

## Three Rivers Site Allocations DPD Examination

# Summary of Site Specific Comments

Between

**Mr S Lyne and Three Rivers District Council**

The purpose of this statement is to identify the sites within the Site Allocations Local Development Document (SALDD) which remain in disagreement between the objector and the District Council in relation to Issue 6.

We identify the sites within the SALDD under the following headings:

### **1. Sites which are not the subject of objection**

- H(4) Mansion House Farm Equestrian Centre, Bedmon Road, Abbots Langley;
- H(5) Pin Wei, 35 High Street, Abbots Langley;
- H(7) Furtherfield Depot, Abbots Langley;
- H(8) Leavesden Aerodrome, Abbots Langley;
- H(10) Langlebury House/School, Langlebury;
- H(12) 33 Baldwins Lane, Croxley Green;
- H(14) 50-52 New Road, Croxley Green;
- H(15) Former Yorle Road School, Yorke Road, Croxley Green;
- H(16) Croxley Station Car Park and Timber Yard;
- H(18) Land rear of Queens Drive, Mile End;
- H(19) Garages Rear of Drillyard, west Way, Rickmansworth;
- H(20) Long Island Exchange, Victoria Close, Rickmansworth;
- H(21) Police Station, Rectory Road, Rickmansworth;
- H(22) Royal British Legion, Ebury Road, Rickmansworth;
- H(23) Langwood House, High Street, Rickmansworth;
- H(24) Gas Works, Salters Close, Rickmansworth;
- H(25) Bridge Motors, Church Street, Rickmansworth;
- H(26) Depot, Harefield Road, Rickmansworth;
- H(31) Crescent Club, Hallows Crescent, South Oxhey;
- H(32) Former Jet PH, Hayling Road, South Oxhey;
- H(33) Little Furze School, South Oxhey;
- H(34) Amenity Space Maylands Road/Ferndown Road, South Oxhey;
- H(37) Grazing land at Foxgrove Path/Heysham Drive, South Oxhey

**2. Sites which are NOT considered to conform with the Core Strategy Spatial Strategy, Policy CP2 and are NOT likely to be deliverable<sup>1</sup> or developable<sup>2</sup> in accordance with the “Framework” under the following categories:**

**(a) Sites which are not in a suitable location and do not accord with the Core Strategy and Framework:**

| <b>Site Ref:</b>  | <b>Summary reason why not suitable</b>   | <b>No. of Dwellings Removed</b> |
|---|--|---------------------------------|
| H(1) Adj 65 Toms Lane, Kings Langley                          | <ul style="list-style-type: none"> <li>• Contrary to CS Spatial Strategy; not accord with settlement hierarchy;</li> <li>• Contrary to CS Policy CP2 – not sustainable edge of settlement location;</li> <li>• Unbounded GB; no defensible boundary or natural feature – fails para 85 of the Framework;</li> <li>• Bedmond village to remain in GB due to important contribution the open character of the village makes to openness of the GB pursuant to para 86 of the Framework;</li> </ul> | <b>-10</b>                      |
| H(2) Land at Three Acres, Toms Lane, Kings Langley            | <ul style="list-style-type: none"> <li>• Same as H(1)</li> </ul>   | <b>-20</b>                      |
| H(6) Leavesden Pumping Station, East Lane, Abbots Langley     | <ul style="list-style-type: none"> <li>• Same as H(1)</li> </ul>   | <b>-15</b>                      |
| H(9) Hill Farm Industrial Estate, Hill Farm Avenue, Leavesden | <ul style="list-style-type: none"> <li>• The site appears to be in active employment uses and let. The proposal will lead to loss of employment uses and land.</li> </ul>  | <b>-30</b>                      |
| H(13) Killingdown Farm Buildings, Crixley Green               | <ul style="list-style-type: none"> <li>• Same as H(1);</li> <li>• Unwelcome protrusion into GB contrary to para 85 of the Framework;</li> <li>• No pedestrian access on Little Green Lane and therefore reliant on motor vehicle as no public transport</li> </ul>   | <b>-30</b>                      |
| H(17) Branksome Lodge, Loudwater Lane,                        | <ul style="list-style-type: none"> <li>• Same as H(1);</li> <li>• Contrary to CS spatial strategy; not accord with settlement hierarchy in other village;</li> <li>• Not located in sustainable location.</li> </ul>   | <b>-10</b>                      |

<sup>1</sup> To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans

<sup>2</sup> To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

|   |   |                                   |
|---|---|-----------------------------------|
| H(28) Land South of Tolpits Lane          | <ul style="list-style-type: none"> <li>• Same as H(1);</li> <li>• Contrary to CS spatial strategy; not accord with settlement hierarchy in other location;</li> <li>• Inappropriate location for housing. Isolated location.</li> <li>• Non sustainable location.</li> <li>• Reliant on car as no public transport links or footpaths.</li> </ul> | <b>-50</b>                        |
| H(29) Pocklington House, Eastbury         | <ul style="list-style-type: none"> <li>• Not available currently in use as a care home.</li> <li>• SHMA identifies need to accommodate care provision in the District and therefore will require suitable alternative provision.</li> </ul>   | <b>-30</b>                        |
| H(30) The Fairway, Green Lane, Oxhey Hall | <ul style="list-style-type: none"> <li>• Same as H(29)</li> </ul>   | <b>-30</b>                        |
|   |   | <b>-225 dwellings from supply</b> |

**(b) Sites which have over-estimated capacity contrary to the Core Strategy and Framework:**

| <b>Site Ref:</b>  | <b>Summary reason why over-estimated capacity</b>  | <b>Reduction of Dwelling Capacity</b> |
|---|--|---------------------------------------|
| H(27) Depot, Stockers Farm Road, Rickmansworth            | <ul style="list-style-type: none"> <li>• Density too high based on character of area and site constraints – less units deliverable.</li> <li>• Suggest 20-30dph more compatible with character of area.</li> </ul>                         | <b>-30</b>                            |
| H(36) Grapevine Public House, Prestwick Road, South Oxhey | <ul style="list-style-type: none"> <li>• Pub in use. Loss of community facility.</li> <li>• Includes part woodland.</li> <li>• Overestimated capacity density 56dph contrary to CS policy.</li> <li>• Locality is around 30 dph</li> </ul> | <b>-12</b>                            |
| H(38) Rear of Lytham Avenue, South Oxhey                  | <ul style="list-style-type: none"> <li>• Overhead cables may need relocating or preclude optimising site capacity, suggest reduction of site capacity to address this.</li> <li>• Electricity substation to south.</li> </ul>              | <b>-10</b>                            |
|   |  | <b>-52 dwellings from supply</b>      |

**Total shortfall of 277 dwellings to meet TRDC's CS Housing Target.**

**(c) Sites with uncertainty over deliverability in the Plan period causing concern with the Council’s “just enough” allocation approach:**

| Site Ref:                          | Summary reason why not suitable  |   |
|------------------------------------|--|---|
| H(3) Kings Langley Employment Area | <ul style="list-style-type: none"> <li>• The site is a mixed use allocation. The Council is seeking to gain employment commercial use from the sites identified. This adds to the uncertainty of the delivery of the quantum of housing envisaged;</li> <li>• The South West Herts Employment Land Update June 2010 (EB04) – para 2.2 identifies 4ha of land will be released for mixed use development as the remainder has an important role in the economy;</li> <li>• The Council has identified 4 ha of land to be released for mixed use development achieving 150 residential dwellings and commercial uses at 37 dph;</li> <li>• This is an over estimate of capacity. Higher density of development will be required;</li> <li>• These conflicts may result in delay of development that may not be achieved in the plan period.</li> </ul> | <b>-150?</b>  |
| H(35) South Oxhey Town Centre      | <ul style="list-style-type: none"> <li>• See full submission to issue 7</li> <li>• Availability concerns in the Plan period.</li> <li>• Development partner pulled out of scheme;</li> <li>• The Council needs to acquire land/CPO – delay;</li> <li>• displace existing users will require phasing;</li> <li>• multiple land ownerships/interests</li> <li>• Density – 222dph too much – all flatted. No mix of accommodation types;</li> <li>• No evidence of viable development number.</li> </ul>  | <b>-280?</b>  |
|                                    |  | <b>Potential for non-delivery of all 430 dwellings delivered in plan period</b> |

**Potential for non-delivery of all 430 dwellings delivered in plan period**

**Conclusion**

Our assessment has identified a minimum total shortfall of 277 dwellings to meet TRDC’s CS Housing Target within the SALDD. However, there is significant potential for a shortfall within a further 430 dwellings planned for delivery in the SALDD.

