for the Council.

Given the importance the Government attaches to the Green Belt (Paragraph 79 of the NPPF) we think this approach to protecting the Metropolitan Green Belt should be supported.

<table>
<thead>
<tr>
<th>Site Ref.</th>
<th>Phasing</th>
<th>Indicative Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site H (13)</td>
<td>Killingdown Farm</td>
<td>2021-2026 30</td>
</tr>
<tr>
<td>Site H (28)</td>
<td>Land South of Tolpits Lane</td>
<td>2021-2026 50</td>
</tr>
<tr>
<td>Site H (37)</td>
<td>Land at Heysham Drive</td>
<td>2021-2026 50</td>
</tr>
<tr>
<td>Site H (38)</td>
<td>Land rear of Lytham Avenue</td>
<td>2021-2026 20</td>
</tr>
</tbody>
</table>

The sites, detailed in Table 3 below, are previously developed sites (brownfield) that are ‘washed over’ by the Green Belt. As such, paragraph 89 of the NPPF applies which sets out forms of development that is not inappropriate in the Green Belt including:

- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

It is the Council’s opinion that these sites can be delivered despite the Green Belt designation in line with the NPPF and as such should remain designated as Green Belt.

<table>
<thead>
<tr>
<th>Site Ref.</th>
<th>Phasing</th>
<th>Indicative Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site H (1)</td>
<td>Adjacent 65 Toms Lane (PDL)</td>
<td>2016-2020 10</td>
</tr>
<tr>
<td>Site H (2)</td>
<td>Land at Three Acres, Toms Lane (PDL)</td>
<td>2016-2020 20</td>
</tr>
<tr>
<td>Site H (6)</td>
<td>Leavesden Pumping Station (PDL)</td>
<td>2016-2020 15</td>
</tr>
<tr>
<td>Site H (10)</td>
<td>Langleybury House/School (PDL Development Brief )</td>
<td>2016-2020 20</td>
</tr>
<tr>
<td>Site H (11)</td>
<td>Royal British Legion (Rural Exception Site)</td>
<td>2012-2015 10</td>
</tr>
</tbody>
</table>
School Sites

Consideration has been given to remove the Green Belt designation from the anticipated building footprint which has been detailed in the SALDD. These were based on the Site Assessments that Hertfordshire County Council (HCC) submitted as part of the Site Allocations Issues and Options consultation in November 2010 and are only indicative at this stage.

There are a number of issues connected with removing the Green Belt designation from these sites. There have been a number of schools that have been closed in the District in the past which include:

- Durrants Secondary School, Croxley Green, (closed 1991)
- Little Furze Primary School, South Oxhey (closed 2004)
- Sir James Altham Secondary School, South Oxhey (closed late 1980's)
- William Penn Secondary School, Mill End (closed 1986)
- Langleybury Secondary School, Langleybury (closed 1996)

Our concern is that if the Green Belt designation is removed from the proposed sites and the allocations are not taken forward by HCC or other education providers or, after a relatively short period of time it, is decided that they are surplus to requirements that they will come under pressure from developers to be used for housing sites.

Not least there are difficulties in education planning and forecasts change rapidly as stated in Hertfordshire County Council’s ‘Meeting the Rising Demand for School Places’:

‘Forecasts one year ahead are generally accurate. But inevitably, the further into the future the forecasts look, the less their accuracy especially at a very local level. For these reasons it is essential to continually review proposals for additional or reduced places to make sure they are best tailored to meet the changing forecast of demand.’

In addition there are other education providers, such as Free Schools which have their own design standards that require less built up areas. As HCC will not be building the school it is likely that the indicative build areas are actually larger than will be required.

There is also consideration to be given to the implications on future needs now that the Reach Free School in Rickmansworth is due to open in September 2013.

As stated previously we are committed to working closely with HCC on education provision and are proposing allocating sites for educational use to ensure that the education authority have some flexibility in providing schools in the future and to help ensure that the land value is kept low to aid in the compulsory purchase of the sites as necessary.

It should also be noted that the following schools are in the Green Belt and the designation has not prevented development of these sites:

**Primary Schools**

- Maple Cross JMI, Denham Way, Maple Cross
- Chorleywood JMI, Stag Lane, Chorleywood
- Christ Church, Church of England, Rickmansworth Road, Chorleywood
- St Mary’s Church of England, Stockers Farm Road, Rickmansworth
- Rickmansworth Park JMI, Park Road, Rickmansworth
- St Joseph RC JMI, Ainsdale Road, South Oxhey
- Bedmond Village Primary and Nursery School, Meadow Way, Bedmond
- St Catherine of Siena RC JMI, Garston
- St Pauls C of E Primary, Langleybury Lane
- Sarratt C of E, The Green, Sarratt
Secondary schools

- Parmiter’s School, High Elms Lane, Garston
- St Michaels’s Catholic High School, High Elms Lane, Garston
- Francis Coombe Secondary School, Horseshoe Lane
- St Clements Danes School, Chenies Road, Chorleywood

The Statement of Common Ground that we are currently working on with HCC will touch on a number of these concerns.

In light of the above, we propose not to remove the Green belt designation from the indicative build area at this stage but to discuss the merits of doing so following the completion of the Statement of Common Ground at the examination hearings.

Longevity of Green Belt Boundary

Further to the clarification on this matter in your letter of the 30 July 2013 and its complexity, I will respond to this issue and provide the additional information requested in a separate letter prior to the 7 August 2013.

I hope the above clarifies the Council’s intentions, but if there is any further information required please do not hesitate to contact me.

Yours sincerely,

Claire May MSc MRPI
Principal Planning Officer
APPENDIX 1
AMENDMENTS TO GREEN BELT

Site H(3)/ Site E(e) Kings Langley Employment Area
Site H(33) Little Furze School, South Oxhey

Site E(d) Maple Cross/ Maple Lodge Employment Area
Site H(8) Leavesden Aerodrome