

## Previously Developed Land Target following changes to PPS3: Housing

### 1. Introduction

1.1 On 9 June 2010, the Government issued an updated version of Planning Policy Statement 3: Housing (referred to hereinafter as 'PPS3') with two changes as follow:

- Private residential gardens are now excluded from the definition of previously developed land (refer Annex B), and
- The national indicative minimum density of 30 dwellings per hectare has been deleted (refer paragraph 47)

1.2 The requirement for Local Development Documents to include a local previously developed land (PDL) target and trajectory remains (PPS3, paragraph 43).

### 2. South Bucks Core Strategy

2.1 Core Policy 1 in the Proposed Submission Core Strategy (published March 2010) proposed a PDL target of at least 95% for South Bucks, in the period 2006-26.

2.2 When submitting the Core Strategy for Examination (July 2010), the Council noted in its Schedule of Proposed Changes (CD1/02), that the PDL target in Core Policy 1 would need to be reviewed, to reflect the recent revision to PPS3. A further Core Document (CD1/33, Background Paper on Changes to PPS3 and Revocation of the South East Plan) explored the implications of alternative options for calculating a PDL target, but deferred any decision on the matter, until further guidance was made available on the practical implementation of revised PPS3.

2.3 The Council subsequently committed to tabling an amended PDL target at the Pre-Hearing Meeting.

### 3. Practical Issues

3.1 The new definition of PDL in PPS3 could have a profound impact on the percentage of housing development in South Bucks on PDL. This is because a large proportion of completions since 2006, outstanding permissions, and most of the suitable SHLAA sites involve development either wholly or partly on private residential garden land. In particular, the majority of housing development in South Bucks involves the demolition of a dwelling (or several dwellings) and their replacement with a scheme involving development partly on the footprint of the old properties, and partly on the former private residential garden land.

3.2 Following the change of the PDL definition, the Council wrote to DCLG seeking advice and clarification on this matter. The advice given was that Local Planning Authorities should take a pragmatic approach to record

past completions and permissions that were considered as PDL at that time as PDL and any permissions or completions on gardens since policy changes not as PDL. No particular definition was given on plot redevelopment involving some back garden land and the Local Planning Authority is advised to make its own decision based on the facts and circumstances of the particular case.

3.3 It is unclear whether this kind of redevelopment should be regarded as PDL or Greenfield development. The difficulty facing the Council is that whilst it understands that the PDL target for South Bucks will need to be lowered, in the absence of any further guidance at the national level, the basis for the calculation of a new target is unclear.

3.4 As a result, the Council proposed a change to the PDL target when submitting its Core Strategy to the Secretary of State in July 2010. The Council explored the implications of alternative options for calculating a PDL target in the Background Paper on Changes to PPS3 and Revocation of the South East Plan (CD1/33). However, with no details provided on how the change of PDL definition is to be interpreted in practice, the Council was unable to propose a replacement PDL target when the Core Strategy was submitted and this was explained in the Schedule of Proposed Changes (CD 1/02). The Inspector acknowledged the Council's note and accepted that a new PDL target will be provided by the time of the Pre-Hearing Meeting.

#### 4. New PDL Target

4.1 A new PDL target for the Core Strategy has therefore been calculated based on the following assumptions:

- The PDL new definition will only apply to sites completed on or after April 2010. The previous PDL definition (where residential back garden land was classified as PDL) will apply on all completions on or before 31 March 2010 (Monitoring year 2009/10).
- Housing development that involves the demolition of an existing dwelling (or several dwellings) and their replacement with a scheme involving development partly on the footprint of the old properties, and partly on the former private residential garden land will be regarded as PDL development. In other words, only new housing developed solely on residential back garden land will be counted as greenfield development.

4.2 All the housing sites with outstanding planning permissions and sites identified in the Strategic Housing Land Availability Assessment have been assessed against the PDL assumptions set out above. Based on the findings of the assessment, the Council is proposing, in its Schedule of Further Proposed Changes, that the PDL target in the Core Strategy be 80%, which is considered appropriate and achievable.