

## **Three Rivers District Council Site Allocations LDD**

### **Statement in Response to Main Issue 1:**

**1.0 Whether the SALDD has been positively prepared and whether, overall, it will deliver sustainable development in accordance with the broad thrust of the National Planning Policy Framework ('the Framework').**

#### **1.1 QUESTION 1.1**

**1.2 Whether, during the course of its preparation, there have been adequate cooperation with neighbouring local authorities and other relevant public bodies.**

1.3 The Duty to Cooperate Statement **[SD38]** and Addendum **[SD49]** has been prepared in order to demonstrate how the Council has fulfilled its duty to cooperate as set out under Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) and Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.4 These documents detail the joint working undertaken and list the jointly prepared evidence base studies and details of meetings that have been undertaken with neighbouring local authorities and other relevant public bodies that have informed the content of the LDD.

1.5 The responses to consultations, from neighbouring authorities and other relevant public bodies, have also informed the preparation of this document. The Statement of Consultation **[SA CD7]** describes the consultation undertaken during the different stages of consultation and sets out:

- which bodies and persons have been invited to make representations
- a summary of the main issues raised by those representations, and
- how those main issues have been addressed in the plan

1.6 The Infrastructure Delivery Plan **[SD30]**, which was part of the Core Strategy Examination, concluded that there are no elements of the infrastructure framework within the District that would be considered as so essential that it would prevent the development outlined in the Core Strategy from occurring but does recognise that there is a significant gap in terms of infrastructure for primary and secondary school places.

1.7 For Primary education provision the site selection process is not sufficiently advanced to make allocations a sensible or practical option. However, the Council is confident that needs can be met through the planning application process, particularly given the presumption in favour of sustainable development, which is reflected in the SALDD.

#### **2.0 Question 1.2**

**2.1 Whether it is based on a strategy which aims to meet objectively assessed requirements.**

2.2 The Site Allocations document identifies sites throughout the District for development up to 2026 to support the delivery of the Core Strategy **[SD02]**. It is the Core Strategy that sets out the strategy and objectives for the spatial

development of the District which is informed by a wide range of evidence which has objectively assessed the requirements of the District. The Inspector concluded in his Final Report on the Core Strategy that ‘...the overall strategy is soundly based on a robust and extensive evidence base.’

- 2.3 Since the adoption of the Core Strategy **[SD02]** there have been updates of several of the evidence base studies which have been submitted as part of this examination.

### 3.0 Question 1.3

#### 3.1 Whether the strategy for allocating sites is adequately justified as the most appropriate, when considered against reasonable alternatives in the context of the Core Strategy and the more recent publication of the Framework.

- 3.2 Yes. As stated above, the strategy for allocating sites is justified and the most appropriate.
- 3.3 The sites for housing have emerged through the Strategic Housing Land Availability Assessments **[EB17, EB18]** and through sites submitted to the Council during previous stages of consultation on the Core Strategy **[SD02]** and SALDD, as stated in paragraph 4.7 of the SALDD.
- 3.4 The Site Allocations Supporting Information Report **[SD42]** sets out the assessment methodology used to evaluate all sites considered as potential allocations. It includes all sites that are proposed for allocation and all other sites that have been submitted to the Council but that are not proposed for allocation.
- 3.5 The Core Strategy **[SD02]** Spatial Strategy (point 5) sets out that development sites will be identified having regard to a detailed criteria based approach taking into account whether development on the site:
- Will be accessible to public transport
  - Will not have a significant impact on the environment including in terms of impact on the Green Belt, visual amenity, heritage assets, transport and environmental quality
  - Is likely to come forward over the plan period
- 3.6 For housing sites, Appendix 2 of the Core Strategy **[SD02]** sets out the more detailed criteria.,
- 3.7 The Site Allocations document has also been subject to a Sustainability Appraisal **[SA CD3, SA CD11]** at different stages of its production to identify the potential impacts of sites in terms of economic, social and environmental terms. The appraisals were also consulted upon together with the LDD at the appropriate stages. Recommendations from the appraisals were carried through to the Site Allocations LDD.
- 3.8 The SALDD also reflects the NPPF’s presumption in favour of sustainable development in S3 of the SALDD.

#### 4.0 Question 1.4

##### 4.1 Whether the SALDD can be confidently expected to effectively deliver the planned development on the allocated sites over the years to 2026.

4.2 Yes. The Site Allocations LDD sets out the development for the District up to 2026 to meet the assessed need in line with the adopted Core Strategy. The Housing target for the period 2001-2026 is 4,500. A total of 2,442 have been delivered between 2001 and 2013 with a further 111 are being delivered in 2013/2014. This leaves 1,947 to be delivered. The Site Allocations LDD allocates 1,756 dwellings with the remainder expected to be achieved through windfall sites of 38 dwellings per year from 2021-2026.

4.3 As set out in our letter to the Inspector of the 31<sup>st</sup> July 2013, we are also expecting an application that, if approved, will deliver an additional 29 dwellings in the urban area by 2016 (originally stated as 79 dwellings). The South Oxhey regeneration area (as set out in our response to Question 7) is now likely to deliver between 318 and 415 net additional dwellings rather than the 280 indicated in the Site Allocations LDD.

4.4 The SALDD includes indicative phasing dates for the Housing Sites and Policy CP2 of the Core Strategy **[SD02]** states that the phasing for the sites will be reviewed annually as part of the Annual Monitoring Report (AMR) process and that the indicative phasing of sites may be altered having regard to the AMR and up to date information on the delivery of specific sites. Policy SA1 of the SALDD states that proposals should have regard to this phasing strategy. This provides us with the flexibility of being able to bring sites forward or back depending on the amount of housing delivered.

4.5 We are, therefore, of the opinion that the SALDD will deliver the planned development on the allocated sites over the years to 2026.

#### 5.0 Question 1.5

##### 5.1 Whether the effectiveness of the SALDD can be adequately monitored over the plan period.

5.2 Yes. The effectiveness of the Site Allocations document can be adequately monitored over the plan period. It will be assessed against the monitoring indicators set out in Appendix 7 of the adopted Core Strategy **[SD02]** as stated in paragraph 12.3 of the document and reported through the Annual Monitoring Report **[SD28]**. The appropriate indicators are listed below:

- Dwelling Completions by settlement
- Employment growth by settlement
- New and converted dwellings on previously developed land
- Total amount of employment floorspace on previously developed land
- Housing Trajectory
- Housing completions within the existing urban area
- Density of housing completions
- Gross affordable housing completions
- Percentage of new residential development contributing to affordable housing
- Tenure mix of affordable housing completions
- Total amount of additional floorspace by type
- Employment land available by type
- Total floorspace for 'town centre uses'

- Delivery of schemes identified in Infrastructure Delivery Schedule in line with indicative phasing
- Loss/increase of public open space, sport and recreation
- Amount of new residential development within 30 minutes public transport time of a GP, hospital, primary school, secondary school, major retail centre
- New dwellings in the Green Belt
- New employment floorspace in the Green Belt

## **6.0 QUESTION 1.6**

### **6.1 Whether the SALDD is sufficiently responsive and flexible to achieve the required amount of sustainable development over the plan period.**

6.2 Yes it is. As stated in response to Questions 1.4 and 1.5 above the SALDD has monitoring and phasing mechanisms in place which enables the Council to bring sites forward and/or sites being set back over the Plan period should the need arise. This will enable the Council to respond in a flexible way to achieve the required amount of sustainable development over the plan period.

## **7.0 QUESTION 1.7**

### **7.1 Whether the SALDD is complementary to and consistent with the Core Strategy and the Development Management Policies Local Development Document (DMPLDD).**

7.2 The relationship between the three plans is set out in the Introduction to the LDD. The Core Strategy provides the overarching strategy and policies and the long term vision for Three Rivers, the Site Allocations document allocates the sites for development and the Development Management Policies document sets out the policies against which all planning applications will be assessed.

7.3 The Site Allocations document identifies the sites throughout the District for development to support the delivery of the Core Strategy and the Community Strategy.

7.4 Each chapter of the SALDD refers the reader to the Core Strategy and/or the appropriate policy within the Core Strategy and Development Management Policies document. For example the:

- Housing Site Allocations chapter refers to Core Strategy Policies CP2, CP4 and CP8
- Employment Site Allocations chapter refers to Core Strategy Policy CP6
- Education Allocations chapter refers to the Core Strategy
- Retail Allocations chapter refers to Core Strategy Objective 8 and Policy CP7
- Open Space Allocations chapter refers to Core Strategy Objective 11 and Development Management Policy DM11
- South Oxhey chapter refers to Core Strategy Policy PSP2
- Langleybury and the Grove chapter refers to Core Strategy Policy CP6
- Green Belt chapter refers to Core Strategy Policy CP11
- Monitoring and Delivery chapter refers to the monitoring framework in the Core Strategy

## **8.0 QUESTION 1.8**

### **8.1 Whether it is necessary or appropriate for the SALDD to depart from the principles contained within those documents and, if so, to what degree.**

- 8.2 No. It is not necessary or appropriate for the SALDD to depart from the principles contained within the Core Strategy and the Development Management Policies LDD. These documents have been through the examination process and now form part of the Development Plan for the District.
- 8.3 Whilst the NPPF provides the opportunity to depart from the adopted Plan it is not an approach the Council think appropriate.
- 8.4 The Council has an up to date Core Strategy adopted as recently as October 2011. There is thus no need to expand the remit of the SALDD to undertake the function of a review of the Core Strategy. The Council is putting in place its suite of LDDs in a timely fashion and has flexibility through monitoring to meet emerging needs.