

21 March 2013

Dear Ms May

**Treatment of Sites in the Site Allocations LDD in Regards to Green Belt Policy DM2**

Thank you for your recent note.

Clearly deletion of the last sentence of Policy DM2 under New Buildings, as proposed by PC28 (in the current schedule of changes), effectively severs any direct link between that policy and the forthcoming Site Allocations LDD. As such it takes the question of how sites would developed under that plan outwith the scope of this examination. However, I am seeking to understand the approach the Council are proposing in order that I can properly explain the modification.

Policy CP11 of the CS states that the Site Allocations LDD will make minor revisions to detailed boundaries of Green Belt around the main urban area to accommodate development needs. I had assumed that this meant that boundaries would be re-drawn to exclude identified sites from the Green Belt. That interpretation seems to be supported by the terminology of the Inspector who conducted the CS examination in discussing the housing figures, namely "taking land out of the Green Belt" and "incursions into the Green Belt". However, from what was said at the hearings, and from your note, it appears that the intention is not to make any changes to boundaries apart from in relation to the small areas of existing development referred to in the note. Identified sites would thus presumably remain covered by the Green Belt designation and proposals for their development would be judged against Green Belt policy, under which it would be necessary to show that harm to the Green Belt, and any other harm, would be clearly outweighed by other considerations so as to amount to very special circumstances.

If that is the case a number of questions arise. Are the Council satisfied that this gives sufficient certainty and clarity to the development plan system? How would the release of the sites be programmed; and development proposals resisted until it was considered appropriate for them to be brought forward? Would the process defer to the future decisions that ought to be taken in principle at the outset? 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 very special circumstances could well change markedly over time?

I would be grateful for your clarification on these points and for your confirmation that I have understood the Council's position correctly.

Yours sincerely

*Robin Brooks*