

## Three Rivers District Council Site Allocations LDD

### Statement in Response to Main Issue 3:

#### 1.0 Whether the SALDD provides satisfactorily for the amount and type of local employment, shopping and green infrastructure envisaged by the Core Strategy.

##### 1.1 Question 3.1

#### 1.2 Whether the amount of additional employment land identified is adequate to achieve the intentions of the Core Strategy as set out in Policy CP6 and those of the Framework to build a strong competitive economy nationally.

1.3 Yes. Policy CP6 of the Core Strategy **[SD02]** seeks to support economic growth and continue to focus employment use within the key employment areas within the district.

1.4 Paragraph 5.59 of the Core Strategy details the findings and recommendations of The South West Herts Employment Land Update (2010) **[EB04]** which has been used to inform the SALDD. In quantitative terms it states that the District has an over supply of office floorspace, a slight undersupply of industrial and warehousing space and recommends that additional land should be developed at Maple Cross to meet demand.

1.5 Paragraph 21 of the NPPF states that LPA's should identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Paragraph 5.48 of the South West Herts Employment Land Update (2010) **[EB04]** states that 3.5 hectares of floorspace will be needed to address the deficit of industrial and warehousing space to 2026 and 2031. As set out in the South West Herts Employment Land Update (2010) **[EB04]** Maple Cross has the potential to see inward investment in the plan period. The SALDD has identified 4 hectares of additional employment land adjacent to the existing Maple Cross/Maple Lodge employment area. This is in accordance with Policy PSP3 of the Core Strategy which sets out that the Council will maintain and enhance employment opportunities in Secondary Centres but redistribute some employment floorspace through an extension of floorspace at Maple Cross/Maple Lodge.

1.6 Kennet Properties Limited (**60226/30052/Ed/C**) are fully supportive of the allocation of Site E(d) but consider there is potential for an increase in the size of the identified site through the incorporation of the adjacent redundant Thames Water depot site. The Council do not consider it necessary to extend Site E(d) as the Council has allocated sufficient land to address the needs of the District over the plan period as set out in the adopted Core Strategy. Furthermore the site is previously developed land and any redevelopment could be dealt with through the development management process.

##### 2.0 Question 3.2

#### 2.1 Whether the quality of the land identified is adequate to the task.

2.2 Yes.

- 2.3 Statutory consultees including the Environment Agency (**60248**) and Hertfordshire Biological Records Centre (**60081**) have acknowledged the planning constraints on the site. However they have raised no objection to the inclusion of the additional employment land in the SALDD because the constraints can be addressed through the development management process. For instance the Environment Agency (**60248**) stated that because of the current industrial and agricultural use of the site a preliminary Risk Assessment would be required to determine whether there is contamination on the site and whether further remediation works would need to be undertaken.
- 2.3 A planning brief will also be prepared by the Council in consultation with relevant stakeholders and those with a land interest for the Maple Lodge and Froghall Farm site to ensure the long term and sustainable planning of the area.
- 2.4 Furthermore the allocation of the site is fully supported by the landowners Thames Water.

### **3.0 Question 3.3**

#### **3.1 Whether the sites identified for mixed use further the cause of achieving sufficient sustainable development to meet both housing and employment needs.**

- 3.2 Yes.
- 3.3 The Core Strategy [**SD02**] sets out that the Council will support development that aligns economic growth with housing growth in the area in order to balance the provision of homes and jobs and reduce out-commuting. The South West Herts Employment Study Update (2010) [**EB04**] refers specifically to the redistribution of employment floorspace through mixed use development in Kings Langley Employment Area.
- 3.4 The Kings Langley Employment Area has been identified as a mixed use allocation in accordance with PSP3 of the adopted Core Strategy. As a site allocated for mixed use development, the area will provide for development including, but not limited to housing, business, industrial and storage or distribution, residential or community uses. The indicative dwelling capacity will contribute to the District's housing requirements, and redistributing employment space through mixed use development will maintain and enhance employment opportunities. The site is within an existing urban area with reasonable access to public transport, education, local shopping facilities and open space. The sites suitability as a mixed use allocation is shown in the redevelopment of the Ovaltine Factory site for housing since employment uses are now interspersed with residential.
- 3.5 As set out in the Council's letter dated 31 July 2013 and sent in response to the Inspector's letters dated 10 and 30 July individual employment and housing sites have not been identified to allow flexibility for different forms and uses of development to come forward across the site in the future. However we have received comments from Alpine Press, at the Site Allocations Preferred Options stage, stating that the indicative capacity of 150 was too low and that the Alpine Press site would be ideal as a supermarket facility to serve the local residents. There was also a representation from Gade View Investments stating that part of their site would be suitable for housing. There has also been a recent pre-application for conversion of light manufacturing premises to residential use suggesting a capacity of 40-50 dwellings. Appendix 2 of the Council's letter dated

31 July 2013 details an indicative location of these potential residential developments.

- 3.6 Imagination Technologies (**60009/30007/Ee/2**) has raised an objection to the mixed used allocation and has proposed that their site be removed from the allocation. The Council do not consider it appropriate to remove the Imagination Technologies site from the mixed use allocation. Paragraph 5.9 of the SALDD clearly states that National and Local planning policy will guide decisions on sites which are not specifically allocated for employment. Policy PSP3 of the Core Strategy states that employment opportunities in Secondary Centres which includes Kings Langley will be maintained and enhanced. Furthermore Policy CP6 of the Core Strategy sets out that the sustainable growth of the Three Rivers economy will be supported by continuing to focus employment use within the key employment areas within the District and this includes the Kings Langley Employment Area. It was recognised in a delegated report for planning application reference 12/0646/FUL *Demolition of existing building and erection of new three storey office building (Class B1) with car parking, landscaping and associated works (Phase 3)* that the Imagination Technologies proposed redevelopment 'would bring significant investment to the locality and would make and overall contribution to the economic performance of the District.'
- 3.6 The indicative phasing for developing the mixed use site is identified as 2012-2026. Over such a period of time, the Council will have greater control over the roll-out of development and mixes of land use, so different uses are not being compromised. The phasing will enable the Council to respond to economic trends and market signals for different uses, which will improve the efficiency and accuracy with which the required development can be delivered across the whole of the allocated site.

#### 4.0 Question 3.4

##### 4.1 Whether the greater scope for converting offices to housing implicit in recent changes to permitted development rights will exert a material influence on these factors.

- 4.2 The recent changes to the General Permitted Development Order, which introduced new rules allowing the change from B1 office use to C3 residential use for a period of three years, will further support the Council's delivery of housing.
- 4.3 The Council, when consulted, did not raise any objection to the proposed General Permitted Development Order changes and has therefore not opted out of the changes. As indicated by the Employment Study and Update (2010) **[EB04]** there is an over-supply of office floorspace in the District. Given the demand for housing and the availability of office space for conversion to residential use as supported by recent GPDO changes, there is likely to be a significant boost to the delivery of windfalls in the early years of the plan period. Since the permitted development changes have been introduced, two Prior Notification applications have been approved. The applications will result in a net gain of 14 residential units.
- 4.4 Notwithstanding this, the Council will continue to support economic growth in the District as set out in the relevant policies of the Core Strategy. Through the AMR the Council will monitor the amount of floorspace developed and lost in employment areas and also the amount of employment land lost to residential development. The Council will respond to economic trends and market signals for

different uses, which will improve the efficiency and accuracy with which the required development can be delivered across the whole of the allocated site.

## **5.0 Question 3.5**

### **5.1 Whether the SALDD adequately reflects the intentions of the Core Strategy to maintain and enhance accessible shopping in existing centres and rebalance provision in South Oxhey.**

5.2 Yes.

5.3 To maintain and enhance the viability, vitality and variety of shops and services within the Principal Town Centre, Primary and Secondary Frontages have been identified. Policy SA4 sets out that within identified Primary Frontages the loss of Class A1 retail uses will generally be resisted and within the identified Secondary Frontages the retention of retail will be encouraged. Uses complementary to the Primary Frontages will also be encouraged. To protect and enhance shops and services in smaller settlements the SALDD has identified Local Centres.

5.4 The Retail Capacity Study 2012 **[EB29]** identified that in South Oxhey any reorganisation of the centre will require a review to set new key frontages. It was also found that a main food outlet would be required to provide the level and range of goods to meet consumer demand. Policy SA6 of the SALDD sets out that the Council will promote the regeneration of South Oxhey to deliver improvements in shopping facilities. The Land Use Plan on page 72 of the SALDD illustrates the location of mixed use blocks with key active frontages for retail and community uses. The Development Schedule specifies the approximate size of the proposed food supermarket and other retail units.

5.5 Further information regarding South Oxhey can be found in the Issue 7 section.

## **6.0 Question 3.6**

### **6.1 Whether the SALDD will be effective in delivering the Core Strategy objective of a net gain in the quality and quantity of Green Infrastructure in the Three Rivers District.**

6.2 Yes.

6.3 Policy CP9 of the Core Strategy states that the Council will seek a net gain in the quality and the quantity of Green Infrastructure through the protection and enhancement of assets and provision of new green spaces.

6.4 The SALDD sets out the open space that has been previously allocated in the Three Rivers Local Plan 1996-2011 and new designations of open space. Although some of the identified open space sites have been used as open space, they have not previously been protected through a designation. There are also some sites that are new designations of open space such as Site OS(c) which would be an extension to Leavesden Country Park and therefore an opportunity to enhance the quality of green infrastructure in this part of the District.

6.5 A net gain in the quality and quantity of green infrastructure in the District will also be obtained through the Development Management Policies Local Development Document (DM Policies LDD) **[SD51]**. Policy DM11 of the DM Policies LDD sets out that all new residential development will be expected to

provide for open space. Further guidance on the provision of green infrastructure is set out in the adopted Open Space, Amenity and Children's Playspace SPD **[SD33]** and the Green Infrastructure Plan (2007) **[EB27]**.

- 6.6 In the monitoring year 1 April 2011 to 31 March 2012 there was provision for new public open space to serve the Leavesden Aerodrome development and surrounding area and also formed an extension to Leavesden Country Park. In addition two permissions granted during the monitoring year provided financial contributions to open space **[SD28]**.