

CD11/

South Bucks District Council

Supplementary Statement in Response to the Written Statement from Consortium of landowners (South of Farnham Royal)

1. This brief statement is in response to the final Written Statement (November 2010) from Barton Willmore, representing the Consortium of landowners who have interests in land to the south of Farnham Royal.

Interpretation of the revised definition of Previously Developed Land

2. In paragraph 1.6 of Barton Willmore's final Statement, it is argued that the Council's interpretation of the revised PPS3 definition for PDL "*does not adequately capture the revision to the definition*".
3. As stated in CD1/34 (paragraph 3.2), DCLG have issued no guidance on how to define PDL beyond what is in PPS3, and advised that the Council should make its own decision based on the circumstances of the particular case. The Council will take a pragmatic approach to the definition of PDL quoted in paragraph 1.5 of Barton Willmore's final Statement. With regard to the example given in the following paragraph (a site that involved the demolition of one house to provide access for the redevelopment of an area of land made up of back gardens from adjoining dwellings), this would be classed as greenfield development, as the development (i.e. new dwellings) would not be on any part of the footprint of the house that was demolished.
4. Notwithstanding this, it should be stressed that the definition of PDL bears no direct relationship with the strategy for delivering housing in the District. Appropriate schemes involving back garden land will continue to come forward and be granted planning permission - albeit that in the Annual Monitoring Report, some of the sites will be classified as greenfield development.

Perception of the revised definition of PDL

5. All members have access to the Planning Committee Papers, and regularly review, given their local interest in individual schemes. Furthermore, there is a regular dialogue between Members (and Officers) and should concerns be raised on back garden land development, by a Member not on the Planning Committee, they have (and will be) referred to the relevant Report.

Densities

6. As stated at the hearing sessions, the Council has monitored housing densities from new permissions granted over a number of years in the District. Appendix 1 in CD11/10 sets out the development density figures for residential planning permissions granted between April 2005 and March 2009. This provides a better indication of long term trends rather than the single monitoring year's data provided by Barton Willmore in paragraph 1.8.
7. It should be noted that the former version of PPS3 included a figure of 30 dwellings per hectare as a "national indicative minimum to guide policy development and decision making until local density policies are in place". It was never a firm "requirement" that development should not be built below this figure, as suggested by Barton Willmore in paragraph 1.9.

CD11/22 Sustainability Appraisal - Sites

8. CD11/22 addresses the Council's approach to sustainability appraisal. Prior to the start of the Core Strategy Examination (where there was some brief discussion on the Council's Sustainability Appraisal work) no representors raised any specific issues with the approach the Council had adopted in its Sustainability Appraisal work.
9. The Council maintains that the Sustainability Appraisal work undertaken in support of the Core Strategy is robust, and appropriate in scope and detail.
10. The Core Strategy Emerging Approach document (CD1/32) and related Sustainability Appraisal work (CD1/16) considered a range of reasonable alternatives. These broad options were appropriate for the appraisal of a Core Strategy, and gave consideration to the release of Green Belt land for development, adjacent to the Principal Settlements, Smaller Settlements, and Settlements near and adjacent to Slough. All reasonable alternatives were considered, at a level appropriate to preparation of the Core Strategy.
11. There is no requirement (or need) to appraise every single parcel of land in the District, before settling on the most appropriate Spatial Strategy. This is particularly the case, where there are no exceptional circumstances warranting a review of the Green Belt boundary (as is the case in South Bucks).

Housing Land Supply

12. Barton Willmore has misunderstood the figures available to the Council, at the time when it was decided not to pursue the idea of 'contingency locations'.

13. The Core Strategy Emerging Approach document (CD1/32) summarises the housing land supply position at 1st April 2008 (table under paragraph 2.176, page 41). Completions, under construction and outstanding planning permissions (with a 5% non-implementation allowance) totalled 1,272 dwellings. At that date, the Council needed to identify land for over 600 new dwellings, to meet the South East Plan requirement of 1,880 units (2006-2026). The yield from SHLAA sites (assumed at the time to be 300 units) along with the Strategic Sites (now termed Opportunity Sites) showed a potential dwelling delivery range of 1,872-1,972.
14. This was only just above the South East Plan requirement, and there was uncertainty over the availability of Wilton Park. This provides the context for consideration of the identification of contingency locations.
15. By Summer 2009, the Council had available another year of monitoring data (2008/09). Perhaps most importantly, this showed a significant strengthening in the number of dwellings completed, under construction and with outstanding planning permission (with a 5% non implementation allowance) - 1,720 units. Just three years into the Plan period, the Council effectively needed to identify sufficient land for just 160 units (to meet the South East Plan housing requirement).
16. CD1/36 shows the housing position in South Bucks has strengthened still further.
17. The comparison made by Barton Willmore (in paragraph 2.6 of their final Statement) is misleading. The figures for March 2009 include a 5% non implementation allowance, and provision for development on the Strategic Sites (now termed Opportunity Sites). The figure for April 2010, is a 'worst case scenario' figure - with a 10% non-implementation allowance, the sensitivity testing development densities applied to the SHLAA sites, and no allowance is made for development on the Opportunity Sites.