

THREE RIVERS DISTRICT COUNCIL EXAMINATION OF SITE ALLOCATIONS LOCAL DEVELOPMENT DOCUMENT

FURTHER WRITTEN STATEMENT ON BEHALF OF BANNER HOMES LTD

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

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QUESTION 1.3 – 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.

- 1.1 The strategy for the allocation of sites within the SALDD has understandably, and correctly, been informed by a combination of the Spatial Strategy set out within the adopted Core Strategy, and the content of the Framework.
- 1.2 The Spatial Strategy of the Core Strategy requires the focus of development within existing urban areas on previously developed sites, and this has been achieved through the identification of the majority of allocations within such locations at Rickmansworth, Abbots Langley, Croxley Green, South Oxhey and Kings Langley. The comprehensive SHLAA process ensured that all promoted urban sites were properly assessed and all potential for the introduction of residential sites to such urban areas was properly examined.
- 1.3 The Core Strategy recognised that there would be insufficient capacity within the urban areas of the settlements to properly accommodate the Council's housing requirement through the Plan period. As a result, the Core Strategy recognised that there would be a need to review boundaries of the Green Belt at the edge of existing settlements within the district. The subsequent allocation of existing Green Belt sites at the edge of existing settlements within the SALDD therefore similarly accords with the spatial strategy set out within the Core Strategy.
- 1.4 The Core Strategy's Spatial Strategy also referred to development sites being identified having regard to a criteria based approach. As clarified within Appendix 2 of the Core Strategy, whilst such criteria were intended to help inform the Council's final decision on site allocations, reference was made to the fact that the Council would also consider each site on its merits and take into account site specific circumstances. The Council have subsequently undertaken such detailed criteria based assessments to inform the SALDD, albeit, as recognised within the Core Strategy, final decisions on allocations have allowed for the specific circumstances and merits of individual sites.

- 1.5 The strategy for allocations within the SALDD is therefore considered to properly adhere to the requirements of the Core Strategy. Given the publication of the Framework after the adoption of the Core Strategy, it is also necessary to assess such a strategy against the more recent document. The strong encouragement of sustainable development as set out within the Framework is considered to support the SALDD approach of attempting to introduce the majority of allocations towards the urban areas within the district. In pursuing sustainable development, paragraph 9 advises that this should include improvements to the conditions in which people, live, work, travel and take leisure. Such encouragement is considered to support the Council's approach within the SALDD of including consideration of specific sites' circumstances and merits when confirming allocations, as will be enhanced upon in response to question 6.1.
- 1.6 Paragraph 10 of the Framework also highlights the importance of taking proper account of site specific circumstances and merits when allocating development. It comments that;
- "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas".*
- 1.7 When setting out a number of core planning principles, paragraph 17 also recognises the importance of taking account of the impact of proposed developments on the local community. Reference is made to the fact that planning should, *"not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives"*.
- 1.8 A strategy of assessing sites against set criteria, but then allowing for site specific circumstances and impacts to be taken into account before site allocations are determined, as has taken place within the SALDD, is therefore considered to gain support from guidance set out within the Framework.

- 1.9 With regards to potential alternative strategies, it is noted that paragraph 52 of the Framework refers to the potential for new settlements, or extensions to existing villages and towns that follow the principles of Garden Cities, to be a solution to the supply of new homes. It is understood that no proposals for such a scale of development as referred to in paragraph 52, have been put forward to the Council for consideration. The “alternative sites” being promoted are not of sufficient scale to bring forward the sustainability benefits and community development principles intended from such a large scale of development. The SALDD therefore correctly makes no allowance for the incorporation of such sites within the Allocation Strategy.
- 1.10 Given that the Allocation Strategy within the SALDD adheres with the requirements of both the Core Strategy and the Framework, this element of the document is considered sound and no amendments to it are recommended.

QUESTION 1.4 – WHETHER THE SALDD CAN BE CONFIDENTLY EXPECTED TO EFFECTIVELY DELIVER THE PLANNED DEVELOPMENT ON THE ALLOCATED SITES OVER THE YEARS TO 2026.

- 1.11 It is noted that some of the allocated sites expected for delivery by 2015 may be complex to bring forward, such as Site H24 relating to the Gasworks Redevelopment. Allocations also include some sites on which the relocation of the existing use needs to occur prior to any residential development taking place (Sites H29 and H30). There is therefore a degree of doubt with regards to the timing of the delivery of some of the sites.
- 1.12 The Council will presumably provide further evidence with regards to the likely and intended progress of such sites, with the support of the individual promoters and this may provide comfort to the Inspector on the matter.
- 1.13 Due to the inevitable element of doubt that will exist when so many separate sites outside of the control of the Council are allocated for development, it is essential that great flexibility is applied to the allowed delivery of sites during the plan period. This will ensure that sufficient sites can be brought forward at the appropriate time to enable the required delivery throughout the plan period, and provide reasonable expectation of the allocated sites effectively delivering the necessary numbers by the end of this period.
- 1.14 Subject to the phasing recommendations set out in response to Questions 1.8, 2.4 and 6.9, being introduced, the SALDD can therefore be expected to deliver the planned development to 2026, and no changes to this element of the document are necessary.

QUESTION 1.8 – WHETHER IT IS NECESSARY OR APPROPRIATE FOR THE SALDD TO DEPART FROM THE PRINCIPLES CONTAINED WITHIN THOSE DOCUMENTS (CS AND DMPLDD) AND IF SO, TO WHAT DEGREE?

- 1.15 Policy CP2 of the Core Strategy includes reference to a phasing strategy for the development of sites. It advises that;

"Indicative phasing of sites may be altered having regard to the Annual Monitoring Report and up to date information on the delivery of specific sites. This may result in sites coming forward and/or sites being set back over the Plan period".

- 1.16 Such an approach is not considered to adhere with the requirements and intentions of the Framework. Whilst much reference is made to the supply of housing within the Framework, including paragraphs 47 – 50 and 156 – 159, no reference is made to the need to restrict or limit the amount, and timing of, such development. Instead, the underlying intention relating to housing within the Framework, as highlighted in the introduction at paragraph 47, is to significantly boost the supply of housing. To attempt to restrict the introduction of identified allocated sites until after a certain time period, or not at all if the Annual Monitoring Report indicates they are not needed to achieve a five year housing land supply, goes completely against the spirit of the Framework.

- 1.17 The great variety of allocated sites and associated specific circumstances relating to them means that they will naturally come forward at different times during the Plan period, and when combined with commercial market awareness, will ensure that there is not any significant oversupply at any time.

- 1.18 Paragraph 154 of the Framework advises that;

"Local plans should set out the opportunities for development and clear policies on what will or will not be permitted and where".

- 1.19 The introduction of phasing requirements that are susceptible to change every year, based upon the findings of the Annual Monitoring Report, does not provide the level of clarity or certainty which the Framework encourages.

- 1.20 Given that the phasing approach set out within the Core Strategy is not in accordance with the subsequently released Framework, it is considered that the SALDD should not repeat it, and its inclusion of such a phasing strategy is not sound.
- 1.21 To address the matter Policy SA1 should be amended to remove the 4th paragraph, beginning; *'Proposals for the.....'*, and the specific housing allocations should not include a Phasing entry within the table.