

THREE RIVERS DISTRICT COUNCIL EXAMINATION OF SITE ALLOCATIONS LOCAL DEVELOPMENT DOCUMENT

FURTHER WRITTEN STATEMENT ON BEHALF OF BANNER HOMES LTD

ISSUE 2: WHETHER THE SALDD ADDRESSES NECESSARY CHANGES TO THE GREENBELT BOUNDARY IN AN APPROPRIATE FASHION

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QUESTION 2.1: WHETHER THE COUNCILS 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 INTENTION OF THE CORE STRATEGY IN THAT RESPECT.

- 1.1 The Inspectors Report (August 2011) when commenting upon the submitted Core Strategy DPD referred to a required amendment to Policy CP11 to enable a coherent mechanism for the revision of the Green Belt boundary. The revision was made under change A11 to clarify that any revisions to the boundary of the Green Belt should be identified through the SADPD.
- 1.2 The Core Strategy subsequently confirms that detailed changes to the Green Belt boundary will be made through the allocation of land for development by the Site Allocations Development Plan Document and that this is expected mainly as a result of new housing development on the edge of settlements in accordance with the Spatial Strategy. For reasons set out in response to question 1.3 the proposed allocations within the SALDD do accord with the Spatial Strategy of the Core Strategy.
- 1.3 It is clear from the SHLAA and associated update, that the Council have made every effort to identify potential residential allocation sites within the built up boundaries of existing urban areas. However, it is apparent, and as was always expected by the Core Strategy, that insufficient sites are available within the urban areas to accommodate the necessary housing requirements until 2026.
- 1.4 The Council's decision to remove most edge of settlement allocated sites from the Green Belt, to enable their development is therefore appropriate and necessary. No amendment to this element of the SALDD is necessary.

QUESTION 2.4: 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.

- 1.5 Whilst such phasing of sites is reflective of the intentions of the Core Strategy, it is considered to be in conflict with the more recent Framework.
- 1.6 Whilst much reference is made to the supply of housing within the Framework, including paragraphs 47 – 50 and 156 – 159, no reference is made to the need to restrict or limit the amount, and timing of, such development. Instead, the underlying intention relating to housing within the Framework, as highlighted in the introduction at paragraph 47, is to significantly boost the supply of housing. To attempt to restrict the introduction of identified allocated sites in the Green Belt until after urban areas have been developed, or after a certain time period, or not at all if the Annual Monitoring Report indicates they are not needed to achieve a five year housing land supply, goes completely against the spirit of the Framework.
- 1.7 The great variety of allocated sites and associated specific circumstances relating to them means that the allocations will naturally come forward at different times during the Plan period, and when combined with commercial market awareness, will ensure that there is not any significant oversupply at any time. Those smaller sites without any restraints to delivery, such as H17 (10 dwellings), can come forward at any time during the plan period without any danger of over-supply resulting, rather than being restricted to release from within the rather arbitrary 2016-2020 date, as currently proposed for H17.
- 1.8 It is acknowledged that without the currently proposed phasing strategy within the SALDD some of the Green Belt allocation sites will be likely to come forward at the same time as, or even in advance of, some of the allocated sites within urban areas. However, this would not detract from the principles of sustainable development. Instead it will help ensure that there are sufficient sites coming forward throughout the Plan period and avoid the danger of delays to the urban sites pulling the housing land supply down below the necessary 5 year

requirement, at which point, as advised by paragraph 49 of the Framework, housing supply policies should not be considered up to date.

1.9 Paragraph 154 of the Framework advises that;

"Local plans should set out the opportunities for development and clear policies on what will or will not be permitted and where".

1.10 The introduction of phasing requirements that are susceptible to change every year, based upon the findings of the Annual Monitoring Report, does not provide the level of clarity or certainty which the Framework encourages.

1.11 Given that the phasing approach set out within the Core Strategy, including the attempted delivery of urban sites ahead of Green Belt allocated sites, is not in accordance with the subsequently released Framework, it is considered that the SALDD should not repeat it, and its inclusion of such a phasing strategy is not sound.

1.12 To address the matter Policy SA1 should be amended to remove the 4th paragraph, beginning; *'Proposals for the.....'*; and the specific housing allocations should not include a phasing entry within the table.