

## Three Rivers District Council Core Strategy

### Statement in Response to Matter 1: Overall Spatial Strategy (Spatial Strategy/Settlement Hierarchy)

#### 1.1 Clarification of the RS and the need for general conformity

- 1.1.1 Regional Strategies are currently part of the development plan. On 27 May 2010, the Government set out their commitment to abolish Regional Strategies and return decision making powers on housing and planning to local Councils. This was to be a material planning consideration.
- 1.1.2 On 6 July 2010, the Government announced the revocation of Regional Strategies with immediate effect, although the High Court held on 9 November 2010 that the decision to scrap Regional Strategies with immediate effect was unlawful.
- 1.1.3 The Government's intention to abolish Regional Strategies through the Localism Bill has been held by the High Court to be a material planning consideration on 7 February 2011. The Bill has made significant progress through Parliament.
- 1.1.4 The Localism Bill was presented to Parliament on 13 December 2010. On 17 January 2011 the House of Commons debated the main principles of the Bill. The Commons decided that the Bill should be given its Second Reading and sent in to a Public Bill Committee for scrutiny. The Localism Bill Committee took written evidence and heard oral evidence, before considering the Bill clause by clause. The Committee's consideration of the Bill finished on 10 March 2011. The Report Stage and Third Reading took place on 17 and 18 May 2011. The Bill had its first reading in the House of Lords on 19 May 2011 and the second reading is due to take place on the 7 June 2011.
- 1.1.5 The Council considers that as the Localism Bill progresses through Parliament, increased weight should be given to the intention to revoke Regional Strategies, and to pass powers of decision making on housing and planning to local Councils.
- 1.1.6 Local targets for housing and Gypsy and Traveller pitch provision are considered to be based on a sound, credible and up to date evidence base (see responses to questions 2.1 and 2.15). Additionally in the case of housing targets, the Core Strategy is not considered to be materially at variance with the Regional Plan.
- 1.1.7 Other changes made to the Core Strategy between Proposed Submission stage (June 2010) and Submission to remove reference to the East of England Plan are not considered raise issues of non-conformity, but instead ensure that the Core Strategy will remain relevant after adoption as the Government implement their commitment to abolish Regional Strategies.
- 1.1.8 It is noted that responses from the East of England Regional Assembly at previous stages of Core Strategy development and the response to the Preferred Options consultation in February 2009 stated that the Core Strategy was in general conformity with the East of England Plan, with the exception of policy for conservation of agricultural land and soils and a target for development on brownfield land. Following this response, a target for development on brownfield land is included in the submitted Core Strategy and policy for conservation of agricultural land and soils will be considered through the Development Management Policies DPD.

- 1.1.9 No responses from the Regional Assembly or Government Office were received at Proposed Submission or Changes to the Proposed Submission stages.
- 1.1.10 In addition, the East of England Plan was subject to a successful legal challenge as proposals for growth areas requiring significant additional housing in Hemel Hempstead, Welwyn Garden City and Hatfield by releasing land from the Green Belt were reached without a lawful SEA, which would have considered reasonable alternatives to the proposals and could have led to different allocations. The process to 'repair' the East of England Plan was halted following the announcement of the Government's commitment to the abolition of Regional Strategies.

## **1.2 Is the spatial strategy soundly based to address the key issues for the District?**

- 1.2.1 Yes.
- 1.2.2 Key issues for the District are summarised as priorities for the future in the Spatial Vision. They have been identified through the Spatial Portrait of Three Rivers (2010) [EB24] and Local Policy Context (2010) [EB23], by the Sustainable Community Strategy [SD11 and SD12] by sustainability appraisal [CD05] and by extensive public consultation on the Core Strategy [CD07 and CD08]. The identified key issues are therefore considered to be soundly based. The issues informed the development of the Spatial Vision and the Strategic Objectives which are intended to implement and deliver the Vision in order to address the identified issues.
- 1.2.3 To address the identified issues, the Spatial Vision states that 'in essence, future development must secure a balanced provision between homes and jobs that also safeguards and enhances the environment, maintains the Green Belt, secures good services and facilities for all and achieves a sustainable transport system'.
- 1.2.4 To achieve the Vision and address key issues for the District, the Spatial Strategy provides more specific direction for development in the District. The Spatial Strategy has been developed to strike a balance between restraining urban sprawl, enhancing the countryside and meeting development needs in a sustainable way.
- 1.2.5 The Spatial Strategy states that the emphasis for future development will be to continue to focus development within the existing urban area through development of previously developed land and appropriate infilling, recognising potential for mixed use development to contribute to the development of sustainable communities. This will be followed by development at the most sustainable locations on the edge of existing settlements.
- 1.2.6 The Spatial Strategy makes provision for development to be directed towards the Principal Town and Key Centres as the most sustainable settlements in the District (as determined by the settlement hierarchy informed by the Settlement Appraisal (2010) [EB12]), with more limited development in Secondary Centres which are considered less sustainable, and some limited development in Villages to meet local needs. The Spatial Strategy makes it clear that some Green Belt sites will be required to meet development needs, and that sufficient land will be identified to meet development requirements. It sets out the criteria-based approach that will be used to assess sites for development, taking into account the site's access to transport and services, impact on the environment and deliverability. The Strategy also requires development to make provision for necessary infrastructure.

1.2.7 The provisions of the Spatial Strategy are clearly related to the Spatial Vision and Strategic Objectives and therefore to the key issues for the District. Implementation of the Spatial Strategy would contribute to the achievement of the Vision and Objectives for the District and would therefore assist in addressing key issues that have been identified for the District.

### **1.3 Is the settlement hierarchy justified by robust evidence?**

1.3.1 Yes.

1.3.2 The settlement hierarchy is justified by evidence as set out in the Settlement Appraisal (2010) [EB12]. The Settlement Appraisal provides a thorough assessment of each settlement in the District according to access to a variety of services and infrastructure, and is considered robust. No representations at any stages of public consultation on the Core Strategy have raised concerns over the Settlement Appraisal itself.

#### **In particular:**

- **Is the designation of Leavesden/Garston and Mill End as Key Centres Justified?**

1.3.3 Yes.

1.3.4 National policy in PPS1, PPS3 and PPS4 require more sustainable patterns of development, reducing the need to travel by car and providing homes alongside jobs.

1.3.5 Leavesden and Garston and Mill End were identified as Key Centres following an update of the Settlement Appraisal (2010) [EB12] which shows that these centres have a comparable sustainability rating to the original Key Centres of South Oxhey, Croxley Green, Abbots Langley and Chorleywood.

1.3.6 It is acknowledged that Leavesden and Garston and Mill End have smaller populations than Abbots Langley, South Oxhey and Croxley Green, and that they may not contain a full range of services and facilities within the settlement. However, the Settlement Appraisal takes into account that where services and facilities in nearby settlements are within distance thresholds for accessibility, they will contribute to the sustainability of the settlement since they will be available to the communities.

1.3.7 The locations of Leavesden and Garston and Mill End means that their sustainability benefits from the presence of services and facilities in nearby settlements that are accessible from Leavesden and Garston and Mill End, in particular Watford and Abbots Langley in the case of Leavesden and Garston and Rickmansworth in the case of Mill End.

1.3.8 The excellent access to a range of services and transport infrastructure of Leavesden and Garston and Mill End mean that their overall sustainability is very good. This is demonstrated in the Settlement Appraisal.

1.3.9 Given the assessment of Leavesden and Garston and Mill End as very sustainable, they are therefore considered to be appropriate, sustainable locations for future development in accordance with national guidance. They are therefore appropriately designated as Key Centres (and thereby priority areas for future growth).

1.3.10 Identifying all of the most sustainable settlements as Key Centres offers the greatest flexibility for the identification of the most appropriate and sustainable sites for development through the Site Allocations DPD following a thorough assessment of each individual site.

1.3.11 It is noted that the representation raising this as an issue has now been withdrawn.

- **Does this undermine the strategic importance of the larger Key Centres? If so how?**

1.3.12 No.

1.3.13 As set out in the Core Strategy, recognising the size, function, accessibility and importance of the Principal Town and Key Centres, future major development should primarily be focused in and around these settlements.

1.3.14 Although South Oxhey, Abbots Langley and Croxley Green are larger settlements and have more provision of services and facilities within the settlement, Leavesden and Garston and Mill End still have excellent access to services, facilities and public transport. This makes them sustainable locations for future development that can contribute to achieving a more sustainable pattern of development that can reduce the need to travel by car and provide homes alongside jobs.

1.3.15 The Council does not consider that the larger Key Centres can or should automatically accommodate a greater level of development than smaller Key Centres. As set out in the Core Strategy Spatial Vision, the priorities for the future include 'to locate growth in the most sustainable locations in terms of access to services and transport networks and impact on the environment'. The identification of specific sites will be considered in detail through the Site Allocations DPD. However, the availability of sites, and their impact on the environment will also be relevant to whether a site is considered suitable for development, in addition to the sustainability of its location in terms of access to services and facilities rather than the size of the Key Centre in question. This will therefore affect the capacity of each Key Centre to accommodate development.

1.3.16 The designation of Leavesden and Garston and Mill End as Key Centres complements the larger Key Centres and ensures that the Core Strategy is directing most development to the most sustainable locations, whilst leaving detailed decisions on the most appropriate individual sites to the Site Allocations DPD. It does not undermine the strategic importance of the larger Key Centres.

1.3.17 It is noted that the representation raising this as an issue has now been withdrawn.

- **Is the designation at Croxley Green as a Key Centre justified?**

1.3.18 Yes.

1.3.19 Croxley Green is one of the largest settlements in Three Rivers with a population of 11,519 at the 2001 Census. As demonstrated by the Settlement Appraisal (2010) [EB12], Croxley Green has a good range of facilities within the settlement, and has good access to services through road links, bus services and a rail station. Given the size of Croxley Green in relation to the rest of the District and the high levels of provision of services and transport, the designation of Croxley Green as a Key Centre

reflects the evidence that Croxley Green is one of the most sustainable settlements in the District and is therefore justified.

- **Should Toms Lane be considered together with Kings Langley?**

1.3.20 No.

1.3.21 Although the western part of Toms Lane may relate to Kings Langley, the eastern part is more closely related to Bedmond (the break between the settlements shown on the Key Diagram is a result of the sports ground and open space adjacent to Bluebell Drive). In addition, the character of Toms Lane as a linear residential development within the Green Belt is not consistent with the character of Kings Langley. The Council considers that it would not be appropriate to include Toms Lane as part of Kings Langley.

1.3.22 The Settlement Appraisal (2010) [EB12] considered the sustainability of the Toms Lane settlement in the same way as all other settlements. As demonstrated at 3.35 of the Settlement Appraisal report, where services and facilities were in different settlements but were within the distance thresholds for accessibility for Toms Lane, they have been recorded as such and have contributed to the assessment of the sustainability of Toms Lane. However, given the limited access to services and facilities, the sustainability of Toms Lane has been assessed as 'poor'.

1.3.23 Given the limited access to services and facilities and the relatively poor sustainability of Toms Lane, it is not considered that it would be appropriate for the Spatial Strategy and Place Shaping Policies to direct development towards Toms Lane by identifying it as (or as part of) a Secondary Centre.

1.3.24 In addition, it is considered that potential development sites at the western end of Toms Lane, immediately adjacent to Kings Langley, could be considered as being located on the edge of a secondary centre (Kings Langley) according to the principles set out in the Spatial Strategy.

- **If so, would this justify Kings Langley as a Key Centre?**

1.3.25 No.

1.3.26 The Council do not consider that it is appropriate to consider Toms Lane as part of Kings Langley given the differences in character and sustainability.

1.3.27 However, an assessment has been completed according to the methodology of the Settlement Appraisal (2010) [EB12] for Kings Langley including Toms Lane.

**Kings Langley Including Toms Lane**

|                    |                                |   |  |                    |
|--------------------|--------------------------------|---|--|--------------------|
| POPULATION         |                                | 5,747 (includes Kings Langley area in Dacorum Borough)  |  |                    |
| FACILITIES         | PRIMARY SCHOOL                 | Kings Langley Primary (1300m)   |  |                    |
|                    | SECONDARY SCHOOL               | Kings Langley High School (1700m)   |  |                    |
|                    | GP SURGERY                     | The Nap (900m)  |  |                    |
|                    | CONVENIENCE STORE              | Kings Langley High Street (1000m)   |  |                    |
|                    | POST OFFICE                    | Kings Langley High Street (1000m)   |  |                    |
|                    | LIBRARY                        | 1 mobile library stop, Kings Langley Library (900m)   |  |                    |
|                    | PHARMACY                       | Kings Langley High Street (1000m)   |  |                    |
|                    | PUBLICLY ACCESSIBLE OPEN SPACE | 1 area  |  |                    |
|                    | COMMUNITY LEISURE FACILITY     | Langley Hill (1700m)  |  |                    |
| ACCESS TO SERVICES | ROAD INFRASTRUCTURE            | A4251<br>Well connected by C roads  |  |                    |
|                    | BUS SERVICE                    | 500/ 501<br>550   | Aylesbury - Watford<br>Watford – Hemel Hempstead | 30 mins<br>30 mins |
|                    | RAIL STATION                   | <b>Kings Langley</b><br>London<br>Midland   | Northampton – London                             | 30 mins            |
| CONSTRAINTS        |                                | Settlement on boundary with Dacorum Borough Council. Green Belt surrounding Kings Langley and across Toms Lane. Public open space and archaeological sites within settlement. West Coast Mainline railway dividing settlement and M25 to south. |  |                    |

|                                   | POPULATION | FACILITIES     |                  |            |                   |             |         |          |                                |                            |                | RAIL STATION | BUS SERVICE | SETTLEMENT TOTAL SCORE | SUSTAINABILITY CATEGORY |                  |
|-----------------------------------|------------|----------------|------------------|------------|-------------------|-------------|---------|----------|--------------------------------|----------------------------|----------------|--------------|-------------|------------------------|-------------------------|------------------|
|                                   |            | PRIMARY SCHOOL | SECONDARY SCHOOL | GP SURGERY | CONVENIENCE STORE | POST OFFICE | LIBRARY | PHARMACY | PUBLICLY ACCESSIBLE OPEN SPACE | COMMUNITY LEISURE FACILITY | FACILITY TOTAL |              |             |                        |                         | FACILITY AVERAGE |
| Kings Langley including Toms Lane | 5,747      | 0              | 1                | 1          | 1                 | 1           | 1.5     | 1        | 3                              | 1                          | 10.5           | 1.2          | 3           | 1                      | 5.2                     | GOOD             |

1.3.28 Although the population of the combined settlement has slightly increased, the centre of the settlement would be moved to the east by the inclusion of Toms Lane. As this is further from the centre of Kings Langley within Dacorum, the sustainability of the combined settlement would actually reduce from a total score of 5.8 for Kings Langley to 5.2 for Kings Langley including Toms Lane, although the sustainability category remains as 'good'.

1.3.29 Including Toms Lane with Kings Langley would therefore not justify Kings Langley being designated as a Key Centre, as while there would be a slight increase in population, the assessed sustainability of the centre would be reduced.

- **Should Carpenders Park be designated as a Key Centre?**

1.3.30 No.

- 1.3.31 It is acknowledged that Carpenders Park has one of the highest sustainability scores of the secondary centres in the Settlement Appraisal (2010) [EB12]. However, it is not considered that this is sufficient to justify the inclusion of Carpenders Park as a Key Centre. The Key Centres as currently identified all have larger populations and higher sustainability scores than Carpenders Park.
- 1.3.32 While Carpenders Park does provide some facilities and access to services, its size, function, accessibility and importance are not considered to be equivalent to the identified Key Centres and it would not therefore be a primary focus for future major development (Core Strategy Paragraph 3.13).