

Three Rivers Site Allocations LDD

EXAMINATION IN PUBLIC

Written Statement On Issue 6: Housing

For Gade Investments Ltd

September 2013

Prepared by

**HOWARD SHARP
& PARTNERS**

**79 Great Peter Street
Westminster
London
SW1P 2EZ**

T 020 7222 4402

F 020 7233 0762

E london@howardsharpandpartners.com

1. INTRODUCTION

- 1.1 We act for Gade Investments Ltd and have previously submitted objections that are asking for specific changes to the Three Rivers Site Allocations Local Development Document (SALDD).
- 1.2 Gade Investments Ltd own a key development site at Railway Terrace within the Kings Langley Employment Area proposed for allocation under Policy H(3) of the SALDD. This site is specifically referred to in the Council's letter of 31 July to the Inspector.
- 1.3 Gade Investments Ltd is seeking changes to the SALDD to ensure that it provides satisfactorily for the amount and type of housing proposed by the Core Strategy and in the locations in which the latter intends it should be developed.

2. THE INSPECTOR'S QUESTIONS

Q6.2 Whether the availability, suitability and viability of each of the allocated housing sites is based on firm knowledge or, alternatively, realistic assumptions informed by credible evidence.

- 2.1 In the case of Kings Langley Employment Area H(3) the amount of housing proposed represents only a small proportion of the available land area and there is a good amount of time for delivery (up to 2026). This gives adequate flexibility for the market to recycle urban land from lower demand to higher demand uses, which avoids the unnecessary release of greenfield sites for housing solely on the grounds of certainty. With this approach it is not necessary to have firm knowledge about which particular parcel of land will deliver the housing units, but instead, credible evidence that the market is likely to respond over time to the various opportunities.
- 2.2 In the case of the land north of Masters Yard owned by our client, this land is cleared and has no economic use at present, therefore it can realistically be relied on to deliver a proportion of the 150 units, probably between 30 and 40 units. A planning application is currently in preparation to bring the site forward early, which can take good advantage of its lakeside setting.

- 2.3 The dual designation of Housing Allocation H(3) with Policy E(e) Mixed Use Allocation should be removed as it confusingly implies that each site should provide a mix of uses when in fact it is the whole area that is mixed use and within that individual development sites will normally provide either residential or employment uses. Subject to the deletion or modification of Policy E(e), Policy H(3) will be effective because delivery is earmarked for the whole Plan period and covers a sufficient geographical area, as noted above.

Q6.3 Whether allocated sites currently in active use for other purposes are appropriately allocated for housing, having regard to employment and local services.

- 2.4 The Employment Study and Update (EB02 and EB04) demonstrated that some employment sites have an oversupply of units and are in poor locations. As a result, the introduction of residential uses within some employment areas is anticipated by Policy CP6 of the Core Strategy. The recycling of employment sites needs to be considered as part of the overall Spatial Strategy which includes provision of new employment space in more suitable forms and locations. The appropriate release for residential of employment sites has been assessed in EB04 in relation to employment demand over the Plan period and found not to harm the overall economic performance of the District. Encouraging a mix of uses in appropriate locations will contribute to sustainable communities and reduce the need to travel.

- 2.5 Notwithstanding the above, priority for new residential uses within existing Employment Areas should be given where sites are vacant/cleared and with no active alternative use, as is the case with the land north of Masters Yard.

Q6.4 Whether the allocated sites are broadly in the right locations.

Q6.5 Whether the allocated sites are, in practical terms, accessible.

- 2.6 The Kings Langley Employment Area – H(3) is in a suitable location for residential because it lies alongside a secondary centre identified in the Core Strategy and close to several key centres. Secondary centres have an important role in meeting local needs and Kings Langley is strategically well located within the road and rail network. The urban, previously

developed character of the Employment Area also gives it a locational advantage over greenfield sites.

Q6.6 Whether the density assumed for each site is a realistic and appropriate reflection of its potential, having regard to social, environmental and economic considerations and the explicit intentions of Core Strategy policy CP3.

- 2.7 Although not a soundness issues, up to 50 dwellings per hectare for H(3) would be a more realistic and appropriate reflection of the potential of our client’s site north Masters Yard, where it overlooks the lake and faces existing housing on one side.

Q6.13 Whether, having regard to the above matters, alternative and/or additional housing sites should be allocated for release during the plan period, so as to meet the requirements and intentions of the Core Strategy and the Framework.

Q6.14 Whether, in this context, specific alternative and/or additional housing sites advanced by objectors to the SALDD have decisive merits.

- 2.8 The 150 units specified for the whole of the Kings Langley Employment Area H(3) is considered to be too low. The Employment Land Update (EB04 p40) notes that the northern section (either side of the lake off Railway Terrace) is generally underused, has already undergone recent redevelopment for uses including residential and the local road system is unsuited to sustaining employment uses. The Council’s letter of 31 July to the Inspector confirmed a number of sites within Kings Langley Employment Area with developer interest for residential uses, including our client’s site.

- 2.9 Therefore, to meet the NPPF policy to encourage the effective use of land by reusing land that has been previously developed (paras 17 and 111) the Plan should seek to positively encourage the recycling of land within Kings Langley Employment Area in preference to housing sites in less sustainable greenfield locations. The number for H(3) should be raised to at least 200 and if additional housing sites are to be allocated, these should be phased towards the end of the Plan period and only if needed to meet an anticipated shortfall in housing supply and with the caveat that new sites should not unduly impact on other sites coming forward in accordance with the Spatial Strategy.

3. CONCLUSION

3.1 The Written Statement for Issue 2 addresses the Green Belt designation and this is not covered as part of this Statement.

3.2 The parts of the SALDD that are are considered unsound in relation to issue 6 are as follows:

- The allocation of 150 dwellings for the whole of the Kings Langley Employment Area H(3).
- A dual designation of Mixed Use Allocation E(e) and Housing Allocation H(3).

3.3 The reasons why they are considered unsound are as follows.

- 150 dwellings is considered to be too low for the whole of the Kings Langley Employment Area given the evidence of current developer interest. It is not the most appropriate strategy to encourage the effective use of land by reusing land that has been previously developed as anticipated by the NPP. As such, it does not meet the 'consistent with national policy' test.
- A dual designation of Mixed Use Allocation and Housing Allocation H(3) is not considered appropriate for the Kings Langley Employment Area E(e). It is likely to inhibit recycling of low demand employment active employment uses and vacant buildings/sites because it implies each site must deliver a mix of uses. As such, it does not meet the 'justified' and 'effective' tests.

3.4 The SALDD can be made sound by:

- Allocating at least 200 dwellings for the whole of the Kings Langley Employment Area H(3).
- Removing the dual designation of Mixed Use Allocation E(e) and Housing Allocation H(3) in favour of a single Housing Allocation.