

Hearing Statement – Matter 1

Three Rivers District Core Strategy Examination

Western Range Ltd – Representor Reference 10017
Land South of Little Oxhey Lane and West of Oxhey Lane,
Carpenders Park, Hertfordshire
23 May 2011





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1 Introduction

- 1.1 This Hearing Statement has been prepared by Bidwells on behalf of our client Western Range Ltd in response to the Matters and Questions posed by The Planning Inspector appointed to examine the soundness of the Three Rivers District Core Strategy.
- 1.2 This Hearing Statement has been prepared by David Bainbridge, Partner in the Planning Division of Bidwells. I hold a Master of Arts Honours Degree in Town Planning obtained from Heriot-Watt University, Edinburgh. I have been a corporate member of The Royal Town Planning Institute since November 1999. I have 13 years professional planning experience gained from positions within local planning authorities and private consultancy.
- 1.3 This Hearing Statement responds to Version 9 of the Programme for Hearing Sessions, dated 19 May 2011. The same terminology used within this version is used in this Hearing Statement and therefore the Three Rivers District Core Strategy is referred to as "CS".
- 1.4 The CS has been prepared and submitted by Three Rivers District Council ("the Council") as local planning authority.
- 1.5 This Hearing Statement specifically responds to Matter 1 Overall Spatial Strategy (Spatial Strategy / Settlement Hierarchy) and Space Shaping Policies (Policies PSP1, PSP2, PSP3 and PSP4).
- 1.6 As requested by the Planning Inspector this Hearing Statement is succinct, it avoids unnecessary detail and repetition of the original representations. Only the questions as they relate to the original representations have been answered. The 3,000 word limit for this matter has not been exceeded in the preparation of this Hearing Statement.
- 1.7 Western Range Ltd owns and manages the land South of Little Oxhey Lane and West of Oxhey Lane, Carpenders Park, Hertfordshire within Three Rivers District and on behalf of our client, Bidwells, has participated in previous stages of the Three Rivers District LDF. Bidwells on behalf of our client has prepared and submitted the following representations to the Council:
- Written response to the Affordable Housing Supplementary Planning Document – deadline of 27 May 2011
 - Five Year Supply of Land for Housing Assessment Pro-Forma prepared in respect of Land South of Little Oxhey Lane and West of Oxhey Lane, Carpenders Park, Hertfordshire on 16 May 2011
 - Written response to the Site Allocations: Issues and Options consultation, dated 10 December 2010
 - Written response to the CS Proposed Submission, dated 10 December 2010

- Written response to the CS Publication, dated 23 July 2010
- 1.8 I can confirm 6 no. hardcopies of this Hearing Statement (comprising a copy for each of the 3 no. listed participants plus 3 no copies) and an electronic copy have been submitted to the Programme Officer by the deadline of midday, Tuesday 24 May 2011.
- 1.9 This Hearing Statement is submitted in the form of written representations only because Bidwells on behalf of Western Range Ltd is not attending the hearing sessions as participants. Notwithstanding this, Western Range Ltd remains a key stakeholder in Three Rivers District and will continue active engagement in the preparation of all relevant aspects of the Three Rivers District LDF.

2 Overall Spatial Strategy (Spatial Strategy / Settlement Hierarchy)

2.1 Question 1.1

To comply with PPS12 the CS must generally conform to the East of England Regional Plan and for this to be made clear in the CS. To achieve this (in part at least) the housing requirements of 200 dwellings per year to 2026 should be re-instated.

2.2 Question 1.2

The CS does not address the key issue of housing requirements and in particular it will fail to deliver adequate affordable housing to 2026 as a result (in part at least) of the proposed reduction in housing requirements to 2026.

2.3 Question 1.3

The proposed settlement hierarchy in the CS includes Carpenders Park as a Secondary Centre. Carpenders Park is assessed within the Three Rivers Settlement Appraisal, March 2010 (ref: EB12).

The score for Carpenders Park within EB12 does not accurately portray the siting, characteristics and relative sustainability of the settlement which is accessible to higher order services provided within the settlement and at near-by parts of the London Boroughs. Carpenders Park should be more accurately assessed in a revision to EB12 and be identified as a Key Centre in the settlement hierarchy in the CS.

2.4 Question 1.4

The intention of PSP2 for approximately 60% of the District's housing requirements to 2026 to be delivered at Key Centres is reasonable and along with PSP1 this should form the basis for development at the more sustainable settlements in the District. In relation to identification of Key Centres the Planning Inspector's attention is brought to the response to question 2.3, in particular that Carpenders Park be identified as a Key Centre.

2.5 Question 1.6

The provision of approximate percentages at each level of the settlement hierarchy does provide sufficient clarity about the scale of housing development for each place for the purposes of the CS. This is on the understanding 'place' in the context of the question means each settlement within the settlement hierarchy and the percentages relate to the housing requirement to 2026 (CP2).

2.6 Question 1.7

The percentages contained within PSP1 to PSP4 on their own do not provide a clear direction for allocating sites for housing development in the Site Allocations DPD. Notwithstanding this the further detail contained within the Core Policies does provide a clearer direction for the DPD.

2.7 Question 1.10

It is not known from the limb (d) how much of the approximate 60% of housing requirements is to be met at Leavesden Aerodrome. As the Council does not appear to allocate this site as a strategic allocation in the CS then it would appear to be a matter for the Site Allocations DPD.

3 **Conclusion**

3.1 In accordance with the wishes of the Planning Inspector, the following brief concluding section is provided.

3.2 What Part of the CS is unsound?

The housing requirements to 2026 should comprise 200 per year.

Carpenders Park should be identified as a Key Centre.

3.3 Which soundness criterion it fails?

The submitted CS is not justified. This is because the CS is not founded on a robust and credible evidence base regarding the assessment of Carpenders Park and its identification as a Secondary Centre is not the most appropriate strategy where the reasonable alternative is identification as a Key Centre.

3.4 Why it fails (by reference to the key parts of Bidwells' original representations)

In response to the CS Proposed Submission, Bidwells identified the non-conformity of the proposed reduced housing requirements.

In response to the CS Publication Stage, Bidwells identified the CS as not being justified due (in part) to identification of Carpenders Park as a Secondary Centre and not as a Key Centre.

3.5 How the CS can be made sound.

The CS can be made sound by reinstating the housing requirements to 2026 to 200 per year, by considering Carpenders Park as a Key Centre.

3.6 The precise change and/or wording being sought.

The precise changes are identified under 3.5 above and this will entail changes to various parts of the CS including the spatial strategy, settlement hierarchy and place shaping policies. It is considered these changes are within the scope of the examination process and hence will not require an unsound finding on the CS.

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