

THREE RIVERS SITE ALLOCATIONS DPD EXAMINATION

On behalf of Transport for London, Commercial
Development Directorate

Respondent Number: 6018 2/300 48/SA

Issue 1

30 September 2013

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ISSUE 1: WHETHER THE SALDD HAS BEEN POSITIVELY PREPARED AND WHETHER, OVERALL, IT WILL DELIVER SUSTAINABLE DEVELOPMENT IN ACCORDANCE WITH THE BROAD THRUST OF THE NATIONAL PLANNING POLICY FRAMEWORK ('THE FRAMEWORK') ?

- 1.1 CBRE Limited (CBRE) is instructed by Transport for London Commercial Development Directorate, Property (TfL Property).
- 1.2 CBRE has prepared evidence statements in respect of a number of Issues (Issue 2, Issue 3, Issue 4, Issue 6 and Issue 7). Given the structure of the Inspector’s questions under Issue 1 we have not repeated the substance of the case within this Statement but made reference to our other Statements.
- 1.3 This Statement responds to the Inspector’s Questions 1.2, 1.3, 1.4, 1.6 and 1.7.

Q1.2 : Whether the strategy which aims to meet objectively assessed requirements.

- 1.4 TRDC’s approach to secondary education provision is not considered to be based on a strategy which aims to meet objectively assessed requirements. As set out in our response to Issue 4, HCC/TRDC have not presented sufficient evidence to justify their strategy or the education requirements they identify.

Q1.3 : Whether the strategy for allocating sites is adequately justified as the most appropriate, when considered against reasonable alternatives in the context of the Core Strategy and the more recent publication of the Framework.

- 1.5 The strategy for allocating sites is not considered to be adequately justified as the most appropriate approach when considered against reasonable alternatives in the context of the Core Strategy and the Framework.
- 1.6 Firstly, for the reasons set out in detail in our Issue 4 Statement, in relation to education site allocations we consider:
 - HCC/ TRDC have not presented sufficient evidence to justify their position that the projected secondary school deficit represents objectively assessed infrastructure requirements.
 - HCC/TRDC have not demonstrated that the proposed allocation represents the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- 1.7 It is considered that secondary education needs could be met through a more appropriate alternative approach which does not necessarily require the delivery of two new secondary schools. However, taking a conservative approach it is considered prudent to allocate one 8-10FE school at Mill End (Site S(a)) and allocate a reserve site at Site S(d) for a 6FE school, to be released should the expansion potential of existing sites not be realised.
- 1.8 TRDC’s approach to the retention of the allocated secondary school expansion sites and new school sites in the Green Belt is not considered to be adequately justified as the most appropriate strategy when considered against reasonable alternatives in the context of the Framework, as set out in detail in our Issue 2 Statement.

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- 1.9 Secondly, in relation to housing site allocations, for the reasons set out in detail in our Issue 6 Statement, the strategy for allocating housing sites is not considered to be adequately justified as the most appropriate when considered against reasonable alternatives. We consider that some allocated sites are not developable (either at all or to the extent proposed by TRDC) and that there are more appropriate alternative sites which have either not been assessed or have been assessed, and despite scoring well and being located in sustainable locations, have been discarded. In addition, TRDC has not adequately planned for the provision of, and identification of, appropriate safeguarded sites necessary to provide flexibility and ensure the longevity of the Green Belt boundary, as set out in detail in our Issue 2 Statement. There is therefore evidence that there are reasonable alternatives which are more appropriate in the context of the Core Strategy and Framework.
- 1.10 The strategy for allocating both secondary education and housing sites in the SALDD is therefore not considered to be justified as the most appropriate strategy when considered against reasonable alternatives and as such cannot be considered ‘sound’ as required by paragraph 182 of the Framework.

Q1.4 : Whether the SALDD can be confidently expected to effectively deliver the planned development on the allocated sites over the years to 2026.

- 1.11 The SALDD as prepared cannot confidently be expected to effectively deliver the planned development on the allocated sites over the years to 2026. For the reasons set out in our Issue 2 Statement relating to Green Belt release and the need to plan for safeguarded land to meet housing needs well beyond the plan period as required by paragraph 85 of the Framework; in our Issue 4 Statement relating to secondary education provision and the need for Green Belt release; and our Issue 6 Statement relating to the SALDD’s inadequacies in relation to housing delivery, it is considered that the SALDD is not deliverable over the plan period and as such cannot be considered ‘sound’.

Q1.6 : Whether the SALDD is sufficiently responsive and flexible to achieve the required amount of sustainable development over the plan period.

- 1.12 The SALDD as currently prepared does not provide sufficient flexibility to deliver the TRDC’s housing target of 4,500 units. The SALDD is not considered capable of meeting the housing target in this plan period. A number of the allocated sites are not considered developable either at all or in part. Nor is the SALDD considered capable of responding to changing circumstances such as delays in the delivery of complex, brownfield regeneration proposals such as South Oxhey.
- 1.13 As currently prepared it is considered that the SALDD would not deliver TRDC’s housing target in a planned approach. The changes¹ suggested by TRDC to identify 4 sites, totalling 150 dwellings, which had been allocated for delivery in the plan period, and subject to a phasing policy, to instead be identified as safeguarded sites, is not considered an appropriate response.
- 1.14 Overall the SALDD is not considered to be in accordance with the Framework as it fails to provide sufficient sites to deliver the required amount of sustainable development across the plan period to deliver TRDC housing requirements, nor does it identify sufficient sites to be safeguarded for beyond the Plan period. It is considered that this lack of flexibility will result

¹ TRDC Letter 8 August 2013

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in the Green Belt boundary not being capable of enduring during and beyond the Plan period.

Q1.7 : Whether the SALDD is complementary to and consistent with the Core Strategy and the Development Management Polices Local Development Document (DMPLDD).

- 1.15 The SALDD as prepared is not considered to be consistent with the Core Strategy or the Development Management LDD.
- 1.16 As set out in our Issue 6 Statement and associated Appendix², a number of housing sites allocated are considered not to accord with the Core Strategy Spatial Strategy and Policy CP2 in terms of the allocation of housing sites in the most sustainable locations. In addition, a number of sites allocated are not considered to accord with Policy CP12 and DM1 in terms of the Council’s policy to resist development proposals in backland locations, with unsuitable access and servicing arrangements, and inappropriate layouts and density of development. The SALDD therefore is not considered consistent with the Core Strategy in meeting the identified housing target for the District.
- 1.17 The SALDD as prepared together with TRDC’s suggested amendments³ are not considered to be consistent with the Core Strategy in terms of the Framework’s⁴ approach to the safeguarding of land to ensure the Green Belt boundary is capable of enduring beyond the plan period. Our case is set out in detail in our Issue 2 Statement.
- 1.18 Given the above, it is considered that the SALDD cannot be considered to be complementary to and consistent with the Core Strategy and Development Management LDD, and as such cannot be considered to be ‘sound’.

CONCLUDING STATEMENT

- 1.19 The SALDD as currently prepared is not considered to be sound as required by paragraph 182 of the Framework as it is not considered to be:
 - Positively prepared because the secondary education needs have not been shown to be ‘objectively assessed’ as set out in our Issue 4 Statement.
 - Justified because it does not represent the most appropriate strategy when considered against reasonable alternatives with regards Green Belt release and safeguarded land provision, as set out in our Issue 2 Statement, secondary education provision, as set out in our Issue 4 Statement, and housing allocations, as set out in our Issue 6 Statement.
 - Effective and deliverable over the plan period because it does not identify sufficient suitable, available and viable housing sites, as set out in our Issue 6 and Issue 7 Statements and does not remove from the Green Belt secondary education sites and housing sites required to meet the needs of the plan period, as set out in our Issue 2 Statement.
 - Consistent with national policy because it does not enable the delivery of sustainable development in accordance with the policies in the Framework, as it fails to adequately provide for safeguarded housing land; fails to remove sites from the Green Belt needed

² CBRE Town Planning Assessment

³ TRDC Letter 8 August 2013

⁴ Framework paragraph 85

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to ensure delivery of both education and housing during the plan period, and allocates housing sites which do not ensure the delivery of sustainable development in the District, as set out in our Issue 2, Issue 4 and Issue 6 Statements.

- 1.20 It is considered that the SALDD is capable of being made sound through amendments outlined in detail in our Issue 2, Issue 4 and Issue 6 Statements.