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Ryan King

From: Leeming, Paul [REDACTED]
Sent: 21 December 2012 12:37
To: LDF; Helen Gregory
Subject: Selby Local Plan Core Strategy - Proposed Changes No.7
Follow Up Flag: Follow up
Flag Status: Red
Attachments: 16098 191212 GPE HELEN GREGORY PC7.pdf; Reps Set 1.pdf; Reps Set 2.pdf

Dear Mrs Gregory

Following our conversation please find attached representations on behalf of the Grimston Park Estate. There are three pdf files attached a cover letter with all comments and two containing the relevant forms. These have split due to file size.

Yours sincerely

Paul Leeming MRTPI
Senior Associate

For and on behalf of Carter Jonas LLP

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Mrs H Gregory
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19th December 2012

Dear Mrs Gregory

SELBY LDF SUBMISSION CORE STRATEGY SEVENTH SET OF PROPOSED CHANGES

Carter Jonas represents the Grimston Park Estate, a major landowner in the northern part of the District. Representations have been submitted to each stage of the Core Strategy so far and sessions of the Examination have been attended where they affect the Estate's interests.

Comments have been submitted in respect of the Estate's land and property interests around Tadcaster, Ulleskelf and Towton. Those areas remain the key points of interest.

In submitting further comments we have regard to the Inspectors' note as issued on 16th November 2012. Within that note the Inspector recognises that the areas where the need to recommend main modifications *"to achieve a sound plan are relatively few"*. Within those comments the Inspector has helpfully brought a number of issues to the fore in relation to exceptional circumstances for a Green Belt Review, the scale of housing and windfall (particularly calculation of the five year supply plus buffer) rural affordable housing and economic growth.

A number of other matters are covered including changes to the DSV designations and the Duty to Cooperate. On the latter issue it is clearly correct that detailed consideration must await the various legal submissions which are anticipated early in the New Year.

NPPF requires that at para 182 that

"The Local Plan will be examined by an independent inspector whose role is to assess whether it is sound..... namely that it is:

- **Positively prepared** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet*

requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Turning to the Proposed Changes No.7 we consider these in detail below. A copy of the necessary forms (where we consider the changes or the policy and justification to be unsound and a further change or reversion required) is attached to this correspondence:

PC7.1: Para 4.9

The clarification is broadly supported as stated. However, we would suggest that the three main towns (Selby, Tadcaster and Sherburn) are set identified in the paragraph for the avoidance of doubt.

PC7.2 Para 4.39 CPXX Supporting Text

Within this broad set of proposed changes, amendments are included to reflect the wording and intent of NPPF to substantially increase the delivery of housing and promote sustainable patterns of development (Para 84).

NPPF at Para 83 suggests that Green Belt remains an important tool alongside settlement policy. It continues that Green Belt boundaries should be drawn up with regard to their intended permanence and to endure beyond the plan period (i.e. beyond 2027 or later). Boundaries should only be reviewed in exceptional circumstances through the preparation or review of a Local Plan. Para 85 sets out the considerations for defining boundaries, using recognisable features and ensuring that areas of safeguarded land are identified to meet the longer term needs beyond the plan period.

This latter issue does not appear to be explicit within the justification particularly para 4.39g . In order to address these matters we would suggest that proposed paragraph 4.39g should have the additional words inserted:

"[patterns of development] and to accommodate the longer term development needs beyond the plan period".

Paragraph 4.39h seeks to protect the settlement hierarchy and suggests that this is the most appropriate mechanism for delivering housing in sustainable locations. Changes introduced through PC7.2 remove reference to the "meet their own needs", to one of provide for an "appropriate level of growth." This change is supported as it moves away from the simplistic distributional approach based upon housing need, advocated in the (post submission) changes to Policy CP2.

Where we would then diverge from the Council's position is that the Submission Core Strategy includes an equal distribution of housing between both Tadcaster and Sherburn in Elmet of the District's housing provision at 9% each. A variation was produced in subsequent Proposed Changes to reduce Tadcaster's proportion (by 2%) and a similar hike in Sherburn's; providing a

differential of Sherburn 11% and Tadcaster 7%. This change was predicated on the case for housing need,; we no longer consider that policy approach to be justified and it is therefore unsound. .

To resolve this concern we consider that now the housing need element is replaced by a wider "basket" of sustainability measures we would suggest that the proportions revert back to those set out in the Submission Core Strategy.

Paragraph 4.39j sets out what the Council considers to be the exceptional circumstances to justify a Green Belt Review through the Local Plan process. In broad terms, it suggests that where non-Green Belt land around higher order and selected settlements is not available the Council will need to review the Green Belt to deliver development in sustainable locations. This approach is sensible and therefore supported.

We would suggest that the phraseology in para 4.39j in relation to identifying areas of safeguarded land should be changed from "may" to "will". NPPF advocates that considering the potential for safeguarded land is a pragmatic requirement in identifying and defining Green Belt boundaries; not an optional exercise as the current wording suggests.

Paragraph 4.39oo suggests what the Green Belt review will do. In light of our comments above, we would suggest that the word "and" is inserted between the third and fourth bullet points. In our view this improves the legibility of the paragraph.

PC7.3 Amended CPXX policy Text

A number of amendments are proposed to Policy CPXX within PC7.3. The intent of these changes is broadly supported. We would suggest however, that the policy should be more definitive and allows for the review of Green Belt boundaries to exclude land which no longer performs a Green Belt function, consistent with the provisions of the NPPF.

In our view the revised CPXX does not provide a policy "hook" for the Green Belt Review and is therefore unsound. We would suggest that the beginning of provision C is reworded as follows:

"A comprehensive review of Green Belt boundaries will be undertaken through the Local Plan. Boundaries will only be altered in exceptional circumstances. Such [exceptional circumstances may exist where:]"

To deal with the second point, we would suggest that a fourth criterion is added which deals more prosaically where a Green Belt designation is anomalous or no longer required, or where land is no longer considered to serve a Green Belt function.

*"[(iii) land], or
iv) in localised areas the Green Belt designation is anomalous, or the land is not considered to serve a Green Belt function due to incremental changes in land use around it."*

PC7.4 Para 4.29

Makes reference to the Development Limits which are to be defined as part of the Policies Map; we have no comments upon this change.

PC 7.5 Amended para 4.29 (Well designed new buildings)(

We have no comment about this particular change.

PC 7.6 Policy CP1 Part A (a)

We have no comment about this particular change.

PC7.7 CP1 Part A (a) Fairburn status

We have no comment about this particular change.

PC7.8 CP1 Part A (b) Development Limits

We have no comment about this particular change.

PC7.9 CP1 Part A (c) Development in the Countryside

We have no comment about this particular change.

PC7.10 CP1A Para 4.47

We would suggest that the word "liner" be replaced with "*linear*"; the statement would then make sense.

PC7.11 CP1A

Minor changes to the wording of the policy are proposed. These add to the clarity and legibility of the policy; we have no comment on these minor wording changes.

PC7.12 CP2 Paras 5.28 Onwards

We assume that the heading block for this proposed change includes the section from paragraph 5.25 onwards (as changes to this paragraph do not appear to be referred to elsewhere); otherwise the Proposed Changes are not complete or coherent.

Paragraph 5.27 as drafted following the current set of Proposed Changes is factually incorrect and is therefore unsound.. The Core Strategy will not be adopted until 2013. We would suggest therefore that PC5.22 and 5.23 be deleted and updated to reflect the actual likely adoption date and a 15 year end point identified there from, i.e. 2028.

An approach which accepts windfall sites as a "bonus" rather than as an integral part of the "planned for" housing supply is supported. Taking the estimate that the Council anticipates that a lean year will produce around 100 dwellings from windfall sites we are satisfied that the Council is seeking to support an annualised housing figure of **at least** 550 units per year.

PC7.13 CP2 Windfall Footnote

If however, the Council is maintaining the current proposed end date of 2027, we would query the mathematics in the current Provision B: 7,200 – 1820 is 5,380; not 5,340. It would be appropriate for the target to be rounded up to 5,400 and set as a minimum target. It should read:

" Taking into account current commitments, housing land allocations will be required to provide for a minimum target of 5,400 dwellings for the period to 2027, as follows:

We would suggest that Column 6 of the subsequent be labelled ***“Minimum New Allocations needed”***. To accommodate the changes in the numbers we would suggest that the figure for Tadcaster should be rounded up to 400, and to 1,800 for the DSVs. (Subject to our comments on PC 7.2, 7.17 and 7.19).

PC7.14 CP2 Clarification

This clarification is supported and reflects comments made to the previous set of Proposed Changes (No 6).

PC7.15 CP2 Phasing

This proposed change seeks to delete parts of the policy on phasing. Confirmation of this change (PC6.40) is supported.

PC7.16 Para 5.44c-f Deletion

These changes seek to correct duplication in the supporting text which refers to the use of PDL targets. Such targets are no longer supported by national policy, so their removal is consistent with NPPF.

PC7.17 CP3 Para 5.55a (new 5.52) and PC7.19 CP3 Para 5.55e

Comments in relation to these changes replicate the matters set out above in relation to PC 7.2 where it refers to “appropriate levels of growth” and consequential reversion to the Core Strategy CP2 distribution.

PC7.18 CP3 Para 5.55d Plan Review

This proposed change is supported as the text is superseded by changes elsewhere at Policy CP3.

PC7.20 CP3 Part B (plus consequential text changes 5.44b, h, m, n and o)

Changes are imposed here to ensure consistency with the NPPF. These changes to the text and policy are supported.

PC7.21 CP5

We have no comment upon this particular change to the policy.

PC7.22 CP6 “Exceptions” sites

Changes are proposed to enable market housing to be progressed where this will enable the delivery of affordable and local needs housing where grant funding allocation may not be available to cover the cost.

PC7.23 CP9

Several changes are proposed to Policy CP9 to ensure consistency with NPPF. We have no comment upon these changes.

PC7.24 CP12 and PC7.25 CP 12 Criterion b

Both of these changes comprise minor wording changes to ensure consistency with the NPPF and clarity within the policy. We have no comments to make at this time.

PC7.26 (CP14) Para 7.53, PC 7.27 CP14 Policy and PC7.28 CP14

These changes seek to more closely reflect the wording within the NPPF. We have no comments at this time.

Conclusions

The seventh set of Proposed Changes are broadly welcomed as they more accurately reflect the contents of the NPPF. We would remain of the view that the cumulative effect of all of the Proposed Changes over the previous 18 months do not substantively change the Core Strategy as submitted, but merely seek to clarify the policy and justification and to bring the contents of the document in to line with the prevailing planning policy.

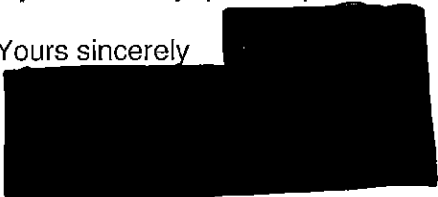
A number of concerns remain; in particular we are of the view that the Core Strategy should seek to deliver a minimum of 550 dwellings per annum over the Core Strategy period and this should be stated explicitly in Policy CP2. It is welcomed that the Council acknowledges that at least 550 dwellings should be delivered; however, this relies upon a balance of provision from as yet unknown "windfall" sites. By their very nature these cannot be predicted, as a consequence it would be prudent for the Council to ensure that sufficient land is identified and made available and that any windfall allowance should be a "bonus" not to be relied upon.

Some of the changes relating to Tadcaster suggest that it should seek to accommodate an "appropriate level of growth". A move away from a simplistic approach based upon an accumulation of the housing need of the northern sub-area is welcomed where this is instead determined by a wider basket of sustainability measures. In our view, mindful that both Sherburn and Tadcaster are Local Service Centres the housing distribution should revert to that set out in the Submission version of CP2 of 9% of the housing requirement each.

As it is we consider that there are a number of minor amendments required to Policy CP2 and the housing numbers contained within it. Should delivery of the housing numbers require a review of the Green Belt and the exceptional circumstances can be demonstrated, we have suggested a number of minor changes to Policy CPXX and the justification which we consider provides a more definitive policy stance as well as a consistent approach to the identification of safeguarded land.

If you have any queries, please do not hesitate to contact me.

Yours sincerely


Paul Leeming BA (Hons) BTP MRTPI
Senior Associate
For and on behalf of Carter Jonas LLP
Encl

Part B (please use a separate sheet (pages 3-4) for each representation)

Please identify the Proposed Change (which can be found on the Published Schedule, CD2g) to which this representation refers to:

PC 7.12 Policy CP2 Justification

Question 1: Do you consider the Proposed Change is:

1.1 Legally compliant Yes No

1.2 Sound Yes No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the Proposed Change is unsound, please identify which test of soundness your representation relates to:

- 2.1 Positively Prepared (Please identify just one test for this representation)
- 2.2 Justified
- 2.3 Effective
- 2.4 Consistent with national policy

Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.

We assume that the heading block for this proposed change includes the section from paragraph 5.25 onwards (as changes to this paragraph do not appear to be referred to elsewhere); otherwise the Proposed Changes are not complete or coherent.

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PLEASE ALSO SEE THE COVERING LETTER WHICH ACCOMPANIES THESE COMMENTS ALONG WITH OTHER REPRESENTATIONS.

Question 3 continued

(Continue on a separate sheet if submitting a hard copy)

Question 4: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?

4.1 Written Representations

4.2 Attend Examination

- 4.3** If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary
(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

Grimston Park Estate is a major landowner with business and property interests in the North of the District. The matters raised through these Proposed Changes directly affect the interest of the Estate. As a consequence it is important to attend the hearings to listen and contribute to the debate as appropriate.

(Continue on a separate sheet if submitting a hard copy)

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation. I understand that my name (and organisation where applicable) and representation will be made publically available (including on the Council's website) in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

Signed PAUL LEEMING

Dated 21/12/12

**Selby District Submission Draft Core Strategy
Consultation on Further Proposed Changes (7th Set)
November 2012
Representation Form**

The Core Strategy has been subject to Examination by an independent Inspector at hearings in September 2011, April 2012 and September 2012.

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Representations are therefore invited as part of this consultation on the 7th Set of Proposed Changes to the Submission Draft Core Strategy and the Further Sustainability Appraisal Addendum Report.

Please complete separate copies of Part B of this form for each of your separate representations. It would be helpful if you could focus on the "tests of soundness" and indicate if you are objecting on a legal compliance issue.

**Completed representation forms must be returned to the
Council no later than 5pm on Friday 28 December 2012**

Email to: ldf@selby.gov.uk

Fax to: 01757 292229

**Post to: Policy & Strategy Team, Selby District Council, Civic Centre,
Doncaster Road, Selby YO8 9FT**

Part A

The Tests of Soundness

The Independent Inspector's role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The tests to consider whether the plan is 'sound' are explained under paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012) and states a sound Core Strategy should be:

Positively prepared

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Justified

- the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective

- the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

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Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
Name		PAUL LEEMING
Organisation	THE GRIMSTON PARK ESTATE	CARTER JONAS LLP
Address		REGENT HOUSE 13 - 15 ALBERT STREET HARROGATE HG1 1JX
Telephone No.		
Email address		

It will be helpful if you can provide an email address so we can contact you electronically.

You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 3-4) to this part of the representation form.

Part B (please use a separate sheet (pages 3-4) for each representation)

Please identify the Proposed Change (which can be found on the Published Schedule, CD2g) to which this representation refers to:

PC 7.13 Policy CP2 Windfall footnote and Policy Text

Question 1: Do you consider the Proposed Change is:

1.1 Legally compliant Yes No

1.2 Sound Yes No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the Proposed Change is unsound, please identify which test of soundness your representation relates to:

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CP2 Footnote 6 seeks to clarify the provision from planned for sites (target completions) and an anticipation of completions from windfall sites. This clarification is welcomed.

In light of the amended position on windfalls however, we would query the situation if windfall sites fail to deliver the number of dwellings anticipated. As drafted we consider that the policy is unsound as it is not effective. We would suggest that the Policy CP2 wording should be amended to carry the figures through to a policy hook.

Consistent with our previous representations we would suggest that an additional provision should be included:

"A minimum of 550 dwellings per annum will be delivered during the Core Strategy period."

Subsequent provisions should be renumbered. In line with our previous representations the numbers should be amended to take into account a 15 year end date of 2028.

Question 3 continued

PLEASE ALSO SEE THE COVERING LETTER WHICH ACCOMPANIES THESE COMMENTS ALONG WITH OTHER REPRESENTATIONS.

(Continue on a separate sheet if submitting a hard copy)

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4.2 Attend Examination

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Such matters have been dealt with through earlier representations.

Question 3 continued

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- the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy

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Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

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Name	<input type="text"/>	PAUL LEEMING
Organisation	THE GRIMSTON PARK ESTATE	CARTER JONAS LLP
Address	<input type="text"/>	REGENT HOUSE 13 - 15 ALBERT STREET HARROGATE HG1 1JX
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Part B (please use a separate sheet (pages 3-4) for each representation)

Please identify the Proposed Change (which can be found on the Published Schedule, CD2g) to which this representation refers to:

PC 7.2 Para 4.39 Supporting Text for CPXX

Question 1: Do you consider the Proposed Change is:

- 1.1 Legally compliant Yes No
- 1.2 Sound Yes No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the Proposed Change is unsound, please identify which test of soundness your representation relates to:

- 2.1 Positively Prepared (Please identify just one test for this representation)
- 2.2 Justified
- 2.3 Effective
- 2.4 Consistent with national policy

Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.

Within this broad set of proposed changes, amendments are included to reflect the wording and intent of NPPF to substantially increase the delivery of housing and promote sustainable patterns of development (Para 84).

NPPF at Para 83 suggests that Green Belt remains an important tool alongside settlement policy. It continues that Green Belt boundaries should be drawn up with regard to their intended permanence and to endure beyond the plan period (i.e. beyond 2027 or later). Boundaries should only be reviewed in exceptional circumstances through the preparation or review of a Local Plan. Para 85 sets out the considerations for defining boundaries, using recognisable features and ensuring that areas of safeguarded land are identified to meet the longer term needs beyond the plan period.

This latter issue does not appear to be explicit within the justification particularly para 4.39g. In order to address these matters we would suggest that proposed paragraph 4.39g should have the additional words inserted:

"[patterns of development] and to accommodate the longer term development needs beyond the plan period".

Paragraph 4.39h seeks to protect the settlement hierarchy and suggests that this is the most appropriate mechanism for delivering housing in sustainable locations. Changes introduced through PC7.2 remove reference to the "meet their own needs", to one of provide for an "appropriate level of growth." This change is supported as it moves away from the simplistic distributional approach based upon housing need, advocated in the (post submission) changes to Policy CP2.

Where we would then diverge from the Council's position is that the Submission Core Strategy includes an equal distribution of housing between both Tadcaster and Sherburn in Elmet of the District's housing provision at 9% each. A variation was produced in subsequent Proposed Changes to reduce Tadcaster's proportion (by 2%) and a similar hike in Sherburn's; providing a differential of Sherburn 11% and Tadcaster 7%. This change was predicated on the case for housing need; we no longer consider that policy approach to be justified and it is therefore unsound.

Question 3 continued

To resolve this concern we consider that now the housing need element is replaced by a wider "basket" of sustainability measures we would suggest that the proportions revert back to those set out in the Submission Core Strategy.

Paragraph 4.39j sets out what the Council considers to be the exceptional circumstances to justify a Green Belt Review through the Local Plan process. In broad terms, it suggests that where non-Green Belt land around higher order and selected settlements is not available the Council will need to review the Green Belt to deliver development in sustainable locations. This approach is sensible and therefore supported.

We would suggest that the phraseology in para 4.39j in relation to identifying areas of safeguarded land should be changed from "may" to "will". NPPF advocates that considering the potential for safeguarded land is a pragmatic requirement in identifying and defining Green Belt boundaries; not an optional exercise as the current wording suggests.

Paragraph 4.39oo suggests what the Green Belt review will do. In light of our comments above, we would suggest that the word "and" is inserted between the third and fourth bullet points. In our view this improves the legibility of the paragraph.

PLEASE ALSO SEE THE COVERING LETTER WHICH ACCOMPANIES THESE COMMENTS ALONG WITH OTHER REPRESENTATIONS.

(Continue on a separate sheet if submitting a hard copy)

Question 4: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?

4.1 Written Representations **4.2 Attend Examination**

4.3 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary
(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

Grimston Park Estate is a major landowner with business and property interests in the North of the District. The matters raised through these Proposed Changes directly affect the interest of the Estate. As a consequence it is important to attend the hearings to listen and contribute to the debate as appropriate.

(Continue on a separate sheet if submitting a hard copy)

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation. I understand that my name (and organisation where applicable) and representation will be made publically available (including on the Council's website) in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

Signed PAUL LEEMING 

Dated 21/12/12

**Selby District Submission Draft Core Strategy
Consultation on Further Proposed Changes (7th Set)
November 2012
Representation Form**

The Core Strategy has been subject to Examination by an independent Inspector at hearings in September 2011, April 2012 and September 2012.

The independent Inspector adjourned the Examination in Public (EIP) until 27 February 2013 in order for the Council to consult on any further Proposed Changes to the Submission Draft Core Strategy in accordance with the revised timetable (available at www.selby.gov.uk/CoreStrategyEIP).

The Council is therefore publishing further Proposed Changes to the Submission Draft Core Strategy, for consultation between 12 November and 28 December 2012.

The Submission Draft of the Core Strategy (May 2011) takes into account views gathered at the previous stages of consultation. The September 2011, April 2012 and September 2012 EIPs have already heard the duly made representations on the Submission Draft Core Strategy which were submitted during the formal Publication stage (January 2011) and subsequent consultation on the previous 6 sets of Proposed Changes (January and June 2012). This is not another opportunity to make further representations on those matters.

Representations are therefore invited as part of this consultation on the 7th Set of Proposed Changes to the Submission Draft Core Strategy and the Further Sustainability Appraisal Addendum Report.

Please complete separate copies of Part B of this form for each of your separate representations. It would be helpful if you could focus on the "tests of soundness" and indicate if you are objecting on a legal compliance issue.

Completed representation forms must be returned to the Council no later than 5pm on Friday 28 December 2012

Email to: ldf@selby.gov.uk

Fax to: 01757 292229

**Post to: Policy & Strategy Team, Selby District Council, Civic Centre,
Doncaster Road, Selby YO8 9FT**

Part A

The Tests of Soundness

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Part B (please use a separate sheet (pages 3-4) for each representation)

Please identify the Proposed Change (which can be found on the Published Schedule, CD2g) to which this representation refers to:

PC 7.3 Policy CPXX

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- 1.2 Sound Yes No

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A number of amendments are proposed to Policy CPXX within PC7.3. The intent of these changes is broadly supported. We would suggest however, that the policy should be more definitive and allows for the review of Green Belt boundaries to exclude land which no longer performs a Green Belt function, consistent with the provisions of the NPPF.

In our view the revised CPXX does not provide a policy "hook" for the Green Belt Review and is therefore unsound. We would suggest that the beginning of provision C is reworded as follows:

"A comprehensive review of Green Belt boundaries will be undertaken through the Local Plan. Boundaries will only be altered in exceptional circumstances. Such [exceptional circumstances may exist where:]"

To deal with the second point, we would suggest that a fourth criterion is added which deals more prosaically where a Green Belt designation is anomalous or no longer required, or where land is no longer considered to serve a Green Belt function.

"(iii) land], or

iv) in localised areas the Green Belt designation is anomalous, or the land is not considered to serve a Green Belt function due to incremental changes in land use around it."

PLEASE ALSO SEE THE COVERING LETTER WHICH ACCOMPANIES THESE COMMENTS ALONG WITH OTHER REPRESENTATIONS.

Question 3 continued

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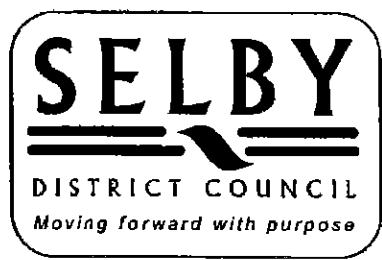
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