

Three Rivers Site Allocations LDD

EXAMINATION IN PUBLIC

Written Statement On Issue 2: Green Belt

For Gade Investments Ltd

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Prepared by

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1. INTRODUCTION

- 1.1 We act for Gade Investments Ltd and have previously submitted objections that are asking for specific changes to the Three Rivers Site Allocations Local Development Document (SALDD).
- 1.2 Gade Investments Ltd own a key development site at Railway Terrace within the Kings Langley Employment Area proposed for allocation under Policy H(3) of the SALDD. This site is specifically referred to in the Council's letter of 31 July to the Inspector.
- 1.3 Gade Investments Ltd is seeking changes to the SALDD to ensure that it addresses necessary changes to the Green Belt boundary in an appropriate fashion.

2. THE INSPECTOR'S QUESTIONS

Q2.1 - Whether the Council's signalled intentions to now remove most allocated edge of settlement sites from the Green Belt, having regard to the need to deliver housing and other forms of development, are sufficient to accord with the intentions of the Core Strategy in that respect.

- 2.1 We believe the Council's suggested modification is necessary to avoid an unsound Plan; other than in special cases, land cannot simultaneously be allocated for housing and also designated as Green Belt. Housing allocations should be developed within the Plan period and Green Belt is meant to endure beyond the Plan period.
- 2.2 In the case of Policy H3 of the SALDD (Kings Langley Employment Area), which contains the site of interest to our client, we are satisfied with its proposed removal of the Employment Area from the Green Belt. As noted in the Council's letter to the Inspector of 31 July, the Employment Area lies within an existing urban area and is currently in a mix of employment and residential uses. As such it lacks the essential characteristic of openness that is a pre-requisite of Green Belt land.
- 2.3 Our view is that the removal of the allocated site from the Green Belt put forward by the Council in their letters of 31 July and 8 August will be sufficient to deliver sufficient

housing and other development so as to accord with the intentions of the Core Strategy. The only reason for leaving two housing sites in the Green Belt is because the Council believes these particular sites can be developed without needing to delete the Green Belt, presumably because their development would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Assuming this is correct, there is no longer a conflict between Green Belt policy and delivery of housing sites that would undermine the soundness of the Plan.

Q2.4 Whether the proposed phasing of housing land release to delay the development of allocated edge of settlement sites removed from the Green Belt, in deference to sites coming forward within the urban area, is an appropriate response to the intentions of the Core Strategy and the more recent Framework.

- 2.4 The phasing of housing land is an appropriate response to manage the development of allocated sites in the interests of sustainable development. It is a requirement of CP2 of the Core Strategy and the NPPF does not seek to prevent such an approach.

3. CONCLUSION

- 3.1 The Green Belt boundary as shown on the Policies Map is considered unsound because it includes the proposed allocated housing sites of Policy H3. This would require planning applications development of allocated housing sites to address strict Green Belt policy tests. As a result, the Plan is not positively prepared, justified, effective nor consistent with national policy.
- 3.2 The SALDD can be made sound by removing the Green Belt from the proposed allocated housing sites in Policy H3, as shown on the Policies Map. Consequential changes should be made to the text throughout the Plan.