

# Part B - Commenting on the Revised Development Strategy

If you are commenting on multiple sections of the document, you will need to complete a separate sheet for each representation

Sheet  of

Which part of the document are you responding to?

REVISED DEVELOPMENT STRATEGY

Paragraph number / Heading / Subheading (if relevant)

R053, R054, R055 + RELATED PARAS

Map (e.g. Proposed Development Sites - District Wide)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (use a separate sheet if necessary).

SEE ATTACHED NOTES SH1

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Ref:

Rep. Ref.



# Note SH1 - Representations relating to RDS3, RDS4 and RDS5 and related paragraphs

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## 1 BACKGROUND

1.1 At first glance, RDS3 takes an approach that protects Green Belt from development.

“RDS3: The Council’s Preferred Option for the broad location of development is to:

- concentrate growth within, and on the edge of, the existing urban areas
- protect the Green Belt from development where alternative non-Green Belt sites are suitable and available
- avoid development in locations which could potentially lead to the coalescence of settlements
- distribute growth across the District, including within and/or on the edge of some villages
- allow for a hierarchy of growth in the rural area to include:
  - a higher level of growth in larger, more sustainable villages with a reasonable level of services
  - limited growth in smaller villages and hamlets, of a scale appropriate to the existing settlement”

1.2 In reality, by deciding, long before the necessary exceptional circumstances have been established, that development should be promoted quite liberally throughout the Green Belt, the Strategy will have quite the opposite effect.

1.3 Paragraph 4.3.16 of the Strategy acknowledges that the exact location of sites to be allocated adjacent to existing villages will need further work but, even before this work has been done, it asserts that some of this land *will* also be allocated within the green belt in many of the targeted villages. The figures backing up this assertion are provided in RDS4 and RDS5:

- RDS 4 identifies that 1000 dwellings will be located in or around the villages
- RDS 5 allocates c600 of these to the Primary Service Villages and c 400 to the Secondary Service Villages.
- No allowance is made for the ‘Other Villages and settlements’.

1.4 At 4.4.2, the Strategy goes even further and states that for the “*washed over villages, revised village envelopes will be established to enable development to take place*” (not ‘*if the necessary exceptional circumstances merit it*’, but ‘*will*’). On the face of it, this will affect:

- Hampton Magna
- Kingswood/Lapworth
- Burton Green
- Hatton Park
- Leek Wootton

1.5 A similar commitment is given in paragraph 4.4.6 in respect of the ‘Other villages and settlements’, which will affect 25 other settlements.

1.6 No comparable commitment to revise settlement boundaries is made for villages that are *not* affected by Green Belt designation. Indeed, paragraph, 4.4.3, states categorically that housing will need, amongst other things, to “*be located within the village envelope;*”

## 2. NATIONAL POLICY FRAMEWORK

2.1 The key elements of the NPPF, for the purposes of this representation, are:

“83 ... Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.



### **3 SUBMISSION**

- 3.1 In our submission, the Strategy will fundamentally conflict with the NPPF's approach since it does not channel development to the type of areas set out in paragraph 84 of the NPPF. On the contrary, it channels over half of the 'village' development toward 'washed over' villages in green belt. It does this:
- Despite accepting that more work needs to be done to assess the capacity of villages to accept development. We submit elsewhere that the assessment of villages that has been carried out so far is flawed in a number of ways, including completely ignoring (in direct conflict with the NPPF) Green Belt as a constraint on development
  - Ignoring the capacity of the 'other villages' to accept development. This is not an insignificant capacity. For example, if each of the 'other' settlements was to receive a single additional dwelling each year (which is perfectly possible), then that could account for almost 400 dwellings over the plan period.
- 3.2 It follows that the location of development in Green Belt has been considered as closer to a first, rather than a last, resort and that the necessary exceptional circumstances have not yet been demonstrated. Recent announcements by the Secretary of State have made it abundantly clear that a simple need for additional housing cannot in itself provide the exceptional circumstances necessary to justify amendments to the Green Belt boundary, and it is very clear that this Strategy takes this approach.
- 3.3 In this case, since the consequence of the local planning authority's policy approach would involve significant intrusions into the green belt around a number of 'washed over' villages, the minimum necessary evidence should be a clear demonstration that it is impossible to meet the housing requirements within or adjacent to existing settlements. By this, we mean the Primary and Secondary Service Villages outside green belt as well as the main urban areas, since all of these have been identified as 'sustainable' locations.
- 3.4 This should be allied to a full green belt review to demonstrate, for example that the extension of 'washed over' villages is a more sustainable approach to the use of Green Belt land.
- 3.5 Until all of these matters are demonstrated, the Strategy is unsound:
- It has not been demonstrated to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It is not, therefore, 'justified'.
  - It does not enable the delivery of sustainable development in accordance with the policies in the Framework – in this case, specifically, sustainable development and Green Belt policies. It is not, therefore, consistent with national policy

### **4 WHAT CAN BE DONE TO RESOLVE THIS OBJECTION?**

- 4.1 The next version of the Strategy should promote a pattern and rate of development that:
- Is based on the *full* objectively assessed needs for market and affordable housing in the housing market area
  - Fully assesses the capacity of locations outside Green Belt to enable the creation of sustainable development towards meeting that need
  - Following a full review of Green Belt, identifies sustainable locations in the green belt sufficient to meet any shortfall in capacity.
- 4.2 In the absence of this, we are instructed to maintain this strong objection throughout the plan process and to seek representation at the subsequent Examination.

**Graham Parker**  
July 2013