

Three Rivers District Council Site Allocations LDD

Statement in Response to Main Issue 2:

1.0 Whether the SALDD addresses necessary changes to the Green Belt boundary in an appropriate fashion

1.1 QUESTION 2.1

1.2 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.

1.3 Yes. The Spatial Vision (priority j) of The Core Strategy **[SD02]** sets out that there will be limited change to the Green Belt boundary to accommodate some growth involving sustainable development and the Spatial Strategy states that it will be necessary to review the boundaries of the Green Belt at the edge of existing settlements to meet development needs. Policy CP11 of the Core Strategy states that although the general extent of the Green Belt will be maintained, it will be necessary to make minor revisions through the SALDD to the detailed Green Belt boundary. Paragraphs 5.101 – 5.106

1.4 The removal of the Green Belt designation from all the sites proposed for development with the exception of Site H (10), Site H (11) and the indicative 'build areas' of the proposed Secondary Education sites (Site S (a), S(b) and S(d), as outlined in our letters dated 8th August and 31st July 2013 are considered sufficient to accord with the intentions of the Core Strategy.

1.5 The modifications are included in the Schedule of Changes under reference **PC35**.

2.0 Question 2.2

2.1 Whether the SALDD is too tentative in its approach to altering the Green Belt boundary, as has been suggested, or whether the circumstances of Three Rivers justify a cautious approach focused primarily on the plan period itself.

2.2 No, the approach is not too tentative. The circumstances of Three Rivers justify a focused approach to altering the Green Belt boundary to accommodate growth to the end of the plan period. We are in the position of having an adopted up to date Core Strategy which clearly sets out the development needs and for the District up to 2026 and states clearly that only minor changes to the Green Belt boundary would be required.

2.3 As stated in our letter of the 8th August 2013, taking account of our proposed modifications, the revised Green Belt boundary will last until at least 2026 accommodating growth over the short, medium and long term in accordance with the Core Strategy.

2.4 It should also be noted that a Green Belt review was not considered appropriate for the area in relation to the Core Strategy as informed by the Regional Spatial Strategy. We do, however recognise that the Green Belt boundary is likely to be reviewed to accommodate growth for the planning period 2026-2041, subject to the results of joint working with neighbouring authorities pursuant to the duty to cooperate.

- 2.5 As stated in our letter to the Inspector dated 8th August 2013 we are of the opinion that a full review of the Green Belt boundary would be best undertaken as part of the plan preparation for the next planning period at a future date. A review of the Green Belt boundary can then be undertaken in cooperation with neighbouring authorities when the strategic distribution of needed development beyond the plan period can be assessed.

3.0 Question 2.3

3.1 Whether, bearing in mind the context of the Framework, it is necessary to provide for 'safeguarded land' by removing additional land from the Green Belt and, if so, where and how much?

- 3.2 No, we are of the opinion that it is not necessary to provide for 'safeguarded land' by removing additional land from the Green Belt.
- 3.3 The proposed modification to Policy SA1, set out in our letter dated 8th August 2013, will enable any sites that are not required during the plan period to be safeguarded for future development beyond the plan period.
- 3.4 Whilst the NPPF provides this facility it does not require it. It would be premature to 'safeguard' additional land until we know what the development needs are beyond the current plan period. As stated in our response to the previous question, this would be better undertaken as part of the plan preparation for the next planning period.

4.0 Question 2.4

4.1 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.

- 4.2 Yes. The proposed phasing of housing land release was considered as part of the Core Strategy examination. The Core Strategy **[SD02]** Policy CP2 clearly sets out the criteria that will be used to assess proposals for the earlier release of identified edge of settlement sites in the Green Belt.
- 4.3 Following the Council's intentions to remove the Green Belt designation from most of the sites allocated for development we proposed the following additional wording to Policy SA1: Housing Allocations in our letter dated 8th August 2013 following the Inspector's suggestion to consider a specific policy to phase the release of sites removed from the Green Belt that are anticipated to be developed towards the end of the plan period. This modification is included in the Schedule of Changes under reference **PC34**:

The earlier release of identified housing sites will only be considered if:

- i The Annual Monitoring Report projects that there will not be a five year supply of land for housing
- ii The sites can realistically be delivered in the short-term
- iii It can be clearly demonstrated that the early release of sites will achieve significant benefits in terms of sustainability and other objectives of the Core Strategy
- iv It does not unduly impact on other sites coming forward in accordance with the Spatial Strategy

In the case of sites not being required in the Plan period to 2026 sites will be safeguarded for future development beyond the plan period.

5.0 Question 2.5

5.1 Whether it would be necessary and appropriate to remove the indicative build area of the proposed school sites from the Green Belt, bearing in mind the matters referred to under Issue 4 and those recently referred to by the Council.

- 5.2 It is our opinion that it is neither necessary nor appropriate to remove the 'build areas' of the proposed school sites from the Green Belt. Hertfordshire County Council has made representations for an area of 4ha to be removed from the Green Belt designation. As stated in our letter dated 31st July 2013 consideration has been given to this. The 'build areas' detailed in the SALDD are indicative and do not equate to 4ha. Our concern is that if the sites are not required and the land has been removed from the Green Belt, these areas will come under pressure to be developed for other purposes even with the policy that states that they will be reserved for educational use.
- 5.3 Further technical studies or reports undertaken including those required at the planning application stage may determine that the 'build zone' may have to be altered taking account of things such as flooding as stated by the Environment Agency in their representation **(60249/30055/SdC)**.
- 5.3 It may transpire that one or more of the educational sites will not be required. It will be argued by developers that the sites do not enjoy Green Belt protection and should be available for other development, particularly as the Council had already decided to remove the land from the Green Belt to facilitate Educational provision which is no longer proposed.
- 5.4 Following further discussions with Hertfordshire County Council in the completion of the Statement of Common Ground on the Primary and Secondary School Provision, we are firmly of the opinion that it would be premature to remove the Green Belt designation from the secondary school sites via the SALDD.
- 5.5 It might be that a primary and secondary school could be built on one site which would require more or less land depending on design and criteria at the time of development which will also depend on which organisation will be building the school. For example, Hertfordshire County Council have their own build requirements which will be different to that of those required by a Free School. We remain of the opinion that both Primary and Secondary school provision can be achieved through the planning application process.
- 5.6 Paragraph 87, of the NPPF states that development can be approved in the Green Belt in very special circumstances. In principle, development of the allocated sites for educational purposes could represent 'very special circumstances' and therefore removal from the Green Belt is not necessary, particularly as release for Educational purposes is 'signposted' in the SALDD.