

Consultation Responses on Site Allocations Additional Sites (July 2012)

31 responses, and copy of a petition with 423 signatures and 5 letters objecting to development of land at Hill Farm Avenue green space.

Proposed Additional Housing Site Allocation

Site AH(1): Land Opposite Alpine Press, Kings Langley

Yes: 64% (7 responses)

No: 36% (4 responses)

Reference	Comment
03193	<p>The consultation document identifies one potential housing site in Kings Langley, referred to as 'Land opposite Alpine Press, Kings Langley'. This land is owned by my client and we formally confirm that we support the proposed designation. We consider the site to be entirely suitable for housing.</p> <p>Site has a long established use as a car park, in connection with the Alpine Press works on the opposite side of Station Road and is previously developed land. The car park is relatively large, accommodating about 20 vehicles and is covered in hard standing. NPPF emphasises the importance of development of brownfield sites in sustainable locations such as this.</p> <p>Paragraph 17 states "Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking". One of these core principles is to "encourage the effective use of land by reusing land that has been previously developed (brownfield land)".</p> <p>Paragraph 111 states that "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land".</p> <p>Previously developed land such as this should be developed before green field sites, in the interest of securing sustainable development, which is a key component of the NPPF.</p> <p>The site is in a very accessible location directly opposite Kings Langley Station and on local bus routes, with a bus stop right outside.</p> <p>Site is much closer to Kings Langley Station than existing development in the local area. To help achieve a sustainable pattern of development, accessible sites such as this, should be developed before more remote sites.</p> <p>Development of the site for housing would comply with existing planning guidance, which emphasises importance of delivering more sustainable patterns of development and reducing the need to travel, especially by car.</p> <p>A core principle of the NPPF is to "actively manage patterns of growth to</p>

	<p>make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable". The allocation of the site for housing would comply with this objective.</p> <p>There are many groups of people who do not drive, including people with disabilities, who are reliant on rail services to access jobs in major settlements. There are no closer development sites to Kings Langley Station, so in terms of transport accessibility the site scores very highly.</p> <p>The site is within the existing built up area and not in open countryside.</p> <p>Proposed use of the site for housing would be compatible with the established character of the area. The area contains many existing dwellings and a residential use is acceptable in planning terms.</p> <p>It is considered that the far western part of the site next to the river could be appropriately landscaped and would offer an opportunity to improve the biodiversity of the river. Such an approach would comply with paragraph 7 of the NPPF, which refers to need to protect and enhance the natural environment, where appropriate, including helping to improve biodiversity.</p> <p>The consultation indicates that the site has a potential capacity for 5 units. We consider that the site is suitable for flats and could accommodate a higher level of development. We believe that the site is capable of providing approximately 8 units and request that the capacity is amended. It is important that efficient use is made of the site.</p> <p>In conclusion, the allocation of this site represents an important opportunity to provide much needed new housing, in an accessible and sustainable location. We support the proposed allocation.</p>
03673 (Herts Constabulary)	<p>The land appears to be Alpine Press car park and as such removal of this car park will put additional stress on the parking in the area. There is already some building work within this area and many cars are parked outside the Three Rivers area within Dacorum Borough Council creating problems for this Council. If this land is utilised for housing have Alpine any other area where they could have either staff or visitor parking.</p>
04304	<p>This land is not used by the public for anything, its just a derelict piece of land. This would be ideal space for homes in keeping with other properties. Main station near by ideal.</p>
NSI/0063	<p>(Re-submission of objections to Site Allocations Preferred Options Consultation)</p> <p>Do not support policy change. DPD is not sound as it is not justified or effective.</p> <p>Fairways Farm site previously part of joint proposal with Penfold Golf Course but rejected by Members and local residents following concerns over scale of growth, access from A405 and loss of Green Belt. Therefore current proposals for more modest development of 70-100 new dwellings on Fairways Farm which are of lower scale than previous proposals, more in keeping with the character of the existing area and minimise development of Green Belt land.</p> <p>Highways assessment has shown access from Bucknalls Lane acceptable</p>

	<p>to Highway Authority as junction is appropriate and highway network can accommodate development. Good public transport service close to site.</p> <p>Evidence base and SA have not reassessed latest proposals so does not take into account most up to date position on Fairways Farm. Have re-appraised amended site which scores 931. Site is contained within triangular area, and Appeal Ref: W/723/66 noted land serves no practical purpose as part of Green Belt.</p> <p>NPPF requires defensible Green Belt boundaries which should not include land where it is unnecessary to keep permanently open. Site would have defensible boundaries and well positioned for rail, bus, roads and amenities in Garston.</p> <p>Site would be more appropriate for development than majority of sites identified in Site Allocations document.</p> <p>Site Allocations not founded on robust or credible evidence base as not based on up to date accurate assessment. Site scores better than currently allocated sites and other material planning reasons for inclusion so strategy would not be most appropriate when considered against reasonable alternatives.</p> <p>Have carried out an assessment of whether proposed allocations are developable (against PPS3 paragraphs 54-46) and determined a number of sites not developable in plan period as a result of site constraints, overestimated supply and serious constraints on South Oxhey delivery. Therefore shortfall of 264 dwellings in Council's housing land supply, and must plan for additional allocations to make up shortfall since DPD is not effective as should be deliverable and flexible.</p> <p>East of England Plan still in place and Core Strategy sets minimum targets to be delivered, not ceilings. Therefore sound strategy to ensure flexible supply of sites to exceed delivery of minimum targets.</p>
<p>NSO/0077 (CPRE Hertfordshire)</p>	<p>CPRE Hertfordshire considers that the narrow area of Green Belt separating Kings Langley from Abbots Langley within which this site is located is of particular importance, which would be threatened by the allocation of the site for Housing.</p> <p>The comment in the table in paragraph 2.2 of the consultation document is also misleading, by claiming that the site is not on the edge of the Green Belt. The well over 100-metre long site is only separated from the existing Green Belt boundary by a very narrow (estimated at around 12 metres in width) strip of land, which would perform no meaningful Green Belt purpose if the proposed site allocation took place.</p> <p>The result of housing development at this site would be the consolidation of ribbon development in this important section of Green Belt separating the two settlements that is little over 200 metres in width.</p> <p>Finally, no justification has been set out for the allocation of this site for Housing, contrary to the policy requirement for protection of the Green Belt from inappropriate development set out in the National Planning Policy Framework, or demonstration of exceptional circumstances that would justify removal of the site from the Green Belt, which would be the practical</p>

	effect of its allocation.
SCO/0006 (Hertfordshire County Council)	Highways This site is very near Kings Langley station and therefore highly accessible by train. Station Road is well served by buses and has a cycle route along it. Historic Environment The proposed housing allocation is small in scale and does not have any constraints in relation to the Historic Environment.
SCO/0008 (Dacorum Borough Council)	We support this proposed small scale use of previously developed land in the Green Belt for housing. However, we would ask that you continue to take into account the cumulative impact of such development on the infrastructure of the village.
SCO/0018 (Abbots Langley PC)	Object. It is in the Green Belt
SCO/0023 (Environment Agency)	There is an opportunity to enhance the stretch of river in this locality between the industrial site and the motorway viaduct. It has been identified in the Dacorum Chalk River Restoration Strategy as a stretch that would benefit from in-channel habitat enhancement and marginal shelf creation. We would expect any residential development at the site to comply with the requirements of the Thames River Basin Management Plan to improve the ecological potential of the river to good – it presently has bad ecological potential. Any development should consider the quality of water that is being discharged into the river, surface water management and there should be an adequate buffer zone adjacent to the river at the site.
SCO/0057 (Natural England)	We note that the site is close to the following wildlife site: Grand Union Canal/River Gade. Consideration should be given in any development brief as to how the allocation can maintain and or enhance this wildlife site. We also note that the site is bordered by a public right of way. This should be regarded as an element of green infrastructure. Negative impacts on the public right of way should be considered when considering the merits of this allocation. Opportunities to enhance the attractiveness of the public right of way to users should be considered in any development brief.

Proposed Additional Open Space Allocations

Site AOS(a): South Way Playing Fields

Yes: 66% (4 responses)

No: 34% (2 responses)

Reference	Comment
04304	Lovely open space for children to play.
SCO/0055 (St Stephen PC)	The Council is to be commended for the designation of open spaces
SCO/0057 (Natural England)	In general terms Natural England welcomes the new designation of areas of publicly accessible open space. However, such sites may be subject to greater recreational pressure than at present, which in turn may have a detrimental wildlife impact. Our site specific comments are as follows: We note that the site appears to include the following wildlife site: The Bothy Chalk Mine, Abbots Langley. Proposals to allocate this site as

	Public Open Space should consider how the proposals may affect this wildlife site.
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Site AOS(b): The Green, Croxley Green

Yes: 60% (3 responses)

No: 40% (2 responses)

Reference	Comment
SCO/0055 (St Stephen PC)	The Council is to be commended for the designation of open spaces
	In general terms Natural England welcomes the new designation of areas of publicly accessible open space. However, such sites may be subject to greater recreational pressure than at present, which in turn may have a detrimental wildlife impact. Our site specific comments are as follows:
SCO/0057 (Natural England)	We note that the site appears to include the following wildlife site: Croxley Green. Proposals to allocate this site as Public Open Space should consider how the proposals may affect this wildlife site.

Site AOS(c): Harrocks Wood, Chandlers Cross

Yes: 80% (4 responses)

No: 20% (1 responses)

Reference	Comment
SCO/0055 (St Stephen PC)	The Council is to be commended for the designation of open spaces
	In general terms Natural England welcomes the new designation of areas of publicly accessible open space. However, such sites may be subject to greater recreational pressure than at present, which in turn may have a detrimental wildlife impact. Our site specific comments are as follows:
SCO/0057 (Natural England)	We note that the site appears to include the following wildlife site: Harrock's Wood. Proposals to allocate this site as Public Open Space should consider how the proposals may affect this wildlife site. In addition to this, the allocation is adjacent to Whippendell Wood SSSI. There is no information within the consultation documents describing what the effect of this site might be. Before this allocation is submitted, the council should demonstrate that the proposed allocation will not have a detrimental impact on the features of this SSSI. In the absence of such demonstration we advise that this allocation may be unsound.

Site AOS(d): Hill Farm Avenue, Chandlers Cross

Yes: 71% (10 responses and copies of 423 signature petition and 5 letters opposing to previous proposals for development of the site)

No: 29% (4 responses)

Reference	Comment
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00658 (Thrive Homes)	<p>We fail to see the landscape justification for the proposal to safeguard this site. It is part of a predominantly built-up area, and has the potential to contribute to housing land supply without adverse impact on the overall landscape structure of the area. Any development could accommodate areas of incidental open space for recreation.</p>
02123 (Watford Community Housing Trust)	<p>We do not support the proposed allocation for open space for the following reasons;</p> <ol style="list-style-type: none"> 1. The site definition is impractical, as it forms part of a larger site within the ownership of Watford Community Housing Trust and outwith TRDC's boundary. Its designation would also leave existing privately owned garages landlocked and would not reflect the adjacent local authority designation. 2. Watford Community Housing Trust proposes to develop the larger site, combining affordable housing and play provision. This would have 50% of the site footprint used for housing and 50% as improved publicly accessible recreational space. 3. The Trust proposal under point 2 meets the following TRDC Core Strategy Objectives; <ol style="list-style-type: none"> a) To provide growth required to support local communities and provide for their needs in the most sustainable way possible b) To locate growth in the most sustainable locations in terms of access to services and transport networks and impact on the environment c) To improve access to housing and affordable housing for communities across the whole District h) To recognise opportunities to make the best use of land whilst minimising adverse impacts on the character of the District and minimising harmful changes to the built, historic and natural environment i) To recognise opportunities to improve and enhance the built, historic and natural environment wherever possible 4. The Trust proposal under point 2 also meets the following sustainability objectives; <ol style="list-style-type: none"> 8. Maximise the use of previously developed land and buildings, and the efficient use of land 9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible 11. To conserve and enhance landscape and townscape character and encourage local distinctiveness 12. To encourage healthier lifestyles and reduce adverse health impacts of new developments 13. To deliver more sustainable patterns of location of development

	<p>15. Ensure that everyone has access to good quality housing that meets their needs</p> <p>19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region</p> <p>5. The directly adjacent green belt (Site AGB (1)), and close proximity of Leavesden Country Park adequately provide for local green space.</p> <p>Designation of Site AOS(d) Hill Farm Avenue, Leavesden will prevent alternative development which has stronger compliance with planning policy, specifically in helping to deliver the aims and objectives of the Core Strategy and Strategic Objectives for the District.</p>
04294	<p>I would like to reiterate that this land must be kept as open space/local green space or village green status in order that the local children can use it as they have for the past twenty six years since I have been a resident here.</p> <p>Of late, since the schools have broken up for the holidays and now the Olympics is upon us it has been a hive of activity with more local children using it for playing football and games, and at this present moment in time from my window I can see a family of two adults and a two children having a picnic by the right hand seat, another family of three adults and two children are having a picnic on the grass, and one adult and one adult are in the recreation area. As I speak two of the children who were having a picnic have now entered the recreation area. I have also seen three dog walkers this morning.</p> <p>It is obvious that this open space must stay as it is. It is never abused and is used in a proper way, therefore, there is nothing untoward for it to be changed. It is respected by everyone who uses it.</p> <p>For houses and flats to be planted on this beautiful piece of grassland and recreation area would be a dismissal of the type of space that it is. There is nothing else around here for the children, and to have extra children would create an unacceptable situation for all the children presently living here and those new to the area. Where would they play? There would also be a chance of a fatality, visualise the park being smaller and the swing park being smaller and near the road, with the new residents transport having to use the single track road of Hill Farm Close as their only means of getting to their abodes. Fatality is obvious. Children running everywhere - across the road.</p> <p>IT MUST BE KEPT AS GREEN SPACE !</p> <p>The open space at this site has a requirement by adults and children on this and surrounding estates to stay as green space with the park staying exactly the same. There is no need for change here as it is used in a positive way via sports, recreation, relaxation by everyone living here. The support for this space to be left alone is uppermost by nurseries, school children and community centres.</p>

	<p>I am also acting as a representative for the Save Hill Farm Close Park Leavesden Committee. We have been fighting any proposed development of the site by Watford Community Housing Trust and I am attaching scanned copies of our ongoing petition. We also have a Facebook Group - Save Hill Farm Close Park Leavesden from development which also has many comments from local residents. This is an open group that can be viewed by anyone but I would be happy to copy these comments if you wish.</p> <p>We have expressed that we would like to keep the site as open green space as it has been used by the community for recreation for 60+ years. We are also in the process of applying for Village Green Status and are hoping that Watford Community Housing Trust are willing to work with us on an improved green space.</p> <p>With regards to keeping the space at Hill Farm Avenue/Hill Farm Close a green space, we have had unbelievable support. The space is used by the entire community, from the very young to the very old. To give us even greater protection for the future we will be applying to Hertfordshire County Council for village green status and will hopefully re-instate a village green in Leavesden.</p>
04295	[Copies of petition and letters sent]
04297	Open spaces in Leavesden are fast disappearing with other developments. We must keep this one, especially for the children.
04298	I play football and other sports over there with my family and friends. It would be preposterous to build on it as it is a space many people use for such activities, dog walking etc.
04301	My children played there as do my grandchildren. We have been here 38 years. Saturday I saw a group of youngsters there. There is nowhere left where they can play safely and play ball games apart from Hill Farm.
04304	All the community use this space. Kids play, families have picnics, people walk dogs, older people walk around the field for exercise and it is a real safe place for everyone. This is the only green we have in Leavesden.
NSI/0029	Full support for the Leavesden councillors for the inclusion of this area as open space and local green space within in the LDF.
SCO/0014 (Watford Borough Council)	<p>The majority of the site is in TRDC. For the part of the site that is in WBC (mostly play area), development proposals would be considered against Policy L4 which states that "other than in exceptional circumstances, permission will not be given for a change of use from private or public open space to any other use.</p> <p>The open space therefore is important and should be protected.</p>
SCO/0055 (St Stephen PC)	The Council is to be commended for the designation of open spaces
SCO/0057 (Natural England)	In general terms Natural England welcomes the new designation of areas of publicly accessible open space. However, such sites may be subject to greater recreational pressure than at present, which in turn may have a detrimental wildlife impact.

Green Belt

Site AGB(1): Leavesden

Yes: 33% (3 responses)

No: 67% (6 responses)

Reference	Comment
00770	Please gain a good result to proposed Green Belt boundary change if this will remove 400+ of new houses built.
02127 (Warner Bros)	<p>In summary, WBSL's comments are as follows:</p> <p>(a) WBSL welcomes the Council's further review of green belt boundaries at Leavesden and support the removal of the Studios from the green belt;</p> <p>(b) However, the Council's proposed amendment to the green belt boundary at AGB (1) does not go far enough. WBSL therefore maintains its objection to the proposed revision, as it continues to fail to accord with the recently adopted core strategy, particularly policies PSP2 and CP11, in that it fails to make the necessary revisions to the green belt boundary in order to ensure that the future development needs of this nationally important employment site are not compromised. The result of the Council's proposed amendment is that the draft policy is not considered to be sound and is not justified, as it fails to remove all of the developed area of the Studios and the Island Site (future expansion land) from the green belt.</p> <p>Proposed policy amendments</p> <p>The Site Allocations DPD should be amended to reflect the continuing importance of the Studios to the national and regional economy, both as a local employer and as a centre intended to contribute to the economic growth of the District for the plan period, as set out in core strategy policies PSP2, CP11 and paragraph 5.106. In order to satisfactorily do this, the green belt should be revised as shown on the enclosed (previously submitted) plans. We also enclose a plan showing the Council's proposed amended green belt boundary superimposed on a site layout plan, which clearly highlights anomalies with the Council's approach. An aerial photograph dated July 2012 supports this position.</p> <p>Comment</p> <ol style="list-style-type: none"> 1. The revised policy remains unreasonably onerous, at odds with the realities of the position 'on the ground' and contrary to Policy PSP2(d) of the core strategy (2011). 2. WBSL has provided robust evidence to demonstrate the important and significant contribution that WBSL makes to the local, regional and national economy and the ability of WBSL to attract other key supply-chain businesses to the local area. 3. Whilst we are pleased that the Council has recognised the role of the Studios through the review of the green belt designation, by drawing the boundary so tightly around the Studios it does not allow future development needs to be accommodated or give Warner Bros. the confidence and certainty that they require to continue to plan, operate, manage and continue to invest in and expand the Studios in the future. As we have noted previously it is of vital importance that Warner Bros. is given the appropriate level of flexibility and certainty to do this. 4. It is also important that future expansion opportunities, provided by the Island Site are not similarly constrained by the green belt designation, such that it may meet the changing needs of WBSL and the film and television industry to which WBSL must respond. The Island Site is required by WBSL as a future expansion site for the Studios to accommodate film,

media and other associated studio related uses - see previous representation. By retaining the Island Site within the green belt this would have the direct effect of creating a barrier to further investment, particularly from those key supply-chain businesses that would otherwise gravitate towards this core industry facility.

5. The retention of the green belt designation in this location and as proposed by the Council, would impose considerable restraint involving a high degree of uncertainty, inflexibility and delay to any such development proposal and impose an unacceptable level of restraint on Warner Bros. business operations such that it may lead to an inability to fulfil its potential. A fetter of such a scale on an economic asset of such importance should only be imposed or retained where it can be fully justified.

6. By any objective measure, neither the Studios (in its entirety excluding the Backlot), nor the Island Site contribute to the purposes or objectives of green belt land and, as such, should be removed from the green belt, as the designation no longer serves any useful purpose. We note that the exceptional circumstances to justify the revision to the green belt boundary have already been accepted by the Council. It is inconsistent for the Council to continue to take a partial approach to green belt review on this important strategic site. The council's approach is therefore considered to be unsound and not in accordance with the National Planning Policy Framework (NPPF).

7. Under the heading Reason for Change under site AGB (1) the Council state:

"Current green belt boundary includes area already developed which does not contribute to Green Belt objectives. Proposed boundary removes existing development at Huntonbury Village, Leavesden park, Hill Farm Avenue and Leavesden Studios from the Green Belt. On the Leavesden Studio site, only the studio buildings and immediately surrounding areas of hardstanding are proposed to be removed from the Green Belt. Retaining Green Belt designation on the rest of the Studios Site provides control over future development of this significant site."

8. Green belt boundaries are required to be defensible and endure. The revised boundary proposed by the Council meets neither of these tests and is not sound.

9. The revised boundary has been drawn too tightly around the Studios, incorrectly identifying the extent of hardstanding, which is more significant than indicated on the Council's plan, see enclosed aerial plan. The revision of these boundaries as shown on the enclosed plans will ensure that the WBSL is able to continue to make its vital contribution to the economy of the District for the plan period. The new boundaries, in accordance with the NPPF, will provide a green belt boundary that will endure, with Aerodrome Way providing a robust boundary edge. The new boundaries will not have any adverse impact upon the integrity of the green belt nor its ability to fulfil its defined purposes

10. The only reason given within the pre-submission (Additional Sites) DPD for the failure to release all of the Studios site (excluding the Backlot) and the Island Site relates to the Council's desire to control the future development of the site. Given that planning permission for the Studios

	<p>was granted as an exception to established green belt policy by reference to the very special circumstances test, and that neither the Island Site nor the Studios site meets the purposes or objectives of green belt land, it is difficult to understand the logic that underpins this conclusion. In addition, the Council has the full range of statutory planning controls at its disposal to effectively and reasonably control future development of the site.</p> <p>PLEASE ALSO SEE ATTACHED LETTER, PLAN & AERIAL PHOTOGRAPH.</p>
03673 (Herts Constabulary)	<p>I have a number of concerns over the proposal to change some of the land to Green Belt, principally as the Council has already agreed to building of some 425 houses on Leavesden Park; planning references 10/2230/OUT, 12/1213/AOD and 12/1214/AOD refer.</p> <p>The Council have also agreed a number of applications for building on the Leavesden Studio site, principally the Harry Potter experience plus all the hard standing parking and various other parts of the new studio and if this is to be removed from the Green Belt then the new Leavesden Park housing estate must also be excluded from the Green Belt.</p> <p>I would prefer to see the studio remain as green belt land so as to limit future expansion within this significant site.</p>
04298	I would like it extended to Hill Farm Avenue and Hill Farm Close to afford us greater protection.
04301	We do not need to lose any more Green Belt land.
NSO/0077 (CPRE Hertfordshire)	<p>CPRE Hertfordshire objects to the removal from the Green Belt of the 250-metre wide belt of open land separating the existing Leavesden Studio buildings at the former Leavesden Airfield from the existing residential area to the east. Retention of this land within the Green Belt is particularly important because planning permission has been granted for residential development of a large area of the former airfield to the north of this belt of land (site allocation H(10) which CPRE Hertfordshire considers should be removed from the Green Belt as a result - our representation dated March 2012) and as a result the remaining area of Green Belt separating the Studios from North Watford will be under threat.</p> <p>Accordingly this 250-metre wide open area should be retained within the Green Belt.</p>
SCO/0006 (Hertfordshire County Council)	No comment. Area proposed to be removed from green belt appears to match areas already developed by Warner Bros (at studio) and MEPC (to east of Aerodrome Way).
SCO/0014 (Watford Borough Council)	<p>The proposed changes to the Green Belt boundary around Huntonbury village and Hill Farm Avenue follow a logical boundary. As this is a built up residential area and naturally divided by the road it is accepted that this should be removed from the Green Belt.</p> <p>However, WBC object to the removal of the Leavesden Studio site. By removing this area from the Green Belt designation it weakens the GB corridor that separates Watford from Abbots Langley. Retaining the site in the designation and treating it as a Major Developed Site in the GB would be a preferred option.</p>
SCO/0055 (St Stephen PC)	Proposed changes to the Green Belt boundary seem sensible, given the level of development within.

SCO/0057 (Natural England)	Natural England has no comment to make with respect to this proposal.
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Other Comments

Reference	Comments
03191; NSO/0054 (Canal and Rivers Trust); NSO/0078 (Chilterns Conservation Board); SCO/0007 (Chiltern District Council); SCO/0010 (Hertsmere Borough Council); SCO/0011 (LB Hillingdon); SCO/0026 (English Heritage); SCO/0058 (Highways Agency)	No Comments.
02153 (Maplecross Properties Ltd)	<p>We refer to our previous letters of 13 January 2011 and 1 March 2012, being our client's representations in response to the Site Allocations Pre-Submission Consultation with regard to the land at 'Mill End/Maple Cross - Froghall Farm and adjoining land Site S(b)', hereafter referred to as 'land at Maple Cross'.</p> <p>We note that our proposals have not been included in the list of new sites under the above consultation. In light of the representations that have been made on behalf of our client we object to this omission.</p> <p>We suggest that the most appropriate way forward for resolving the future of the land at Maple Cross is to incorporate a provision like policy GB4 from the Local Plan into the SA DPD to cover the land at Maple Cross. For example, adapting the wording of GB4 it would read as follows;</p> <p><i>The Council is committed to the preparation of a comprehensive Development Brief for land at Maple Cross which will be subject to full consultation with the public and relevant organisations. It is considered that development of the site may be acceptable to enable environmental, landscape, transport and other benefits to be provided. The area will remain in the Green Belt until formal amendment of the Site Allocations DPD arising from adoption of the Development Brief.</i></p> <p>The use of a Development Brief to resolve the future of complex sites has recently been used by the Council at Langleybury/The Grove.</p>

(Re-submission of objections to Site Allocations Preferred Options Consultation)

Do not support policy change. DPD is not sound as it is not justified or effective.

Fairways Farm site previously part of joint proposal with Penfold Golf Course but rejected by Members and local residents following concerns over scale of growth, access from A405 and loss of Green Belt. Therefore current proposals for more modest development of 70-100 new dwellings on Fairways Farm which are of lower scale than previous proposals, more in keeping with the character of the existing area and minimise development of Green Belt land.

Highways assessment has shown access from Bucknalls Lane acceptable to Highway Authority as junction is appropriate and highway network can accommodate development. Good public transport service close to site.

Evidence base and SA have not reassessed latest proposals so does not take into account most up to date position on Fairways Farm. Have re-appraised amended site which scores 931. Site is contained within triangular area, and Appeal Ref: W/723/66 noted land serves no practical purpose as part of Green Belt.

NPPF requires defensible Green Belt boundaries which should not include land where it is unnecessary to keep permanently open. Site would have defensible boundaries and well positioned for rail, bus, roads and amenities in Garston.

Site would be more appropriate for development than majority of sites identified in Site Allocations document.

Site Allocations not founded on robust or credible evidence base as not based on up to date accurate assessment. Site scores better than currently allocated sites and other material planning reasons for inclusion so strategy would not be most appropriate when considered against reasonable alternatives.

Have carried out an assessment of whether proposed allocations are developable (against PPS3 paragraphs 54-46) and determined a number of sites not developable in plan period as a result of site constraints, overestimated supply and serious constraints on South Oxhey delivery. Therefore shortfall of 264 dwellings in Council's housing land supply, and must plan for additional allocations to make up shortfall since DPD is not effective as should be deliverable and flexible.

East of England Plan still in place and Core Strategy sets minimum targets to be delivered, not ceilings. Therefore sound strategy to ensure flexible supply of sites to exceed delivery of minimum targets.

NSI/0063