

Three Rivers District Council
Site Allocations LDD
Closing Remarks on behalf of the District Council

Overall Position

The Council has moved quickly to get its suite of LDDs in place.

The Core Strategy was adopted on the 17th October 2011 and it contemplates a suite of daughter documents to include:

The Development Management Policies LDD which was adopted in July 2013

This Site Allocations LDD which is hoped will be adopted in the early part of 2014 which leaves the Gypsy Traveller and Travelling Showpeople LDD which it is hoped will be submitted in 2014.

It has been suggested to you that the Council should revisit the issue of Housing Need in the context of the NPPF and, if that is required, undertake a fundamental review of the Green Belt.

There is no requirement on the Council to undertake either of those exercises in the context of a Site Allocations LDD which relies on an Adopted Core Strategy. Whilst the NPPF permits a Local Authority to prepare a single 'Local Plan' there is absolutely no indication that any Authority with a Core Strategy adopted prior to the NPPF should abandon its LDD programme and start all over again. Indeed there is a very good reason for not doing so.

Such a process would inevitably take several years. In the meantime, and in the absence of a Site Allocations LDD, there would be a planning vacuum which would result in Planning Applications coming forward on an unplanned ad hoc basis and Planning Appeals being determined similarly on a 'first past the post' basis. This is not good planning and *the need is* to get the suite of LDDs which support the Adopted Core Strategy in place in a timely fashion.

When the Council reviews its Core Strategy then it will need to revisit the issue of need on the basis of the NPPF; it will also need to undertake a fundamental review of the Metropolitan Green Belt at that stage because it is not going to be possible to find sufficient development for the next plan period without undertaking such an exercise.

The SALDD seeks to do exactly what the Adopted Core Strategy says it should do, namely:-

1. Provide the quantum of development indicated in the Core Strategy.
2. In the locations indicated in the Core Strategy.
3. Make some minor Green Belt alterations necessary to provide that development.

All as clearly set out in the Core Strategy

Quantum of Development

I am concentrating these remarks on the issue of housing which, as usual, has provided the focus for most of the representations. It is our case to say that sufficient land has been allocated in the SALDD to meet the balance of the figure required by the Core Strategy. The Core Strategy sets a target of 4500 dwellings 2001-2026. 2442 dwellings have been delivered 2001 – 2013 and it is projected that 210 will be delivered 2013/14. This leaves a residual target of 1848 dwellings to be provided. The Allocations, together with extant Permissions and a modest assumption in relation to windfall, results in a total in the plan period, which almost precisely matches the requirement. This has been characterised at the hearings as *'just enough'*.

However there are cogent reasons to indicate that this target is likely to be comfortably exceeded over the plan period:-

1. The buoyant nature of the housing market in this area needs to be taken into account. For the eleven year period 2001/2 – 2012/13 there has never been a situation where the cumulative requirement has been below target. This period includes five years of fierce recession with a depressed housing market, lack of mortgage availability and falling property prices over the country as a whole. The District has been largely immune to that process which is why the cumulative target over an eleven year period has always been exceeded.
2. Such is the buoyancy of demand and the ability of the market to produce sites that the Council has had, on two occasions, to impose moratoria to limit the take up of housing to ensure that housing allocated is available over the whole of the plan period. The Council has proposed phasing to ensure availability of housing land throughout the plan period to 2026. That in itself provides flexibility for the Council who via monitoring can bring forward sites allocated for the later part of the plan period should that be necessary and then provide further sites via the review of the Local Plan.
3. Since the preparation of the SALDD the Council has done considerably more work on the South Oxhey Regeneration project which, on a design led basis, and in preparation for an outline Planning Application, has indicated that the main site will conservatively yield 360 dwellings instead of the previously forecast 280. We will propose a change to the numbers to incorporate those additional 80 dwellings which again will give flexibility over and above the requirement of 4500 dwellings over the plan period.
4. The full impact of the revisions to the GPDO permitting change of use from office to residential without Planning Permission for a period (in the first instance at least) of three years is unknown. Enquiries continue to be made and this will push windfall provision forward. In some cases the contribution may be substantial. For example

an enquiry has been received in relation to an office building in Rickmansworth which, on a very preliminary view, may well yield between 50 and 80 units.

5. Unlike the last five years, which have been years of recession, the property market is now emerging from recession and the ingenuity of the market place will ensure that windfalls continue to be produced.

Thus you can have every confidence that, as always in Three Rivers, the cumulative target will continue to be exceeded throughout this plan period.

We therefore say that no additional allocations are required to enable the Council to meet the Core Strategy target of 4500 dwellings over the plan period to 2026

Location of Development

The Core Strategy provides that over the plan period the principle town of Rickmansworth should provide approximately 15% of the requirement;
for key centres the figure is 60%;
for secondary centres the figure is 24% and for villages the figure is 1%.

Taking the development already completed together with permissions at 2013, the allocations in the LDD it is forecast that Rickmansworth will take 15.4%;
the key centres 58%;
the secondary centres 22 %; and villages 0.7%.

This displays a remarkable consistency with the Core Strategy particularly when (inevitably) the percentages set out in the Core Strategy are stated to be 'approximate'. That leaves a figure of 4% in the category of 'other'.

The Core Strategy at 3.14 indicates that '*major development in other parts of the District needs to be carefully considered because of lower accessibility but it is not necessarily precluded*'. Any such development comes within the category of 'other'. Where there is such a close correlation between the spatial distribution in the Core Strategy and the predicted out turn via sites already brought forward and those to be allocated in the SALDD it is the Council's position to say that the local democratic process which has led to the site allocations being brought forward should be supported because of the close accord with the spatial distribution contemplated by the Core Strategy.

As you know the Council used a points system to 'rank' sites. There is a degree of subjectivity involved in ascribing points to factors. It is simply a tool and the Core Strategy itself makes clear in the final paragraph of Appendix 2 that:-

'In coming to a final decision the Council will consider each site on its merits and take into account site specific circumstances. It may not be the case that higher

scoring sites will automatically be taken forward and that lower scoring sites will not be taken forward'.

It is thus an exercise of limited value to suggest that an allocated site should be deleted and an omission site promoted on the basis that the omission site has a higher points score. The selection of sites is essentially a matter for local determination. The real question is whether the sites selected accord with the Core Strategy and, for the reasons explained, we believe firmly that they do.

On an individual site basis there has been some debate about what constitutes 'settlement edge'. It is the Council's view that that phrase does not demand that sites are physically adjacent to the existing settlement to constitute 'settlement edge'. You have the detailed evidence so I don't repeat it here.

Conclusion

For all these reasons we commend the Site Allocations document to you as a *sound* document. If, despite the Council's strongly held view that the plan is sound, you consider that modifications are necessary to make it sound then the Council is likely to respond positively to your comments and to invite you to make appropriate modifications.

In conclusion, and on behalf of both the Council and other participants, can I express our grateful thanks for the courtesy and good humour which you have displayed to us all throughout the process.