

THREE RIVERS DISTRICT COUNCIL EXAMINATION OF SITE ALLOCATIONS LOCAL DEVELOPMENT DOCUMENT

FURTHER WRITTEN STATEMENT ON BEHALF OF BANNER HOMES LTD

ISSUE 6: WHETHER THE SALDD PROVIDES SATISFACTORILY FOR THE AMOUNT AND TYPE OF HOUSING PROPOSED BY THE CORE STRATEGY AND IN THE BROAD LOCATIONS IN WHICH THE LATTER INTENDS IT SHOULD BE DEVELOPED

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QUESTION 6.1: WHETHER HOUSING SITES SHOULD BE CHOSEN BY "SUSTAINABILITY SCORE" AND "RANKING" OR ON THE BASIS OF THEIR SPECIFIC "MERITS".

- 1.1 The Core Strategy's Spatial Strategy 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.
- 1.2 The strategy for allocations within the SALDD is therefore considered to properly adhere to the requirements of the Core Strategy by taking account of both the sustainability score and the specific merits of a site.
- 1.3 The publication of the Framework after the adoption of the Core Strategy, also requires a strategy that includes consideration of a site's 'merits', to be considered against the more recent document.
- 1.4 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.
- 1.5 Paragraph 10 of the Framework 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".
- 1.6 When setting out a number of core planning principles, paragraph 17 also recognises the importance of taking account of the impact of proposed

- 1.7 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 If assessed on logic, independently from the content of the Framework and CS, it is also considered that the specific merits of a site have to be taken into account, rather than rely entirely on a sustainability score or ranking to determine whether a site should be allocated. As an example, a site may exist which scores incredibly well against many of the criteria but lies in a location which is liable to flood. Even if the site was one of the highest ranking when all of the scoring factors are taken into account, it should clearly not be identified as an allocation due to the danger of flooding that would result. The merits of a site need to be taken into account to ensure that there are not specific circumstances that would make the development inappropriate. It is not realistic to expect the scoring matrix to allow for, and reflect, all conceivable issues for consideration.
- 1.10 There will be some judgement calls, for example when assessing the impact upon road congestion in a locality, or the impact upon the purposes of the Green Belt, however such matters need to be taken into account and have rightly been given weight when making final decisions on allocations. The Framework makes specific reference to the purposes of the Green Belt at paragraphs 79 and 80, and it is entirely appropriate that this is taken into account when assessing what sites should be removed from the Green Belt. For example, Site H17 would enable a current Green Belt boundary disparity to be resolved, with an appropriate rounding off of the settlement that follows existing landscape boundaries, as encouraged by the NPPF. The benefit of this cannot be easily scored but is clearly worthy of consideration when assessing the site against other potential Green Belt allocations.

- 1.11 If local circumstances are not given proper weight then there is a real danger that subsequent allocations will not represent a sustainable form of development, due to specific and relevant weaknesses not being able to be sufficiently reflected by reference purely to a scoring / ranking system.
- 1.12 The approach behind the SALDD of allowing for the merits of a site to be properly taken into account when determining allocations, is therefore considered to be sound.

QUESTION 6.2: 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.

- 1.13 The Council, and associated promoters of sites will put forward evidence in this respect.

- 1.14 With regards to site H17 at Branksome Lodge, this submission is made on behalf of Banner Homes Ltd, who have a contractual interest in the site. If the site H17 is allocated within the adopted SALDD, Banner Homes Ltd would intend to submit a Planning Application for consideration as soon as the final wording of Policy SA1 allows. There are no infrastructure requirements associated with the site or any other constraint that would restrict the ability of the site to deliver housing in the short term future.

QUESTION 6.4: WHETHER THE ALLOCATED SITES ARE BROADLY IN THE RIGHT LOCATIONS.

- 1.15 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.
- 1.16 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.
- 1.17 As recognised in the supplementary allocations document prepared by the Council at the request of the Inspector, there is a small difference between the percentage of housing allocations between that set out in the Core Strategy and that proposed in the SALDD. This has occurred due to the more detailed consideration of individual sites by the Council, and associated allocations that need to take proper account of all sustainability considerations and sites merits rather than just location.
- 1.18 As a result, the broad locations for the allocations do accord with the requirements of the CS and Framework, and minor differences from the CS are justified by the more detailed level of work that has subsequently been undertaken to identify the most appropriate allocations.

QUESTION 6.5: WHETHER THE ALLOCATED SITES ARE, IN PRACTICAL TERMS, ACCESSIBLE.

- 1.19 Site H17 at Branksome Lodge, lies at the edge of Loudwater, which itself adjoins the principal town of the District, Rickmansworth. As a result the site benefits from a good, accessible relationship with the principal town which offers a level of employment opportunities, leisure and retail facilities, and public transport connections, greater than elsewhere in the District, justifying its designation.
- 1.20 There are 3 schools within approximately 1 km of Site H17 (Charlotte House School, The Royal Masonic School for Girls and York House School). As a result they offer a realistic opportunity to be accessed by cycle, or foot, albeit the route to York House does not benefit from pavement / footpath connections.
- 1.21 Rickmansworth town centre is approximately 2km to the south of site H17, so could be accessed by foot in approximately 30 minutes. Alternatively a frequent bus service operates along Chorleywood Rd, which is within 1km of site H17, and provides a direct link to Rickmansworth Town Centre, including a stop at the train / tube station.
- 1.22 Croxley Green and the associated shops, bars and schools, is only approximately 1.5km to the east of site H17, so again, realistically accessible by cycle.
- 1.23 It is acknowledged that people choosing to live at a site such as H17 will be likely to own a car. However, in this instance, the relationship with the larger settlements, in particular Rickmansworth, will offer the opportunity to make many necessary journeys without needing to use the car. It is therefore considered to be an accessible site, in practical terms, that is well related to the principal town of the District.

QUESTION 6.6 : 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.

- 1.24 With regards to H17, the suggested capacity within the SALDD is 10 dwellings. The site covers 1.01 ha, resulting in a density figure of 10 dwellings per hectare. It is recognised that the adjoining development to H17 is low density, characterised by detached properties in large plots, and that any new development will need to be considerate of, and respond to, its surroundings. However, it is questioned whether a density of 10 dwellings per hectare can be considered to optimise the potential of the site to accommodate development, as required by paragraph 58 of the Framework.
- 1.25 Whilst detailed layouts are not yet drawn up for the site, it is considered feasible to build at a density of up to approximately 15 dwellings per hectare and respond sufficiently to local character.
- 1.26 It is therefore recommended that the Dwelling Capacity figure for site H17 is amended from 10, to up to 15.

QUESTION 6.9 : WHETHER THE INTENDED PHASING OF THE ALLOCATED SITES OVER THE PLAN PERIOD IS SUFFICIENTLY CLEAR AND ROBUST TO BE EFFECTIVE AND WHETHER IT WILL, IN PRACTICAL TERMS, SERVE CORE STRATEGY AND FRAMEWORK INTENTIONS TO PROMOTE SUSTAINABLE DEVELOPMENT.

- 1.27 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".

- 1.28 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.

- 1.29 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.

- 1.30 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".

- 1.31 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.
- 1.32 Far from encouraging sustainable development, such an approach, through its uncertainty, may endanger the ability to bring sites forward as required.
- 1.33 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 therefore not sound.
- 1.34 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.

QUESTION 6.13 : WHETHER, HAVING REGARD TO THE ABOVE MATTERS, ALTERNATIVE AND /OR ADDITIONAL HOUSING SITES SHOULD BE ALLOCATED FO RELEASE DURING THE PLAN PERIOD, SO AS TO MEET THE REQUIREMENTS AND INTENTIONS OF THE CORE STRATEGY AND THE FRAMEWORK.

- 1.35 Evidence will be put to the Inspector by other parties with regards to the need or otherwise to provide additional housing numbers and sites during the Plan period.
- 1.36 If the Inspector determines that additional numbers and sites are required, it is considered essential that these are additional to, rather than in replacement of currently identified allocations within the SALDD. Submissions made in response to other questions have explained why the strategy of allocating housing sites undertaken within the SALDD is correct and sound. As a result there is no justification to remove any of the sites that have been allocated to date.
- 1.37 With regards to Site H17, it is also considered relevant to note that no objections have been made to its allocation in the submission document, unlike many of the other allocated sites. The site has been constantly assessed, and deemed to be appropriate by the Council, throughout the SHLAA, Core Strategy and now SALDD process. There has therefore been full and proper opportunity for relevant issues regarding its allocation to be assessed over a considerable time, and even if additional sites are deemed to be necessary by the Inspector, there is no justification for them to replace H17.