Examination of the Three Rivers Core Strategy Development Plan Document
Submission Statement

Matter 3: Green Belt

Prepared by
DLP Planning Ltd
Bedford

May 2011
INTRODUCTION

1. This Submission Statement has been prepared by DLP Planning Ltd on behalf of Taylor Wimpey UK Ltd (Representor ref: 10009) who own land at Woodside Road, Leavesden and Garston.

SUBMISSION

2. The following questions are posed under the Inspector’s ‘Green Belt’ heading:

   (i) Paragraph 5.107 sets out clearly the mechanism for making detailed changes to the established Green Belt boundary through the Site Allocations DPD. Policy CP11 (b) is less clear and relies on cross reference to other parts of the CS. It states that minor revisions will include, where appropriate, removal of sites to be identified through the SADPD. This implies that other revisions are planned. If so how will these revisions be made?

   (ii) Should Policy CP11 provide information about the timing of the GB review?

3. This Submission Statement seeks to respond to these questions as we consider that there will need to be a greater reliance on the release of Green Belt sites than is currently reflected in the Core Strategy. The reasons for this are detailed in our Submission Statement submitted in respect of Matter 2 on Housing Supply and Delivery.

4. The Introduction of PPG2 (1995, amended 2001) makes reference to the general intentions of Green Belt policy, including the contribution this should make to achieving sustainable forms of development. The Introduction also identifies the need to ensure that the long term development needs of an area are met by both allocating and safeguarding land. In paragraph 1.4 reference is made to the fundamental aim of Green Belt policy, this being to prevent the unrestricted sprawl of large built up areas. This paragraph also make reference to the role that Green Belts can play in determining the pattern of urban development, which reflects the over-arching objective at this level to ensure the creation of sustainable patterns of development. In this respect, in reviewing the detailed boundaries of Green Belts, clear regard must be paid to the development needs of the community, in particular their long term
development needs. The review of the Green Belt boundaries is therefore an important exercise.

5. Paragraph 2.6 of PPG2 (1995, amended 2001) confirms that detailed Green Belt boundaries defined in development plans should be altered only exceptionally; they should not be altered or development allowed merely because land has become derelict.

6. Paragraph 2.8 of PPG2 (1995, amended 2001) identifies that it is necessary to establish Green Belt boundaries that will endure. Therefore, these boundaries should be carefully drawn so as not to include land which is unnecessary to keep permanently open as these areas may have to be released in order to accommodate future development. Paragraph 2.8 also identifies that if Green Belt boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that they should have, which would devalue development plans in making proper provision for necessary development in the future.

7. The current Green Belt boundaries for the District are designated in the Three Rivers Local Plan (adopted in 2002). This local plan set the framework for guiding, controlling and facilitating development within the District for the period 1996-2011. The current Green Belt boundaries have now been in place for several years and the time frame for the local plan has almost expired. This identifies that there is an urgent need for review of these boundaries. Paragraph 2.12 of PPG2 (1995, amended 2001) identifies that when local planning authorities prepare new plans any proposals affecting Green Belts should be related to a time scale which is longer than that normally adopted for other aspects of the plan and that they should satisfy themselves that boundaries will not need to be altered at the end of the plan period. If this is in question then this will sometimes mean safeguarding land which may be required to meet longer-term development needs. Paragraph A2 of PPG2 (1995, amended 2001) confirms that the overall aim for land management should be to develop and maintain a positive approach, which makes adequate provision for necessary development and ensures that the Green Belt serves its proper purpose.
8. Appropriately located planned developments may complement and improve local character. Green Belt policy is not an environmental designation and not all Green Belt is of high amenity or recreational value. It is not accepted that the protection of the Green Belt is a sufficient reason for reducing the housing target for the District and a review of the Green Belt to a greater degree to which the Council currently envisions must now be considered when planning for future housing requirements within the District.

9. It is noted that the Council wishes to see previously developed Green Belt sites come forward before greenfield Green Belt sites. However, previously developed sites may not be in locations that are as sustainable in terms of proximity to existing services and facilities as alternative greenfield sites. The maintenance of the Green Belt does not always lead to sustainable settlement patterns and development in Green Belt locations may be much more sustainable in some instances than development in existing urban areas.

10. In light of the above, the Site Allocations Development Plan Document will be an important mechanism in establishing which sites currently within the Green Belt will need to be released in order to deliver the development strategy. It is therefore considered that due to the importance of this exercise this document should be the only mechanism used to make revisions to the Green Belt boundary. Policy CP11 should be reworded to reflect this and to ensure clarity. It should also provide information about the timing of the Green Belt review to offer certainly to developers. These changes will ensure the effectiveness and soundness of the plan.
BEDFORD
DLP Planning Ltd
4 Abbey Court
Fraser Road
Prizzy Business Park
Bedford
MK44 3WH

t 01234 832 740
f 01234 831 286
bedford@dlpconsultants.co.uk

DLP Inskips Design Ltd
8 Goldington Road
Bedford
MK40 3LG

t 01234 261 256
f 01234 347 413
bedford@dlpinskipsdesign.co.uk

BRISTOL
DLP Planning Ltd / DLP Transportation Ltd
2a High Street
Thombury
Bristol
BS35 2AQ

t 01454 410 380
f 01454 410 389
bristol@dlpconsultants.co.uk

CARDIFF
DLP Planning Ltd / DLP Transportation Ltd
13 Cathedral Road
Cardiff
CF11 9HA

t 02920 648 810
f 02920 648 819
cardiff@dlpconsultants.co.uk

READING
DLP Planning Ltd
2 Richfield Place
12 Richfield Avenue
Reading
RG1 8EQ

t 0118 939 1034
f 0118 939 1035
reading@dlpconsultants.co.uk

SHEFFIELD
DLP Planning Ltd
11 Paradise Square
Sheffield
S1 2DE

t 0114 2289 180
f 0114 2725 847
sheffield@dlpconsultants.co.uk