



Hertfordshire County Council

Representations in respect of allocated housing sites in the Three Rivers District Council Site Allocations Local Development Document 2013.

This document responds to comments, objections and correspondence submitted to the Examination in Public in respect of the TRDC SALDD. The note updates earlier comments and includes the County Council's up to date position in respect of the sites listed below. Each site will be considered in order and will detail the respective planning position with regard to the identification, allocation and status of the sites for residential development taking particular account of changes to the approach to them in respect of the Green Belt and the Councils correspondence with the Inspector from July and August 2013.

- i) The former Little Furze Primary School, South Oxhey **TRDC site H33**
- ii) Land at The Fairway, Green Lane, Oxhey Hall. **TRDC Site H30**
- iii) Anson House/Northwick Day Centre, South Oxhey. **TRDC Site H35(Part)**
- iv) Grazing Land, Foxgrove Path, South Oxhey. **TRDC Site H 37**
- v) Land Rear of Lytham Avenue, South Oxhey **TRDC Site H 38**

Former Little Furze School, South Oxhey

- 1.1 The former Little Furze Primary (JMI) school has been vacant for over seven years following a review of primary school provision and was declared surplus to needs by the County Council at that time. The County Council has carried out extensive work into the need for school places across the district over the plan period and has confirmed that there is no need to re-use this site for education purposes. Should a need arise for additional education provision a reserve site on land adjacent to St Joseph's school close to this site for expansion or additional provision as required but not currently anticipated. There has been no formal interest in this site from bodies seeking to form or open free schools.
- 1.2 The existing school buildings on the site are in poor condition and beyond economic repair. The buildings would fail to provide a satisfactory learning environment and the configuration, over several floors would not meet current school requirements.
- 1.3 The site has been promoted for residential development throughout the plan process and Three Rivers District Council have, in their letters to the Inspector of July 2013 and August 2013 in relation to this site advised that it is to be taken out of the Green Belt as a part of the Site Allocations Process.
- 1.4 Hertfordshire County Council supports the position of Three Rivers in this respect and is pleased to see that the District has responded to the Inspectors concerns in this regard and proposed to remove the site from the Green Belt.
- 1.5 It is clear from the District Council's work that allocations for housing land within the district will necessarily involve allocations of sites previously in the Green Belt as there is insufficient land within the urban areas and outside of the Green Belt to satisfy need and demand for housing throughout the plan period.
- 1.6 The Little Furze site represents an area of previously developed land closely associated with, and on the edge of the urban area of South Oxhey and its allocation, as brown field land satisfies the sequential approach to site selection for housing allocations throughout the plan period. The site is vacant and available for development now and can provide a discrete development area separate from surrounding sites which have been identified to have high ecological value.
- 1.7 Since the site was made vacant it has been managed by Lambert Smith Hampton and the grass has been cut and existing landscaping maintained. In this regard it has no intrinsic ecological value of itself and this has been confirmed by surveys. Whilst the site includes a number of significant tree specimens feasibility studies have been carried out by the County Council to demonstrate that it can be developed to achieve the identified housing capacity whilst retaining key tree specimens.

- 1.8 The County Council supports the TRDC allocation which identifies that measures will need to be built in to any development of the site to ensure that the ecological value of adjacent designated ecology sites is maintained.
- 1.9 HCC are aware of the comments submitted by Taylor Wimpy in respect of this allocation and criticism that the site failed to score as highly in the Council's sifting exercise as the site they seek to promote. Their position fails to take account of the spatial aspect of housing need across the district and agreed in the Core Strategy. South Oxhey, because of its demographics and character is likely to see significant growth in housing need throughout the plan period and this site allocation goes a significant way toward meeting that need in this part of the district. An allocation of land elsewhere (Kings Langley) would be unlikely to satisfy the identified demand for housing in this part of the district. Hertfordshire County Council support the District Council's allocation of this site and endorse the spatial strategy behind the proposals set out as a part of the formulation of the Core Strategy.
- 1.10 The site boundary identified encompasses both the school buildings and the playing fields of the former school. This is a reflection of the need for additional land for housing and will lead to the creation of a well understood and defensible boundary for the new Green Belt boundary in line with the advice of the NPPF.
- 1.11 The site adjoins and abuts residential areas, is close to shopping facilities and community facilities and lies within a significant residential area. Its use for housing or as an extension to housing in this area is entirely sustainable.

The Fairway, Green Lane, Oxhey Hall

- 2.1 The Fairway is an elderly persons care home . The site has been identified to provide residential development. In a report to the HCC Council in 2005 it was identified that the building no longer provides facilities that people nowadays expect. It was then agreed that the facility would be re-provided .
- 2.2 Prior to any redevelopment of this site alternative provision for the elderly persons care home will be made on an alternative site within the Oxhey Area. (Feasibility work has been done in relation to development of part of the Little Furze site for this provision).
- 2.3 The nature of this provision means it is not possible to redevelop on-site as there is a need to decant existing residents into a new facility before this one can be released. Allocation of this site for housing development will enable a chain to be established where a new site can be found and developed, the existing tenants relocated and then this site released for housing to fund the re-provision elsewhere in purpose built accommodation that meets modern standards and requirements.
- 2.4 Rickmansworth Residents Association have queried the scale of development allocated to this site. Hertfordshire County Council are confident that the site can be developed to fulfill the site allocation requirements and earlier feasibility work has demonstrated this. This site cannot be considered as backland or infill having as it does an extensive street frontage to both Green Lane and The Highlands. The reference in the objection (60071/30024/H30/C60152/30041/H30/2 may be erroneous?) refers to the wrong streets and sites (Harefield Road and Stockers Farm).

Anson House and Northwick Day Centre, Northwick Road, South Oxhey

- 3.1 These sites comprise two buildings once used for delivery of community services. Anson House is a four storey office building which lies vacant having been taken out of use some years ago. The building is no longer in a condition where it could economically be returned to a viable community use. Northwick Day Centre lies adjacent to Anson House and is still partially in use although again it has reached the end of its useful life.

- 3.2 The services offered from the day centre will be re-provided for, most likely in the redevelopment of South Oxhey Town Centre. This site is isolated from the remainder of the town centre and lies two streets to the south-west of the centre in a residential area. It makes good sense if the community facilities are re-provided in the community hub that will form a part of the new centre enabling the release of this site for residential development.

- 3.3 We are not aware of any objections to the allocation of this site for residential development and support the district council allocation.

Land to Rear of Lytham Avenue, South Oxhey

- 4.1 This site comprises a strip of open land to the rear of houses in Lytham Avenue and the Sir James Altham Swimming Pool accessed from Altham Way. The site comprises backland to the rear of the pool buildings and houses. To the south is open land and to the east are Football pitches used by the local community football team Oxhey Jets. The site in question includes a limited area of hard-standing, some open equipment storage but is otherwise overgrown.
- 4.2 The site is currently designated as Green Belt land but is proposed to be removed from the Green Belt as part of the Site Allocations DPD. Access can be readily achieved from Altham Way and the site is ready for development and available now.
- 4.3 Initially the District Council had proposed that this site be retained in the Green Belt notwithstanding its allocation for housing development. The justification behind this was that it would only come forward for housing if other windfall sites had not been identified and developed earlier in the plan period. This site is allocated to come forward between 2021 and 2026. The County Council support the change in position outlined in the District Council's letter of 8th August 2013. This change in status is strongly supported by the County Council as it gives the sites owners the certainty to plan properly for its residential development in the future.
- 4.4 It is clear that some Green Belt releases in Three Rivers will be necessary for the Council to identify an appropriate supply of housing to meet the needs of growth in the area to 2026 and this has been recognised by the Council as an exceptional circumstance that can satisfy the tests set out in the NPPF for the release of Green Belt land. Hertfordshire County Council strongly support this assessment and conclusion.
- 4.5 Releasing this site from the Green Belt will provide a more logical and sensible edge to the Green Belt in this location moving it to the established line of development to the south of the site.

Grazing Land at Foxgrove Path, South Oxhey

- 5.1 This land comprises a field used for grazing adjacent to current residential areas in the Heysham Drive area of South Oxhey. The site has a long history of allocation for development having originally been identified as a site for a primary school when the Oxhey estates were first laid out in the 1950's. As time has gone on the allocation for schools use has faded and the site has been rented for grazing on short term tenancies for some years. Land adjacent the site, running south-east to northwest was also originally set aside for roads development and this site has not been in any formal use over the same period. This land has developed ecological importance over this time and is designated as a Local Nature Reserve (LNR). The Grazing Land has not been identified as of ecological importance but measures will be required to ensure that the development of this site does not harm the ecological value of the adjacent LNR both at implementation and in the future.
- 5.2 The site is currently designated as falling within the Green Belt but the Council's letter of the 8th August confirms that the district council now propose to remove the site from the Green Belt as a part of the Site Allocations LDD.
- 5.3 Initially the District Council had proposed that this site be retained in the Green Belt notwithstanding its allocation for housing development. The justification behind this was that it would only come forward for housing if other windfall sites had not been identified and developed earlier in the plan period. This site is allocated to come forward between 2021 and 2026. The County Council support the change in position outlined in the District Council's letter of 8th August 2013. This change in status is strongly supported by the County Council as it gives the sites owners the certainty to plan properly for its residential development in the future.
- 5.4 It is clear that some Green Belt releases in Three Rivers will be necessary for the Council to identify an appropriate supply of housing to meet the needs of growth in the area to 2026 and this has been recognised by the Council as an exceptional circumstance that can satisfy the tests set out in the NPPF for the release of Green Belt land. Hertfordshire County Council strongly support this assessment and conclusion.
- 5.5 Access to the site can be achieved from Foxgrove Path and highway engineers have been appointed to carry out feasibility work to demonstrate how this will be achieved.
- 5.6 Removal of this site from the greenbelt will help in providing a firm and clear edge to the Green Belt reflecting the presence of housing to both east and west of the site whilst reflecting the southern boundary beyond which the Green Belt designation will remain.
- 5.6 Whilst objections to the allocation of this site have been received these are based on the false understanding that the existing "meanwhile" uses would continue indefinitely. This site has been identified for redevelopment and reserved for a school development

since the rest of the South Oxhey estate was laid out. There is no longer a need for additional land for a primary school in this location and any need for additional school provision for this age group can be met through an expanded St Josephs school for which land is already set aside. The mean-while use for grazing land will be able find alternative grazing on similarly utilized land to the south of the site on a normal commercial basis. Despite claims that this is the only field of its kind in South Oxhey, the land immediately to the south of the site forms a part of an extensive area of farmland that is used for grazing horses.

- 5.7 The site, whilst identified as part of the 2021-26 land supply is available from 2015 and could be brought forward earlier, in line with the redrafted District Council policy, should the need for housing to meet a five year land supply arise.
- 5.8 TRDC have been accused of allocating this site ahead of others identified by objectors to the plan despite their scoring better in the site sifting exercise carried out by the Council (Clovercourt Homes 60034/30018/SA1/2). This objection fails to take account of the spatial nature of development advocated in the Core Strategy and recognition that South Oxhey requires regeneration and investment. The scoring exercise is only a part of the overall balancing exercise to ensure that development is appropriately located around the borough to meet new housing needs in a variety of locations.
- 5.9 This objection criticism also notes that the sites are not as “sustainable” as alternatives that have not been allocated. The sites in question (Foxgrove Path and Lytham Avenue) are both contiguous with existing residential development and located close and within walking distance of all the facilities one may expect including shopping, schools social and community provision and public transport points (bus stops). All are sustainable in these key respects.
- 5.10 The local objectors suggest that there is a shortage of public open space locally and of open land available to the public. The site in question is not nor has it ever been open to the public but is rented for grazing purposes. The adjoining public footpaths which skirt the site will be maintained following any redevelopment.
- 5.11 Local objectors have also suggested that the site is part of a floodplain or is susceptible to flooding. The site does not form part of any recognized floodplain. Local ground conditions may cause localized and minimal ponding on the site in times of extreme wet weather but these can be readily addressed through an appropriate drainage strategy when the site is developed.