

## **Examination of Three Rivers Site Allocations Local Development Document**

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Dear Mrs May,

### **Examination of Site Allocations Local Development Document (SALLD)**

You will recall that, at the end of the Hearing Sessions last month, I undertook to write to you this month regarding my preliminary conclusions, in advance of my formal report, as to the changes necessary in order to make the SALDD sound in the sense now intended by the relevant legislation and the NPPF, i.e. positively prepared, justified, effective and consistent with national policy to promote sustainable development.

A number of intended changes have already been signalled by the Council in response to my early concerns regarding the contradiction, in most instances, of 'allocated' sites remaining in the Green Belt. The Council has also signalled its intention to positively address the similar difficulties at Leavesden Studios highlighted early on in the Hearing Sessions.<sup>1</sup> The content of this letter, which explains the additional changes I consider to be necessary to make the plan sound in its present context, has substantive implications for a small number of the changes signalled in advance of the Hearing Sessions, but none for those at Leavesden. You may take it that all the changes covered in this letter are necessary to make the SALDD meet the above requirements embodying an appropriate degree of flexibility to adapt to rapid change and will be comprehensively reasoned in my final report.

To be adequately helpful this letter is necessarily lengthy and foreshadows, in summary form, much of the content of what will ultimately be my formal report, but the 'headline' points are as follows:-

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<sup>1</sup> My letter of 8 November 2013, to which the Council responded on 19 November 2013.

1. The SALDD as submitted cannot be considered sound, but with appropriate modifications it can be made so, without undue delay or further significant development of the evidence base.
2. Although national policy provides for the safeguarding of land excluded from the Green Belt for future development beyond the plan period, the circumstances of Three Rivers District are such that substantial safeguarding of this nature would, in effect, require a major review of the Green Belt boundary, well beyond the scale of alteration anticipated by the adopted Core Strategy. This would be premature. As yet, the evidence base and strategic context are insufficiently developed to inform such a review and it is in the public interest to complete the Council's 'Local Plan' broadly as currently conceived.
3. Notwithstanding the above, the close matching of housing allocations to Core Strategy requirements, which includes the (justified) reliance on some expectation of windfalls, introduces an unduly constraining rigidity in respect of the anticipated housing land supply, which renders the SALDD vulnerable to unexpected non-delivery of sites or unexpected delays in reviewing the 'Local Plan' and adopting a replacement. In the context of national priorities to deliver sustainable housing development, such lack of flexibility is inconsistent with the intentions of the NPPF, which promotes adequacy of housing land supply year on year. Equally, it is a national priority to maintain, as far as possible, established Green Belts.
4. In all the circumstances, pending formal review of the Local Plan, I consider a small margin only for flexibility is required to ensure the plan remains effective in its delivery of housing land throughout the plan period whilst minimising the chances of disruption to supply during transition to the next. This is achievable without a major review of the Green Belt boundary and the SALDD phasing mechanism, which is locally justified, should enhance the robustness and overall longevity of the plan-led housing land supply, if delivery works out equal to or better than expectations.

5. A small minority of the housing allocations is not justified in the context of the Core Strategy and the NPPF as, for a variety of reasons, the allocations are unsustainably located in principle or in practice, or do not accord with principles underlying effective and positive planning. These allocations should be deleted for soundness.
6. Inevitably, given the tight constraints of the site allocation strategy, this requires compensatory allocation in addition to that required for a small margin of provision for flexibility. This requires clear choices by the Council to identify sustainable replacements and, in practice, the room for manoeuvre is very limited, but it does exist within the purview of options previously considered.
7. Decisive provision of school sites, both primary and secondary, is a major priority if the SALDD is to be considered effective and therefore sound. Appropriate sites exist and have been highlighted during the course of the Examination to date and are adequately evidenced. Froghall Farm is unsuitable for a variety of reasons and should be deleted. Building zones for both primary and secondary provision should be removed from the Green belt as appropriate.
8. In combination with changes previously signalled by the Council, modifying the SALDD in the manner indicated above should lead to a finding of soundness and subsequent adoption of the SALDD.

*Contextual Matters: Duty to Co-operate, Relationship to Core Strategy and NPPF, General approach to Green Belt, Housing Land Supply and Schools Provision*

The Council's 'Local Plan', as now conceived of in the context of national requirements and policy, is effectively a suite of local development documents, of which the SALDD will be an important component. Prior to the introduction of the NPPF, the Core Strategy (CS) was found capable of being made sound in the context of the national policy statements and policy guidance prevailing at the time, together with the now defunct RSS in the form of the East of England Plan. The CS was duly adopted in October 2011. The Development Management Local Development Document (DMLDD) was similarly made sound and adopted, having been independently examined earlier this year, subsequent to the introduction of the NPPF in March 2012 and the Duty to Cooperate previously

introduced with effect from November 2011. The latter is clearly an ongoing obligation, but insofar as site allocations pursuant to the CS may have implications that transcend administrative boundaries and for other statutory agencies, I have no evidence of a failure to co-operate in the sense required, bearing in mind that the Duty is not necessarily a duty to always agree. Much of the evidence base for the SALDD is derived from co-operative working and the tradition is strong in the area. In common with my colleague who examined the DMLDD, I am satisfied that the obligation has been complied with.

The Duty to Co-operate of course continues on a day-to-day basis and will be especially pertinent in the determination of objectively assessed development needs in the Council's area in anticipation of the Review of the Council's Local Plan in due course, which the Council recognises will not only be necessary but could have significant implications for the Green Belt boundary as currently defined and, as you know, the extent to which it should be altered so as to cater for development needs beyond the plan period (i.e. post 2026) remained a live issue at the Hearing Sessions. The previous policy guidance set out in the former PPG2 is reflected as policy in the NPPF insofar as the use of safeguarded land to help facilitate enduring Green Belt boundaries is strongly encouraged.

The Council's cycle of development planning activity was well advanced at the time the NPPF was introduced and its Local Plan therefore sits astride the circumstances prevailing prior to its introduction and those now prevailing. Various views were expressed by participants in the Hearing Sessions as to the implications of this for the SALDD, some more radical than others, and some more pragmatic in tenor than others. Bearing in mind the Council's commendable diligence and very tangible progress in addressing the continuous process of development planning which is required to effectively deliver plan-led sustainable development, and its effective engagement with the local community, I am inclined to the view that the public interest, as reflected in the national intentions of the Framework, is best served by a pragmatic approach appropriate to the local circumstances.

Although, as you know, the SALDD is no longer bound in hierarchical fashion by the provisions of the CS, I consider that the Council's Local Plan as a whole (i.e. the suite of LDDs) should nevertheless be coherent if any particular element is to remain justified within the context that the rest of the Local Plan provides. Hence, in the case of the SALDD, a broad measure of consistency with the CS is required, as I indicated in defining my issues.

Having said that, I use the term 'broad measure of consistency' because I do not consider it necessary for the SALDD to slavishly adhere to the letter of the CS in order for the Local Plan as a whole to remain coherent. The adopted CS is, after all, a land use strategy rather than a rigid blue print and the subsequent introduction of the NPPF and its intentions must also be recognised if the SALDD is to be considered sound, always bearing in mind that the SALDD is but one element of the Council's partially adopted Local Plan and not the whole picture. The key to soundness, as far as the SALDD is concerned, is achieving a balance, where necessary, between the overall thrust of the Council's local planning framework and the NPPF that is appropriate to the local circumstances, without creating fundamental inconsistency with either.

In some circumstances, that might not be achievable, but happily I believe that in the case of Three Rivers it is. While I do not consider the SALDD to be sound as submitted, I consider that, with the changes I consider necessary, which are capable of being addressed through an appropriate set of Main Modifications, it is capable of being made so.

The Ministerial Foreword to the NPPF makes it clear that a significant part of its task is to render that which it replaced concise and accessible. There is therefore significant continuity between the general intentions of the diverse documents which preceded it, and which formed the context for the Council's CS, and those of the NPPF itself. Having said that, it must be recognised that the NPPF introduces changes in emphasis and approach that, where relevant to the content of the SALDD, have to be taken into account if the document is to be considered sound.

Of particular relevance is the presumption in favour of sustainable development, which is as relevant to plan-making as it is to decision-taking in respect of individual planning applications. This requires Local Plans to be sufficiently flexible to adapt to rapid change, albeit not in an unqualified way which would leave important restrictions on development, such as Green Belt designation, vulnerable to being undermined.

A salient theme of the NPPF is to boost significantly the supply of housing and in Three Rivers, which is subject to considerable market pressures for residential development, I see it as of paramount importance that Council can continue to ensure delivery year on year throughout the plan period and into the next, without disruption of the necessary plan-led supply of land for that purpose.

The integrity of the Green Belt is also a matter of national importance. The longstanding advice that Green Belt boundaries may in exceptional circumstances be altered is carried through into the NPPF. Also carried through is endorsement of the principle of creating enduring boundaries through the safeguarding of land for longer term development needs beyond the plan period. Nevertheless, having become familiar with the local circumstances and considered all the evidence and opinions, I am persuaded that the major review of the Green Belt boundary which the Council recognises to be inevitable, if it is to continue to meet its housing needs in the decades ahead, would be premature in the context of the SALDD. To attempt such a review by that route would require an evidence base far beyond that which is currently available as a consequence of current local plan preparation, associated consultation and sustainability appraisal, involving as it has done the serial preparation of the CS, DMLDD and SALDD. It would set back the achievement of a firm and site specific local planning framework in Three Rivers by a number of years, to the detriment of NPPF intentions that planning should be genuinely plan-led so as to deliver sustainable development in the right place at the right time.

Moreover, my working assumption is that the advice currently contained in the web-based National Planning Practice Guidance, that "Plan-makers should not need to rely on windfall allowance in years 6-15" will not be applied retrospectively to plans that have advanced as far as submission. While it is undoubtedly good practice to avoid such uncertainty when local authorities generally have the ability to identify broad locations in years 6-15, there is a risk that, in doing so, the Three Rivers District Council could in practice step beyond a modicum of necessary flexibility so as to initiate a review of the Green Belt that goes beyond the CS intention of minor alteration to it, thereby jeopardising the CS intention to confine such alteration to the periphery of the principal town, key and secondary centres. The Council's approach to windfalls was considered sound at the time of examination and is supported by evidence of delivery. In view of the above considerations, I do not consider a fundamental change in direction or approach is warranted in the SALDD.

Having said that, I am seriously concerned that the SALDD approach of allocating only sufficient land, net of the 190 dwellings assumed to be delivered by the windfall allowance, to numerically meet the residual requirement for circa 1850 dwellings until 2026 introduces a rigidity that renders it hostage to the unexpected non-delivery of even small identified sites, let alone the major contribution assumed from South Oxhey Town Centre and a lesser

contribution from windfalls than anticipated. The SALDD as submitted (with 280 units at South Oxhey Town Centre<sup>2</sup>) identifies land for 1658 dwellings and assumes 190 windfalls. This equates to the residual requirement of 1848 dwellings needed over and above the 2442 dwellings built 2001-213 taken together with the committed dwellings projected to be delivered by April 2014.<sup>3</sup>

I acknowledge that the strength of the market and past performance suggest that all will, in the event, turn out better than planned for in terms of housing delivery, but there is no margin for error or upset, or delay for practical reasons. It is a question of travelling hopefully and with expectation, rather than, in practical terms, creating the virtual certainty that the plan-led system calls for.

Having examined the allocations site by site, and bearing in mind the indicatively phased approach to land release embodied in the SALDD, I do not consider, in the circumstances of Three Rivers that the large margin over and above the planned housing land advocated by some participants is necessary to make the plan positively prepared with sufficient flexibility. However, in view of my concern about rigidity, I am of the view that some margin should be built in to the housing allocations, say 4-5% of the total plan requirement to be delivered, but certainly the equivalent of one year's supply (180 units). In order to be sound, I consider that to be the minimum headroom to ensure delivery of the CS requirements, to avoid potentially harmful disruption to the housing land supply year on year and to facilitate a safe and smooth transition into the beginning of the next plan period (on the assumption that formal adoption of a reviewed local planning framework occurs more or less at that time.) Conversely, if delivery exceeds hope and expectation, the phasing mechanism in the SALDD should ensure that delivery does not run ahead of existing and planned infrastructure capacity and would mean that a larger element of the land identified could be carried over into the next plan period, thereby affording a small measure of relief to the pressures that will undoubtedly be experienced then. That would not be harmful and it is certain that more land will be needed then in any event.

As it is, I have identified a limited number of housing allocations in the submitted SALDD which, having regard to the evidence put to me and all the circumstances, I consider do not sit well with the intentions of the Core Strategy and the interests of sustainable development as articulated in the NPPF, or about which I have

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<sup>2</sup> As opposed to the 378 assumed on the Council's subsequent spreadsheet.

<sup>3</sup> See Council's closing remarks

significant doubts in terms of deliverability or capacity. These are detailed later in this letter to inform the necessary changes I consider necessary in the interests of soundness. The loss of capacity implicit in making such changes must be compensated for, and whilst I acknowledge the Council's desire to retain local choice, the approach adopted to identifying and allocating housing sites (i.e. the very close fit between requirement and allocation) means that, in reality, the room for manoeuvre is extremely limited. However, two significant alternative sites previously considered by the Council have been identified by participants in the Hearing Sessions that I consider would be consistent with the CS intentions and sustainable in NPPF terms and which would not be unduly harmful in terms of Green Belt purposes. There are additional possibilities to make up capacity for soundness and the most obvious one I have identified, a site also previously considered by the Council.

The reliance on South Oxhey Town Centre to deliver at least additional 280 units net of clearance and possibly as many as 360 represents a risk which, on balance, I consider to be justified, subject to the proviso that failure to achieve key milestones should, if necessary, trigger an early review of the SALDD. I have seen no firm evidence that the higher figure now being assumed for design purposes will achieve planning permission, let alone funding, and therefore, in the interests of flexibility and responsiveness, apply a discount equivalent to 50% of the additional capacity now assumed. In other words my working assumption is that the eventual delivery figure could be at least 360 additional dwellings but for robustness and confidence at this stage I am assuming that it will be 320 additional dwellings, an increase on the submitted SALDD of 40 units. Should the regeneration project falter, the Council would need to consider the impact on the projected land supply and take the necessary action. The additional flexibility I consider to be necessary could cater for delay and, in combination with a better performance than anticipated on windfalls, might obviate the need for early review, but this cannot be clear at the present time.

Aside from the above concerns about the housing land supply, I have serious concerns about the submitted approach to school provision, which may be summarised as follows:

- Positive and decisive provision for future school development, including for primary schools, is of the utmost importance to the local community. The SALDD is neither positive nor effective without such provision, the need for which has been well evidenced by the Hertfordshire County Council at the Hearing Sessions.

School provision that comes on stream too late is not characteristic of a sound plan and is harmful to children and families. The certainty of firm allocations is key to minimising the risk of such delay.

- The building zones for schools remain in the Green Belt, giving rise to the contradiction of having to demonstrate very special circumstances for allocated development.
- While the choice of site and disposition of its building zone in the east of the District for a secondary school (i.e. Baldwins Lane) does not compromise soundness, the indecision between the two sites 'allocated' in the west does. It should be one or the other.
- The Council's preference for Froghall Farm, moreover, would compromise soundness because the site is very likely undeliverable within a realistic timescale and would be more harmful to the Green Belt than the Mill End site, which is markedly superior in virtually all respects.
- There is no provision for primary school development despite the demographic situation and the evidence indicates need for new primary school sites in the Rickmansworth and Abbots Langley areas.

These concerns can readily be overcome by; by continuing with the Baldwins Lane allocation as submitted (see detailed housing site comments below); by deleting the Froghall Farm allocation; by expanding, if necessary, the Mill End building zone to allow for an "all through" approach to primary and secondary provision; by allocating land at Woodside Road for a primary school; and by removing all the relevant allocated building zones from the Green Belt. A primary school at Woodside Road could be considered in conjunction with housing development to compensate for lost capacity (see below), an approach which the relevant agencies and the Council might see as advantageous. I would certainly consider it to be a sound approach which would not unduly compromise Green belt purposes. There may be other options to consider, but on the basis of the evidence to date, those I have mentioned seem to me to speak for themselves. Logically, policy SA3 should refer to allocated (as opposed to "identified" sites for new schools. **The SALDD can therefore be modified in respect of its education allocations to make it sound.**

#### *Detailed comments on housing sites*

As far as the housing sites are concerned, there is no evidence to suggest that the Council has fundamentally misjudged the appropriateness, capacity or deliverability of the majority of the housing sites. There is, however, a problematic minority which in

one way or another would compromise the soundness of the plan. There are a number of sites for which I consider the assumed capacity should be reduced (certainly pending detailed design/achievement of planning permission) and which should therefore contribute less to the overall supply; there is one which appears, in view of its history and circumstances, doubtful in practice even though controlled by the Council; and there are some which are inconsistent with the broad thrust of the CS and are of little merit in sustainability terms. These latter sites should be deleted and compensated for by alternative allocations, including from amongst the range that has been put forward by participants in the Examination process. Brief details and summary reasoning are set out below.

Sites to be deleted for soundness	Lost capacity	Total	Summary Reasons
H(1) Adjacent 65 Toms Lane	10		Unsustainable location*
H(2) Land at Three Acres, Toms Lane	20		Unsustainable location*  Adequate vehicular access for significant housing may not be deliverable
H(6) Leavesden Pumping Station	15		Unsustainable location**
H(13) Killingdown Farm Buildings	30		Should not be developed in isolation from immediately surrounding land***
H(17) Branksome Lodge, Loudwater	10		Unsustainable location  Conflict with CS Spatial Strategy
Site H(28) Land South of Tolpits Lane	50	<b>135</b>	Unsustainable location  Green Belt harm  No positive planning rationale
<p>* Further significant piecemeal housing development should not be encouraged east of railway until solution is found to pedestrian access problems to Kings Langley. A more comprehensive approach could be planned for in future. Some scope perhaps for lesser development deemed not inappropriate in a Green Belt through development management processes.</p> <p>**Would result in isolated pocket of housing in Green Belt with poor access. Some scope perhaps for lesser development deemed not inappropriate in a Green Belt through development management processes.</p> <p>*** Poor boundary definition to Green Belt and awkward-to-farm residue of land on removal of farm buildings. Site H085 in SD42 is the basis of a much more satisfactory allocation that could be</p>			

sensitive to both conservation area and access issues.			
Reduced capacity sites	Reduction in capacity or doubtful delivery	Total	
H(3) the Kings Langley employment Area	50		Over-ambitious capacity assumption
H(26) Harefield Road Depot	25 (doubtful delivery)		History of unrealised allocation. Relocation possibilities unproven.
H(33) former Little Furze School	25		Over-ambitious capacity assumption
H(36) the Grapevine Public House	10	<b>110</b>	Over-ambitious capacity assumption
<b>Combined total: Compensatory capacity required</b>		<b>245</b>	

Given the close matching of allocations to requirements, the loss of 245 units of capacity would need to be compensated for directly and a further year's supply is needed for flexibility, as I have pointed out. Thus, even if it is assumed that South Oxhey Town Centre delivers in full the 360 units now hoped for, land for 345 units needs to be identified over and above the soundly allocated sites inclusive of adjusted capacity. This figure is calculated by subtracting the extra 80 units at South Oxhey Town Centre from the 245 units of lost capacity and adding the extra year's supply of 180 units for flexibility ( $245 - 80 + 180 = 345$ ). If, as I consider prudent, a discount of 50% (40 units) is applied to the extra capacity hoped for at South Oxhey Town Centre, the figure increases to 385 units.

While there is little to be gained from excessive fine-tuning in an allocations plan for many years ahead, the essential point is that for soundness, once the sites which should be deleted are deducted from the supply and an appropriate element for flexibility (i.e. one year's supply) is added, land for between 340 and 380 units needs to be identified in the SALDD through modification for a truly robust and therefore effective land supply. It is important to note that this approach retains the assumed windfall element in the last five years of the plan. If that were to be taken out of the equation, land to accommodate a further 190 units would be needed, but I am content in the circumstances that it should be retained.

Moreover, given the indicative approach to phasing/safeguarding derived from policy CP2 of the CS, there seems to me to be no impediment in principle to identifying one or more sites 'post-2026' with a view to bringing them forward if needed or retaining them undeveloped if appropriate to contribute to the next plan period.

The letter of the policy does not look beyond the plan period in that sense, but phasing for orderly release over time is very much in the spirit of the adopted policy and the flexibility to respond to changing circumstances accords with the intentions of the Framework in promoting sustainable development. **Essentially, however, soundness lies in providing, with a small margin for flexibility, a robust supply overall of sustainably located sites.**

A range of alternative/additional sites was canvassed by objectors and those which I conclude should not be considered further for the purposes of the SALDD are detailed in tabular form below.

Sites which would not contribute to soundness	Summary Reasons
Ebury Road, Rickmansworth	Flood risk, access difficulty
Land at Baldwin's Lane, Croxley Green	Needed for secondary school*
Land at East Lane, Bedmond Village	Green Belt and environmental harm Conflict with CS Spatial Strategy
Land north of Little Green Lane, Croxley Green	Green Belt harm Access constraints
Wellcome Trust site, Kings Langley	Unproven ability to adequately resolve pedestrian access problems. Places it in same category as H(1) and H(2) from a sustainability perspective. **
<p>*For site planning and flexibility reasons the building zone for the secondary school S(d) as submitted is appropriate and there is no reason to alter it for soundness. Nor is there any reason to alter the wider allocation boundary for soundness or take land beyond the building zone out of the Green Belt. The Council might wish to consider an element of housing at a future date if less land for education purposes is ultimately needed than currently anticipated, in which case a layout which did not preclude that possibility would be appropriate. But at this juncture it is <u>necessary</u> to maintain the concept as submitted because it would be unsound to constrain the allocation by housing intentions as this would reduce flexibility; and a practical inability to provide adequately for additional secondary education capacity in the east of the district would render the SALDD ineffective and therefore unsound.</p> <p>** Would need to be considered as part of a comprehensive approach to this area.</p>	

The sites which have been suggested by objectors and which I consider could (and should) be added by modification to ensure soundness are those at Woodside Road (H029 in SD42 anticipates combination with primary school development and could be advanced in the context of a comprehensive package of uses as has been suggested) and the reduced site at Fairways Farm (i.e. the site H068 in SD42 corrected to give a capacity of 100 units on 3.3 hectares.) They potentially contribute 100 houses each in sustainable locations in Key Centres. Each site is in the Green Belt at present but could be allocated in a manner which leaves a clearly identifiable distinction between development land and open uses to remain protected as Green Belt. Given that the CS provides for minor revisions to the Green Belt whilst maintaining its general extent, neither site would be unduly harmful to Green Belt purposes if removed from it. Both have been subject to sustainability appraisal.

A further possible contribution to the planned land supply could be achieved by amending the Green Belt boundary opposite Kings Langley Station to expand the mixed use allocation and encompass sites advanced by the Alpine Press and the New Gospel Halls Trust for housing and worship respectively, but the numerical contribution to supply is unlikely to be influential as far as soundness is concerned.

There is also the Killingdown Farm site (H085 in SD42) to consider. It is unsatisfactory in Green Belt boundary terms to confine the allocation to the farm buildings alone, as the SALDD proposes. The residual land south and east of Little Green Lane would be hard to manage productively and could deteriorate. A broader allocation would create the scope for a much better defined Green Belt boundary and, ultimately, a development scheme that is more accessible by foot and sensitive to the conservation area. Some adjustment to the assumed capacity might be considered necessary or desirable but that is essentially a site planning matter. The implied density in H085 (26dph) is not, in principle, too intense. The site is in a Key Centre.

I acknowledge that the Council is anxious to retain choice of housing development sites, but in reality the CS and the subsequent approach to the SALDD limits such choice. In conclusion, however, I have identified scope to delete the allocations which render it unsound whilst substituting allocations which add to soundness by ensuring a robust land supply. Such substitution would, moreover, direct more development to sustainable locations in Key Centres, which are to provide approximately 60% of the District's new housing over the plan period, and would allow revisions to the Green Belt boundary that are effectively minor to reflect the intentions of the CS. The precise percentage of housing to be located in each level of the settlement is less important than the characteristics of individual sites, but there is in any event scope for allocating a higher proportion to secondary centres without significantly distorting the balance sought in the adopted Spatial Strategy. **The SALDD can therefore be modified in respect of its housing allocations to make it sound.**

#### *In conclusion*

The Examination Hearing Sessions covered a range of issues and matters including ones not mentioned above. Those that are mentioned above, including my early concerns regarding the contradiction of allocating sites but retaining them as Green Belt, and the associated necessity to resolve the difficulty at Leavesden Studios, are the ones that the soundness of the SALDD turns on

and, with your general request that I recommend main modifications in mind, I have sought to be as clear as I can in advance of my final report in order that you may take the necessary action in inviting me to recommend specific main modifications to be detailed in an appendix to it.

On balance, given the layers of statutory and policy protection enjoyed by the heritage assets at Langleybury and the Grove and the existence of an adopted brief consistent with the provisions of policy SA7, I do not consider that main modifications pertinent to my fifth issue are required for soundness. Given that the anticipated housing would be confined to that which would be considered not inappropriate within a Green Belt, the comments box in H(10) might be deployed to clarify the point. This is essentially, however, a matter for the Council.

I trust the above is helpful and constructive, as it is intended to be.

Yours sincerely

*Keith Manning*

Inspector