

Three Rivers District Council Local Development Framework
Core Strategy Further Preferred Options – November 2009
Response by CPRE Hertfordshire

**Question 20. Do you agree with the changes proposed to Core Strategy Policy CP2:
Preferred Policy Approach on Housing?**

No.

In our response to the Core Strategy Preferred Options February 2009 consultation, we welcomed the apparent commitment to maintain the Green Belt except for minor revisions where appropriate (draft Policy DC1) and supported the sequential approach to housing supply indicated in draft Policy CP2. We also questioned the Council's proposal to adopt Spatial Strategy Option 3, which involved making planned provision for longer-term development on the edge of existing settlements within identified broad areas of growth. This was illustrated on Map 5 which showed two non-employment sites in the Green Belt on the edge of existing settlements. One of these (Woodside Road, Abbots Langley) has now been dropped, but has been replaced by several new or revised housing sites in the Green Belt that have been put forward for consideration in the current consultation document. Part of the reason for this is that the housing supply period has been extended from 2021 to 2026.

In the light of this, we have the following comments on revised draft Policy CP2.

The third paragraph, first sentence has been changed to "*Provision is made through the identification of specific housing sites in the Core Strategy*" (instead of *Site allocations document*). Paragraph 7.27 explains that, while consideration of smaller sites is not normally a matter for core strategies, these sites have been identified in the Core Strategy because they form a critical part of the overall housing supply. We infer from Endnote c to Policy CP2 that the Council's intention is not to produce a Site Allocations document (as would normally be expected) and that all the specific housing sites anticipated to arise in the period up to 2026 have been identified now.

We question whether this is the most appropriate approach in terms of PPS3 and PPS12. Chapter 4 of PPS12 emphasises that core strategies may allocate strategic sites for development and should not be held up by the inclusion of non-strategic sites (which should be dealt with in a separate DPD, understood). We do not believe that it is possible for the Council to identify, at this stage, all the specific housing sites that will become available over the next 15 years. Accordingly, we consider that the housing supply figures given in Figure 8 are, if anything, an under-estimate, and that the total supply to 2026 will prove to be greater than the 5085 units shown.

As a result, we consider that the Council's commitment to maintaining the Green Belt should be strengthened by adding after item 3 under "*sequential approach*":

"Preference will not be granted for housing development on Green Belt sites unless these have been rigorously assessed through the LDF process and expressly designated as strategic housing sites."

There is a typographical error in the third line of Policy CP2: "*with the existing urban area*" should presumably read "*within ...*".

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We object to the inclusion of the following sites:

Killingdown Farm, Croxley Green

This site is entirely in the Green Belt. The original proposal was for 30 dwellings in an area centred on the farm buildings. The proposed enlargement of the site would extend it right up to Little Green Lane to the north and west, and would represent a significant urban extension into the Green Belt. The release of this site would also weaken the case for retaining the adjacent site between Killingdown Farm and Little Green Junior School in the Green Belt.

The western half of the site lies within a designated Conservation Area. It is therefore subject to the restrictive conservation area policies in the adopted Local Plan and the emerging Core Strategy. It is difficult to see how extensive housing development of the site could be reconciled with this.

There is a Wildlife Site immediately to the west of the Killingdown Farm site. Housing development at Killingdown Farm on the scale proposed would inevitably have an adverse effect on the Wildlife Site and is unlikely to outweigh the nature conservation value of the site (Local Plan Policy N.2 refers).

In the consultation document Appendix 5: Housing Sites Overall Scores, based on the Council's assessment of how well a site performs in relation to a range of planning and sustainability criteria, the Killingdown Farm site scores 669 (in a range of scores from 443 to 1012) which is low. It is difficult to see what merits or specific site circumstances exist to make an exception by allocating this site for housing development.

Land at Waterdell, Bricket Wood

This site is in the Green Belt. If it were to be released from the Green Belt by Three Rivers District Council, there would be no defensible boundary because it would follow the administrative boundary between Three Rivers and St Albans Districts, which at this point meanders through the Building Research Establishment site.

The description of the site in Appendix 3 states "*Whole site extends into St Albans District*". However, we are not aware of any definite proposal By St Albans District Council to allocate the rest of the Waterdell site for housing development. The St Albans Emerging Core Strategy, July 2009 lists the BRE site as a proposed strategic housing site for the period to 2026, but there is no indication that this includes the Waterdell part of the site. On the contrary, we would expect any development of the BRE site for housing and new employment buildings to be within the already developed area of the site, and not in the relatively undeveloped northern part of the site.

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Development of the whole of the Waterdell area would cause the settlement of Bricket Wood to extend right up to the M1 motorway and the Building Research Establishment. If the Fairways Farm/Penfold Golf Course, Garston site were to be developed also, as proposed in this consultation document, Bricket Wood would coalesce with the Garston area of Watford. While we are not specifically objecting to the release of the Fairways Farm/Penfold site, we would be opposed to both it and the Waterdell site being allocated for development.

Land South of St Joseph’s School, South Oxhey

This land is in the Green Belt, and is shown in Appendix 3 as a school playing field. No justification is given in the consultation document for releasing this land from the Green Belt or for changing its use from school playing field to residential.

If the land were to be put forward for disposal or change of use, the consent of the Secretary of State for Children, Schools and Families would presumably be required in accordance with current legislation for the protection of school playing fields. Government policy is that there is a general presumption against changing the current pattern of school playing field provision by disposal or change of use.

The site is adjacent to Oxhey Woods, which is designated as a Nature Reserve, Wildlife Site and Publicly Accessible Open Space in the current Three Rivers Local Plan. The nearby Little Furze School site (to which we objected in the previous Preferred Options document) has been confirmed by the Council as a preferred option for housing development. If both sites were released for development, it would tightly constrict the spur of Oxhey Woods extending up to Gosforth Lane and would lead to further pressure for development in that area.

Headline Results of Core Strategy Preferred Options Consultation March 2009

We question the inclusion, in Appendix 1 of the consultation document, of the charts showing the level of public support for the various housing sites put forward at the initial Preferred Options stage. This indicates that the Council’s conclusions have been influenced by a simple quantitative voting process, rather than by taking account of the quality of comments submitted. The fact that nearly every site received significantly more support than opposition suggests that there has been a considerable degree of ‘tactical voting’ going on.

This provides a basis for questioning the soundness of the Core Strategy when it reaches the Public Examination stage, if it can be shown that sites have been selected in accordance with the degree of public support rather than on their own merits.