

Robin Brooks BA (Hons) MRTPI
Inspector for Three Rivers District Council's
Development Management Policies LDD
Examination
c/o Ian Kemp, Programme Officer

My Ref : DCES/RM/CM
Your Ref :
Date : 27 March 2013
Contact : Claire May
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Department : Development Plans

Dear Mr Brooks

Treatment of Sites in the Site Allocations LDD in Regards to Green Belt

I write further to your letter and respond to your questions below:

How would the release of the sites be programmed and development proposals resisted until it was considered appropriate for them to be brought forward?

The release of sites will be programmed through the Site Allocations LDD. The housing sites have been allocated phasing dates.

Core Strategy Policy CP2 sets out that the phasing of sites will be reviewed annually as part of the Annual Monitoring Report, taking into account delivery of sites. The housing supply will be monitored to ensure deliverable five year supply of land for housing and for the earlier or later release of Green Belt sites if and when required. This means that if windfall sites are granted planning permission and are delivered, these can be taken account of in assessing the supply of housing and the requirement to release Green Belt sites for development to meet requirements for housing can be reviewed.

Policy SA1 of the Site Allocations LDD states that:

Proposals for development of sites should have regard to the phasing strategy for the site, Core Strategy policy CP2 and the latest monitoring information on housing supply which may result in alteration to the indicative phasing of sites through the Annual Monitoring Report.

There will be occasion where planning applications for sites will be submitted before the phasing dates and development will be considered against the presumption in favour of sustainable development, the development plan and may be resisted on the basis of prematurity where we can demonstrate a five year housing supply.

It is anticipated that windfall sites will continue to come forward and contribute to housing supply. On average approximately 38 dwellings per annum. These windfall sites will be used to reduce the amount of development that will need to take place in the Green Belt.

Other non-housing allocated sites for employment and education are expected to come forward over the plan period and do not have specific phasing. The sites have been allocated specifically to meet identified needs for development over the plan period. These needs will be kept under review through employment land studies and school place planning projections. Therefore it is expected that if, at the time of any planning application there is no longer identified need for the development then very special circumstances will not exist to outweigh the harm to the Green Belt so planning permission would not be granted.

Would the process defer to the future decisions that ought to be taken in principle at the outset?

The decision in principle to develop the Green Belt sites is set out in the Core Strategy's Spatial Strategy. The Site Allocations LDD clearly sets out the proposed sites and indicative phasing of the housing sites to meet currently identified development needs. As stated previously, the phasing of Green Belt sites may be altered through the Annual Monitoring Report depending on how many houses have been built, how we are achieving against the five year supply and the number of windfall sites that come forward.

And if decisions are to be taken on a case by case basis as your note suggests how would consistency of approach be ensured given that what might amount to be very special circumstances could well change markedly over time?

Each development proposal will be assessed against the policies within the Core Strategy, Development Management Policies LDD, Site allocations LDD and the NPPF.

The Site Allocations LDD allocates sites in the Green Belt in order to meet identified needs for development. While other factors may vary over time, the Council would be able to consistently assess whether there is a need for a development at the time of any planning application based on evidence including monitoring data. This assessment would inform whether there would be very special circumstances justifying the release of the Green Belt site for development, and therefore whether permission should be granted. This approach would be applied consistently across the plan period.

I hope the above clarifies the Council's intentions, but if there is any further information required please do not hesitate to contact me.

Yours sincerely,



Claire May MSc MRTPI
Principal Planning Officer