

Three Rivers District Council Site Allocations LDD

Statement in Response to Main Issue 6:

1.0 Whether the SALDD provides satisfactorily for the amount and type of housing proposed by the Core Strategy and in the broad locations in which the latter intends it should be developed.

1.1 Question 6.1

1.2 Whether housing sites should be chosen by 'sustainability score' and 'ranking' or on the basis of their specific 'merits'.

1.3 The Spatial Strategy of the Core Strategy [**SD02**] sets out that all development sites will be identified having regard to a criteria-based approach, taking into account whether development on the site:

- Will be accessible to public transport, services and facilities
- Will not have a significant impact on the environment in terms of impacts on the Green Belt, visual amenity, heritage assets, transport and environmental quality including wildlife, flood risk and water pollution
- Is likely to come forward over the plan period.

1.4 These criteria in addition to the social, economic and environmental objectives of the Sustainability Appraisal [**SACD3**] formed the basis of the assessment of the sites. It was important to take into consideration the comments received from stakeholders and members of the public following the public consultation stages of the Core Strategy and the SALDD, and the views of elected Members at the Local Development Framework Member Working Group Meetings. Further details of the housing site selection criteria are set out in Appendix 2 of the Core Strategy [**SD02**] and the Site Allocations Supporting Information Report [**SD42**].

1.5 As set out in Appendix 2 of the adopted Core Strategy and therefore found sound by the Inspector, how well a site performed in relation to the range of planning and sustainability criteria informed the Council's decision on the sites, but in coming to the final decision the Council considered each site on its merits and took into account site specific circumstances therefore it was not always the case that higher scoring sites were automatically taken forward and that lower scoring sites were not taken forward. This is specifically highlighted on page 63 of the Core Strategy [**SD02**].

1.6 The sites that have been identified in the SALDD are sited in sustainable locations and will be suitable, deliverable and achievable during the plan period.

1.7 The Council considered it was important to undertake a scoring, weighting and ranking system of a range of potential sites to determine their suitability for housing, as well as to look at the specific merits of the site and enable local democratic choice.

1.8 The NPPF sets out that Local Plans must be founded on a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives (paragraph 182). Consideration of alternatives is one of the key tests of soundness, so sites must be compared against alternatives to ensure that sustainable, achievable and economically viable sites are brought forward during the plan period.

- 1.9 The scoring of sites was one tool in the assessment of alternative sites, however the specific merits of each individual site were also considered, as were other factors such as responses received to consultation.

2.0 Question 6.2

2.1 Whether the availability, suitability and viability of each of the allocated housing sites is based on firm knowledge or, alternatively, realistic assumptions informed by credible evidence.

2.2 Yes.

2.3 The allocated sites have been informed by an evidence base that has been updated on a regular basis.

2.4 Urban Housing Capacity Study (2005) [EB01]

The joint study with Dacorum District Council and Watford Borough Council sought to identify sites and buildings with the potential for new housing development in the main town and urban areas within the District.

2.5 Strategic Housing Land Availability Assessments

In accordance with paragraph 159 of the NPPF the Council prepared a Strategic Housing Land Availability Assessment (SHLAA) in October 2008 [EB17] and a SHLAA update in 2010 [EB19]. It provides a technical assessment of the potential supply of housing across the District. It assesses the suitability, availability and achievability of sites for housing. In particular it

- Identifies sites that have potential to accommodate the new housing.
- Assesses the housing potential of these sites (e.g. taking into account density and physical constraints).
- Assesses when they are likely to come forward.

The SHLAA studies have taken account of information provided by landowners and developers on the expected capacity and deliverability of sites in the assessments.

The findings have been used to inform decisions about which sites are most suitable, deliverable and achievable during the plan period.

2.6 Sustainability Appraisal

The Sustainability Appraisal [SA CD11] has been used as a tool to assess the social, economic and environmental effects of the housing sites set out in the SALDD which helps demonstrate that the housing site allocations are suitable given the reasonable alternatives. The assessment found that Policy SA1 of the SALDD and the identified housing sites will contribute to achieving the housing targets set out in the Core Strategy as well as support the good quality housing and affordable housing SA objectives.

2.7 Sequential and Exceptions Test [EB28]

Sequential tests justify the allocation of sites in relation to flood risk and development. The findings of the report are based on the baseline data of the

Strategic Flood Risk Assessment [EB14]. The Sequential Test [EB28] results indicate that all of the housing sites allocated in the SALDD are sequentially preferable sites in flood risk terms and may have a role to play in meeting the District's requirements for development.

2.8 **Five Year Housing Land Supply Pro-Formas**

In order to inform the assessment of the deliverability of housing sites and expected phasing of completions, since 2009 landowners and developers of sites have been asked to complete a pro-forma on their site setting out information on the availability, suitability and achievability of the site and the expected phasing of completions. Landowners and developers are asked to complete the pro-formas on an annual basis and this information has been used to inform the allocation of sites.

2.9 **Consultation Responses [SA CD7]**

Landowners have also put forward and promoted housing sites following public consultation of the Core Strategy and the SALDD and information provided as part of consultation responses has been used to update the evidence base (in particular the SHLAA [EB17 and EB19]) and the allocation of sites.

3.0 **Question 6.3**

3.1 **Whether allocated sites currently in active use for other purposes are appropriately allocated for housing, having regard to employment and local services.**

3.2 All of the housing sites that have been identified in the SALDD that are currently in active use are appropriately allocated for housing. The sites are suitable and are located in sustainable locations as set out in credible evidence. Landowners have been contacted as part of the consultation process of the Core Strategy and the SALDD, to obtain their views on the potential to develop their sites for residential use. It is important to acknowledge that the proposed sites do not fall into key employment areas and are not local services in the District that are safeguarded by existing and/ or proposed planning policies. The contribution the sites would make to meet the housing need in the District would outweigh the loss of the local services and employment.

3.3 In addition, it is noted that in some cases where existing development is not making the most efficient use of land, the allocation of the site for additional housing would allow redevelopment to both re-provide the existing use and additional residential accommodation which would be a more efficient use of land in accordance with Core Strategy Policy CP3.

4.0 **Question 6.4**

4.1 **Whether the allocated sites are broadly in the right locations.**

4.2 Yes.

4.3 Policy CP2 of the Core Strategy sets out that housing provision will be made primarily from within the existing urban area (approximately 75% of total housing development between 2001-2026) and also from housing sites at the most sustainable locations on the edge of existing settlements (approximately 25% of

total supply between 2001 -2026). The Inspector confirmed in the final report on the examination of the Core Strategy that this strategy is soundly based on a robust and extensive evidence base.

- 4.4 Table 6.1 sets out the approximate percentage of District housing requirements within the different levels of the settlement hierarchy specified in the Core Strategy and the approximate percentage of identified housing sites within the different levels of the settlement hierarchy specified in the SALDD.

Settlement Hierarchy	District Housing Requirements (approximate %) (set out in the Core Strategy (adopted 2011))	Identified District Housing (%) (set out in Site Allocations (Proposed Submission November 2012))	Net Dwelling Completions 2001-2013 (%)
Principal Town	15%	15%	18%
Key Centre	60%	70%	53%
Secondary Centre	24%	13%	28%
Development in Villages	1%	1%	1%
Other		1%	

Table 6.1: Percentage of District Housing Requirements within the Core Strategy Settlement Hierarchy

- 4.5 The percentages set out in the Core Strategy are approximate and provide clear direction as to where development should go in broad terms. In accordance with the Spatial Strategy, the percentages clearly direct most development to the Principal Town and Key Centres which have been assessed as the most sustainable locations, with some development to occur in the Secondary Centres and some limited development to take place in the villages at Bedmond and Sarratt to meet local needs and maintain vitality. The SALDD is in accordance with this approach. In terms of sites that are located within the Principal Town and Key Centres there is only a difference of 4% between the Core Strategy and SALDD percentages.
- 4.6 It is considered that the approximate percentages provide sufficient clarity about the scale of housing development, while also providing flexibility for the SALDD to identify the most sustainable and appropriate sites for housing within each level of the settlement hierarchy. By indicating approximate percentages, the Council has taken a flexible approach rather than an unduly prescriptive or specific approach.

5.0 Question 6.5

5.1 Whether the allocated sites are, in practical terms, accessible.

5.2 Yes.

5.3 The majority of the allocated sites are located in the Principal Town and Key Centres which have been assessed as appropriate sustainable locations. Many of the sites are previously developed with existing access arrangements that could

be upgraded/modified as required as part of development. Those sites that are not previously developed are on the edge of existing centres where it would be possible to provide connections to existing transport networks.

- 5.4 It is considered that any prospective practical accessible issues could be addressed through the planning application process.

6.0 Question 6.6

6.1 Whether the density assumed for each site is a realistic and appropriate reflection of its potential, having regard to social, environmental and economic considerations and the explicit intentions of Core Strategy policy CP3.

- 6.2 Yes.

- 6.3 The Strategic Housing Land Availability Assessment (SHLAA) [EB19] identified the dwelling capacity of sites based on design case studies which recognise the characteristics of the surrounding areas rather than on standard densities. The design case studies provided a low- and high-density estimate of capacity, and a midpoint between these ranges was taken. The SHLAA argues that using the mid-point figure would balance out the density of sites coming forward above and below the mid-point.

- 6.4 Where appropriate, the SHLAA mid-point capacities have been amended in allocating sites taking into account other sources of evidence (for example the Strategic Flood Risk Assessments [EB14] and [EB14a]), consultation responses, including from landowners and developers and formal planning pre-application enquiries.

- 6.5 The densities are an indicative figure which will provide flexibility for the SALDD. However it is anticipated that sites will be developed in general accordance with these figures. This assumption is supported by monitoring data which shows that sites which had draft allocations for housing development during the evolution of the Site Allocations document but have since come forward for development and as a result were not included as allocations have been granted permission in general accordance with the draft allocation indicative capacity as indicated in Table 6.2 below:

Site	Most Recent SALDD Consultation Stage Site Included in	Draft Allocation Indicative Capacity	Number of Residential Units Permission Granted for	Difference
Delta Gain, Carpenders Park	Core Strategy Further Preferred Options (Feb 09)	25	31	+6
253 Watford Road, Croxley Green	Core Strategy Further Preferred Options (Feb 09)	25	10	-15
189-191 Watford Road, Croxley Green	Core Strategy Further Preferred Options (Feb 09)	7	7	0
Gade View Gardens, Abbots Langley	Core Strategy Further Preferred Options (Feb 09)	10 (net)	10 (net)	0

Breakspear Public House, Abbots Langley	Core Strategy Further Preferred Options (Feb 09)	10	13	+3
Happy Man Public House, Mill End	Core Strategy Further Preferred Options (Feb 09)	10	4 (plus a retail store)	-6
The Queens Drive, Mill End	Core Strategy Further Preferred Options (Feb 09)	25	27	+2
Land at Arnett Close/Upper Hill Rise, Rickmansworth	Core Strategy Further Preferred Options (Feb 09)	5	5	0
Grove Crescent Car Park, Croxley Green	Core Strategy Further Preferred Options (Feb 09)	5	6	+1
Adjacent 28 Maple Lodge Close, Maple Cross	Core Strategy Further Preferred Options (Feb 09)	4	4	0

Table 6.2: Number of Dwellings of Sites previously included in the SALDD with planning permission

7.0 Question 6.7

7.1 Whether, having regard to the above matters, the likely distribution of the planned housing will be sufficiently in accordance with the intentions of the Core Strategy to produce a spatial outcome that may be considered sustainable as the strategy intends.

7.2 Yes.

7.3 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, with more limited development in Secondary Centres which are considered less sustainable and some limited development in Villages to meet local needs. As set out in the response to 6.4 above, the SALDD is in accordance with this approach. 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.

7.4 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.

8.0 Question 6.8

8.1 Whether, having regard to the above matters, the temporal outcome will serve to sustain a housing trajectory that will provide for the minimum

requirements of the Framework in respect of ongoing housing land availability.

- 8.2 Yes.
- 8.3 As set out in the responses to 6.2 and 6.6 above, it is considered that the allocated sites are deliverable and at a capacity commensurate with the allocation.
- 8.4 The identified housing sites are phased over the plan period with respect to this information. As set out in Policy CP2 of the Core Strategy **[SD02]** the Annual Monitoring Report will set out the latest information on housing supply, including an assessment of whether there is a deliverable five year supply of land for housing. The phasing strategy for sites will be reviewed annually as part of the Annual Monitoring Report process and indicative phasing of sites may be altered having regard to the Annual Monitoring Report and up to date information from landowners and developers on the delivery of specific sites.
- 8.5 The Council proposed a main modification to Policy SA1 in a letter dated 8 August 2013 to the Inspector. The modification **[PC34]** sets out when the earlier release of identified edge of settlement sites phased at the end of the plan period would be considered in accordance with Core Strategy Policy CP2. The amendment to the policy will provide flexibility to respond to changing conditions and help ensure that there is a continuous supply of deliverable land for housing.

9.0 Question 6.9

9.1 Whether the intended phasing of the allocated sites over the plan period is sufficiently clear and robust to be effective and whether it will, in practical terms, serve Core Strategy and Framework intentions to promote sustainable development.

- 9.2 Yes.
- 9.3 Policy CP2 of the Core Strategy **[SD02]** sets out that the phasing of individual sites will take into account the sustainability of each site, the deliverability of housing on the site, and likely infrastructure requirements.
- 9.4 Sites that contribute better to sustainability objectives, are deliverable and do not have infrastructure requirements that will require a long lead in time are phased earlier than sites that contribute less well to sustainability objectives, are not deliverable in the shorter term or require a lead in period for infrastructure provision.
- 9.5 The SALDD sets out an indicative phasing strategy for the development of housing sites which will guide the release of sites. The phases are in five year bands to provide flexibility.
- 9.6 More detailed phasing information is and will continue to be set out in the Annual Monitoring Report. With regards to the latest monitoring information, and as set out in Core Strategy Policy CP2, the phasing of individual sites may be altered with regard to monitoring information including whether the Council has a five year supply of deliverable sites for housing and up-to-date information from landowners and developers on the delivery of specific sites. The phasing of sites will be reviewed through the Annual Monitoring Report.

10.0 Question 6.10**10.1 Whether there are key infrastructure constraints that will materially influence the above matters over the course of the plan period and, if there are, whether sufficient account has been taken of them.**

10.2 No there are no key infrastructure constraints that will materially influence the above matters over the course of the plan period.

10.3 The Infrastructure Delivery Plan (IDP) **[SD30]**, considered in the examination of the Core Strategy, identifies the infrastructure requirements needed to support the planned growth in the District over the plan period from a range of service and infrastructure providers. Whilst there are no elements of infrastructure considered as so essential that it will prevent development outlined in the Core Strategy from occurring, the IDP does highlight gaps in infrastructure across the District. Where these have been identified they have been included in the Place Shaping Policies of the Core Strategy **[SD02]** and Policy CP8 of the Core Strategy seeks to ensure that development will provide, or make adequate contribution towards the provision of infrastructure in the District.

10.4 The IDP **[SD30]** recognises that there is a significant gap in terms of the provision of primary and secondary school places; that Hertfordshire County Council is committed to a new secondary school and will be looking at increasing primary school provision either by the extension of existing primary schools or the provision of a new primary school. Issue 4 and the Statement of Common Grounds **[SoCG1]** **[SoCG2]** between Three Rivers District Council and Hertfordshire County Council cover these issues.

10.5 There are no identified key infrastructure requirements that would need to be provided in order to release any of the allocated sites for development and therefore it is not considered that there are any infrastructure constraints that would materially influence the delivery of sites.

11.0 Question 6.11**11.1 Whether it is reasonable and realistic to rely on a windfall allowance of 38 dwellings per annum beyond 2021.**

11.2 Yes.

11.3 The Inspector explained in the final report on the examination of the Core Strategy **[SD02]**, that the inclusion of a modest allowance for small windfall sites in the final years of the plan adds flexibility and does not undermine the capability of the Core Strategy to deliver its full housing allocation.

11.4 The Core Strategy **[SD02]**, states that a windfall allowance reflects the difficulty of identifying suitable land for development within the District which is highly constrained. If a windfall allowance were not included, there would be greater requirement to identify Greenfield/Green Belt sites for development in the District, contrary to the Core Strategy Vision, Objectives and Spatial Strategy.

11.5 As set out in the Strategic Housing Land Availability Assessment Update (2010) **[EB19]**, there is a much reduced identified housing capacity beyond the first 10 years of supply and, in particular, very little urban capacity in years 11-15 and 16-20 as a result of the difficulty of identifying longer term opportunities for the

re-use of previously developed land, the difficulty of identifying longer term opportunities for the development of small sites and the approach of the SHLAA to testing sites for deliverability which was not part of Urban Capacity Studies. There are therefore considered to be genuine local circumstances justifying the inclusion of a windfall allowance beyond the first 10 years of supply.

- 11.6 Where a windfall allowance is justified, the Strategic Housing Land Availability Assessment Practice Guidance¹ states that this should be based on an estimate of the amount of housing that could be delivered on land that has not been identified in the list of deliverable/developable sites or as part of broad locations for housing development.
- 11.7 The SHLAA Update **[EB19]** identifies that sources of windfalls expected to contribute to housing supply are redevelopment of sites of between one and four dwellings to flats or houses and new build or conversion/redevelopment from non-residential uses to provide between one and four dwellings. Although larger windfall sites have come forward for development in the past, and may occur in future, these are much more difficult to predict and therefore, the SHLAA Update does not propose an allowance for larger windfall sites.
- 11.8 Monitoring information set out in the SHLAA Update **[EB19]** shows that an average of 38 dwellings per year have been completed from the identified sources of windfalls. Supply from windfalls has come from across the whole District, and it was therefore not possible for the SHLAA Update to identify broad locations where the supply is likely to continue, further than 'within the urban area'.
- 11.9 Given very high house prices in the District which are expected to remain strong as a result of the District's location on the edge of London and the Green Belt, pattern of development and character of the District, it is anticipated that patterns and rates of development from these sources will continue at approximately the same rate across the plan period. The monitoring information in Table 6.3 below shows that there have been an average 37.9 windfalls delivered from small sites which is consistent with the 38 dwelling per year windfall allowance identified in the SHLAA Update **[EB19]** and the adopted Core Strategy **[SD02]**.

	Net Windfall Completions from Redevelopment of 1-4 dwellings to flats or houses	Net Windfall Completions from Newbuild, or Conversion or Redevelopment from non-residential uses to 1-4 dwellings	Total Net Windfalls	Total Net Completions
2001/02	34	16	50	365
2002/03	28	26	54	233
2003/04	16	13	29	138
2004/05	10	15	25	73
2005/06	12	24	36	197
2006/07	17	15	32	335

¹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11500/399267.pdf

2007/08	2	20	22	254
2008/09	31	26	57	331
2009/10	12	26	38	48
2010/11	8	30	38	107
2011/12	9	38	47	185
2012/13	5	22	27	176
Average	17	21.1	37.9	203.5

Table 6.3: Total Net Windfalls

- 11.10 The windfall allowance of 38 dwellings per year beyond the first 10 years of supply is therefore considered to be realistic and reasonable.
- 11.11 The recent changes to the General Permitted Development Order, which introduced new rules allowing the change from retail use (empty shops) and office use to residential use, will further support the Council's delivery of housing. 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.
- 11.12 As set out in the Core Strategy, the windfall allowance will be monitored annually and revised as appropriate through the Annual Monitoring Report and housing trajectory updates.

12.0 Question 6.12

12.1 Whether there are key environmental constraints including flood risk, groundwater protection and biodiversity objectives that will materially influence the above matters over the course of the plan period and, if there are, whether sufficient account has been taken of them.

12.2 No.

12.3 The SALDD has been amended so that the key planning constraints for each of the housing sites are specified in the document to ensure that developers and applicants are fully aware of the planning constraints (see **[SA CD9]**). For example, in the Comments box for Site H (7) it states that part of the site is located in Source Protection Zones 1 and 2. There were no constraints identified that would prevent the development of any of the allocated sites. The Council considers that any identified planning constraints can be addressed and mitigated through the planning application process and would not materially affect the delivery of housing on these sites.

13.0 Question 6.13

13.1 Whether, having regard to the above matters, alternative and/or additional housing sites should be allocated for release during the plan period, so as to meet the requirements and intentions of the Core Strategy and the Framework.

13.2 No.

13.3 In accordance with the NPPF the Council has identified a supply of specific, developable sites for growth over the plan period that meet the requirements and intentions of the Core Strategy. Additional housing sites are not required to be allocated in the SALDD.

13.4 The Three Rivers housing trajectory which is a forecast of how we plan to meet housing targets to 2026 is set out in the Annual Monitoring Report 2011-2012 **[SD28]**. This will be updated annually through.

13.5 It is considered that there is sufficient flexibility within the SALDD to ensure that the District will be able to meet development objectives.

14.0 Question 6.14

14.1 Whether, in this context, specific alternative and/or additional housing sites advanced by objectors to the SALDD have decisive merits.

14.2 The Council considers that the sites identified in the SALDD are the most appropriate sites to meet housing needs in the District being sited in sustainable locations and being suitable, deliverable and achievable during the plan period. It is not considered that sites advanced by objectors have merits over the Council's sites as set out in the Schedule of Representations (July 2013) **[SA CD5a]**.