

Our Ref: SP/JVW/F00126
Tel No: 01277 260000 Ext 457
E-mail: steve.price@cpplc.com

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Lissa Higby
Rochford Core Strategy
Programme Officer
Council Offices,
South Street,
Rochford
Essex
SS4 1BW.

Dear Lissa

Rochford Core Strategy Examination: Supplementary comments by Countryside Properties in response to “housing location audit trail” and additional papers issued by Rochford District Council.

I refer to the above additional documentation issued by Rochford District Council at the request of the Inspector, and your invitation to submit comments by the 28 June (your e-mail of 25 May 2010).

Firstly, in respect of the ‘**Vision**’, this appears to be largely an amalgamation of the text set out in respect of the individual topics, combined in to a single section, and the approach is therefore broadly supported.

However, the Inspector will be aware that we have made substantive representations regarding the phasing of the greenfield urban extensions set out in Policy H2, as set out in paragraphs 26-34 of our Matter 2 Hearing Statement (attached for ease of reference). In brief, the current phasing provisions result in an undue concentration of early release sites around Rochford/Ashingdon and Hawkwell, which is not only inexplicable and unjustified, but which is (a) not supported by the Evidence Base (in particular the Water Cycle Strategy) which shows a major constraint on early phasing of these sites, which is (b) not conducive to deliverability due to the surplus of supply in a single housing sub-market (as defined by the SHMA), and which is (c) inconsistent with Policy T2 of the Core Strategy which identifies a need for a variety of highway improvements to support development, and which primarily relate to problems of congestion in the eastern half of the District, including on the linkages between the east and west.

If the Inspector were to agree with our revised phasing proposals, then the Vision would need to reflect those changes, specifically in the second paragraph under the “In five years” heading on Page 2 and third paragraph under the “By 2025” heading on page 5: These two paragraphs refer to the timing of new primary schools at Rochford and Rayleigh, which are linked to the West Rochford and North of London Road (Rayleigh) proposals respectively. In our revised phasing, the Rayleigh primary school would come at the start of the Plan period, and the

Rochford primary school at the end. The two sentences used in the Vision for the two schools are the same, and the only change needed is to swap “Rochford” for “Rayleigh” under the “In five years” heading and vice versa in the “By 2025” section.

Turning then to “**housing location audit trail**”, we noted in our original representations that in the Preferred Options draft, the North of London Road site was identified for 650 units (450 prior to 2015, and 200 units post-2015). We queried why the Submission Draft had reduced the size of the scheme from 650 to 550 units, and delayed the commencement of the development to entirely post 2015 (thereby creating the anomaly in phasing described above).

We understand from the Audit Trail that between the Preferred Options Draft and Submission Draft, the Council were able to identify additional sources of urban land which led to the scale of greenfield/Green Belt development being reduced. This meant that the Council did not need to allocate some of the smaller peripheral sites (such as South-West Rayleigh, South-East Ashingdon etc), whilst the Council rightly concluded that where greenfield urban extensions did occur, it was preferable to concentrate development at strategic locations to ensure appropriate infrastructure provision and associated facilities.

The Audit Trail however provides no explanation as to why the scale of development North of London Road was reduced to 550 units, whilst at the same time the scale of development at West Rochford increased from 400 to 600 units in the Submission Draft. Increasing the extent of Green Belt land take at this location seems to run contrary to the general case that the principal reason for the changed numbers/deleted sites arose from a reduction in the overall Green Belt requirement. The Audit Trail also provides no explanation as to why the phasing of the West Rochford and South Hawkwell sites was amended to give a greater bias towards development in the early years, when as set out in our representations, the Evidence Base actually points to constraints in capacity in the eastern half of the district in the early years.

As set out earlier in this letter, the other consequence of the increase in the West Rochford growth area (and decrease in Rayleigh) and earlier phasing of the Rochford, Ashingdon and Hawkwell areas is to create a significant disparity in the overall distribution of housing, as set out in our written submissions to Matter 1 (again, copy attached for ease of reference). The Audit Trail similarly provides no explanation or attempts any justification to support that amended distribution.

The LDF Sub-Committee on the 1st July 2009 was invited to approve a complete draft of the Submission version of the Core Strategy for consultation, but neither the 1st July 2009 report nor the previous Committee report of 9th February set out a rationale for the proposed changes. So we know when the decisions to amend the Core Strategy set out above were taken, but the Audit Trail provides no more information as to why.

We also know that the Sustainability Appraisal does not provide any explanation or justification for the change in housing distribution, having found that both the Preferred Options distribution and the Submission distribution were similarly “... considered to be the most sustainable locations available, within the context of the overall high levels of population growth ...” (see pages 35 and 38 of the Audit Trail).

One piece of evidence that the Audit Trail does provide in relation to the land North of London Road is on page 12, and relates to education provision. Following the original Preferred Options draft (which proposed 1,800 units for Rayleigh as a whole), Essex County Council

noted in its response that an allocation of a single new housing site of around 700 units would be needed to deliver a new single form entry primary school.

We have set out in our submitted representations why we consider the phasing provisions in Policy H2 to be inappropriate in terms of the split of 'early release sites' between the eastern and western halves of the district, and why we consider the reduction in the scale of the development North of London Road to be unjustified. In the absence of any explanation for the phasing split or development quantum in the Core Strategy itself, in any background paper, or in the recently released Audit Trail, the current position is therefore that our arguments remain unchallenged by any contrary evidence on behalf of the Council. We therefore invite the Inspector to consider our evidence on that basis.

Turning then lastly to the "**Record of Correspondence between RDC and ECC**" on transportation matters relating to the allocation of land North of London Road, Rayleigh, being possible issues with access from the A1245 and public transport penetration (see 1st paragraph on page 2 of that document). For the avoidance of doubt, no access is proposed from the A1245, and a through-link for public transport between Rawreth Lane and London Road is proposed, assuring public transport penetration in to the heart of the site. There is no record of any objection from ECC to the site, whether at the original quantum of 650 units, or the reduced quantum of 550 units.

Notwithstanding our submissions regarding the quantum and phasing of development at our site North of London Road, we continue to support the general thrust of the development strategy set out in the DPD, and we look forward to working with the Council towards its successful implementation.

We trust that the above comments will be taken in to account by the Inspector.

Yours Sincerely

Steve Price
Senior Planning Manager

cc: Kevin Coleman – JB Planning Associates
cc: John Oldham – Countryside Properties (Special Projects) Ltd

**MATTER 1 – SPATIAL VISION
FURTHER WRITTEN STATEMENT BY
COUNTRYSIDE PROPERTIES (REF 8650)**

Policy/Paragraph/Reference from Core Strategy:

**Key Diagram - page 169
Settlement Hierarchy – pages 40-41**

(Representations 16209 and 16212)

Introduction

1. This brief additional statement is submitted by Countryside Properties in response to those questions raised by the Inspector under Matter 1 that relate to matters raised by Countryside Properties in its representations to the Core Strategy at Pre-Submission stage.

Question 1(b) – Will the Core Strategy deliver sustainable development in accordance with national and regional policy?

2. Countryside Properties consider that the general approach in the Core Strategy to the provision of new development is consistent with the principles of sustainable development. As set out in our original submissions, the basic premise of concentrating new development at the “Tier 1” settlements with a lesser provision at lower order settlements is entirely consistent with the approach to the sustainable location of development set out in PPS1, PPS3 and PPG13.
3. There is however a finite capacity to the existing urban areas, and again as set out in our original representations, we agree with the Council’s legitimate concerns regarding the adverse impact of “town cramming” on existing settlements. There is a balance between making good use of existing opportunities and over-developing in a manner that detracts from the innate character and functioning of the existing urban environment, and we generally support the Council’s approach in this respect (with the exception of our concerns regarding certain existing employment sites, covered elsewhere in our submissions).
4. Where development cannot be provided within the existing urban areas, we support the Council in providing urban extensions of a strategic scale that are capable of delivering a mix of uses, including employment, social and community facilities, and just as importantly an integrated package of transport proposals to encourage reduced car reliance.
5. We pointed out in our representations that Rayleigh is the most sustainable settlement in Rochford District, whether measured by size, retail offer, quality of public transport service, available infrastructure capacity, and range of community facilities. We noted however that the balance of new housing appears to focus on Rochford/Ashingdon, particularly in relation to new greenfield development. Indeed, even Hullbridge, which is a Tier 2 settlement, is projected to take a significant share of the growth.
6. The table below summarises the distribution of new Greenfield growth, taken from the Core Strategy. Although it is fair to note that the redevelopment of Rawreth Lane Industrial Estate (should it occur, which we consider unlikely) would provide an additional large allocation at Rayleigh, the scale proposed here (220 units) is still less than the proposed major ‘brownfield’ allocation at Stambridge Mills (250 units) at Rochford.

| Area | Category | Up to 2015 | Up to 2021 | Up to 2025 | Total |
|-----------------------|----------|------------|------------|------------|-------------|
| Rayleigh | Tier 1 | 0 | 550 | 0 | 550 |
| Rochford/Ashingdon | Tier 1 | 550 | 150 | 500 | 1200 |
| Hockley/Hawkwell | Tier 1 | 225 | 0 | 0 | 225 |
| Hullbridge | Tier 2 | 0 | 250 | 250 | 500 |
| Great Wakering | Tier 2 | 0 | 0 | 250 | 250 |
| Rural Area (Canewdon) | - | 0 | 60 | 0 | 60 |

7. Whilst we support the “Tier 1” focus, therefore, there does appear to be an imbalance between the provisions for Rayleigh and the less sustainable eastern settlements, and potentially a discrepancy in respect of the scale of development between Rayleigh and the Tier 2 settlements of Hullbridge and Great Wakering areas.

Question 1(c) – Does the Core Strategy make clear spatial choices about where development should go?

8. Countryside Properties generally considers that the Core Strategy makes clear spatial choices, and that the relevant Core Strategy policies, combined with the Key Diagram, makes clear where the broad areas for development will be.
9. However, in our original representations (to Policy H2), we noted that the Key Diagram is too vague and that there should be a clearer identification of the growth areas, because it is not possible currently for the reader to ascertain the likely extent/location of the likely development areas. Whilst we appreciate that there is a balance to be struck between over specificity in a Core Strategy and providing a strong strategic steer, it should at least be possible to draw some distinction between the size of the indicative growth locations on the Key Diagram. Currently, 60 units at Canewdon seems to be the same as 500 units at Rayleigh or Rochford.

Summary

- Settlement hierarchy sound, but not carried through to Policy H2 (see further representations on Matter 2)
- Key Diagram unsound, in terms of clarity (test of “Effective”), as set out above.
- Amend Key Diagram to show greater clarity/differentiation for growth areas.

MATTER 2 – LOCATION AND SUPPLY OF NEW HOMES

**FURTHER WRITTEN STATEMENT BY
COUNTRYSIDE PROPERTIES (REF 8650)**

Policy/Paragraph/Reference from Core Strategy:

**Policy H1 - page 42
Policy H2 – page 44
Policy GB1 – page 67
ENV9/ENV10 – Page 84
Para 8.43 – Page 84**

(Representations 16204, 16242, 16212, 16216, 16221, 16243, 16244)

Introduction

1. This additional statement is submitted by Countryside Properties in response to those questions raised by the Inspector under Matter 2 that relate to matters raised by Countryside Properties in its representations to the Core Strategy at Pre-Submission stage.

Question 2(a) – Will the strategy deliver the number of new homes required to meet the RSS requirements?

2. The short answer to this question is no, for the following reasons.
 - (i) The Core Strategy fails to carry forward the RSS “minimum” requirement, and there is accordingly a policy deficit in the housing provisions; and
 - (ii) The Core Strategy is reliant upon a number of ‘brownfield’ sites that will not deliver in the Plan period (or possibly at all), and it has no flexibility to counter for this shortfall.
3. In respect of the first matter above, the Inspector will be aware that Policy H1 of the adopted RSS states that “District allocations should be regarded as minimum targets to be achieved, rather than ceilings which should not be exceeded”. To exceed 4600 dwellings by 2021 is to comply with the RSS, and to fall short is to be in conflict with the RSS.
4. There is no disputing the RSS residual requirement of 3,790 dwellings 2006-2021. Paragraph 4.6 and the accompanying table on page 39 of the Core Strategy show a proposed housing supply, based on all existing completions to date, all extant planning permissions, and all allocations/SHLAA sites of just 2005 units (1,499 units 2006-2015 and 506 units 2015-2021).
5. To add to this figure, the Council proposes 1,745 units within the Green Belt up to 2021 (751 up to 2015 and 994 up to 2021), making a grand supply total of 3,750 units, 40 units below the minimum. Although Policy H2 corrects this discrepancy by increasing the Green Belt yield to 775 units to 2015 and 1010 units to 2021 to make up the shortfall, the land supply information shows that the Core Strategy is actually based on achieving a maximum of 3,790 dwellings by 2021, since that figure can only be reached if 100% of the identified supply is realised.
6. There is moreover no mention of the housing requirement being a minimum target in either H1 or H2. There is as far as we are aware only one reference to minimum in the context of these policies, which is at paragraph 4.17, and which essentially makes clear that this Plan does not intend to treat the RSS requirement as a minimum, because of the Green Belt.
7. The need for the East of England Plan minimum requirement to be overtly expressed in Core Strategies was identified by the Inspector in the report on the Colchester Core Strategy. In that case, the Inspector noted at paragraph 7.35 of the Examination Report that:

“ ... in order for the CS to be sound in terms of conformity with PPS3 and the EEP (test 4), changes are needed to policy SD1, table H1a and related text to make clear that the 19,000 dwellings is a minimum not a ceiling ...”

8. Since this Core Strategy neither makes provision in practical terms for a minimum requirement nor recognises the need to do so (without qualification and unequivocally), it is inconsistent with the RSS and PPS3.
9. Turning to the second issue we identify (that of reliance on sites that will not come forward in the Plan period), we raised in our original representations concerns regarding the availability and deliverability of both the Stambridge Mills and Rawreth Lane Industrial Estates, which together provide just under 500 units in the Council's SHLAA. We have also subsequently become aware of the representations from the owner of the Foundry Industrial Estate in Hockley, relating to the potential lack of availability of that site, which may also be relevant.
10. The Inspector will be well aware of the objections made on Flood Risk grounds to the Stambridge Mills proposal. Even if an exception can be justified under PPS25, 250 homes at a density of just under 140 dph is a very high density for a site in such a relatively remote location (page 120 of the Core Strategy gives the site area as 1.8ha). It is difficult to see how this intensity of development is justified, when the recommended density for town centres is only 75+ dph.
11. In respect of Rawreth Lane Industrial Estate, we raise in our separate statement under Matter 4 our concerns in respect of the impact on employment. Since the Core Strategy seeks for the existing employment to be replaced West of Rayleigh, it is in any event difficult to see how reallocation of this site for housing reduces Green Belt land-take, since the replacement employment must be in the Green Belt. However, as set out in our original submissions, our primary concern in relation to housing supply is that there is no evidence to support the contention that the site is deliverable, but there is evidence (multiple landownership, multiplicity of tenants/occupiers, costs involved in site assembly and decontamination) to suggest that it would not.
12. The problem for the Core Strategy is that if only one site identified in the SHLAA fails to come forward as expected within the Plan period, there is zero flexibility in the identified land supply. There are serious question marks in respect of the two most significant PDL allocations as identified above, and no contingency arrangement in the Plan to deal with one or more SHLAA sites (or indeed one of the Greenfield sites) not coming forward as anticipated.
13. PPS12 paragraph 4.46 provides guidance on flexibility. This Core Strategy has no contingency arrangement to fall back on should one or more major sites fail to deliver as expected. The only recourse in the event of a site such as Stambridge Mills or Rawreth Lane not coming forward would be to revisit the Core Strategy itself, which is exactly what paragraph 4.46 advises against, and which would be particularly inappropriate in this case given the fact that the purpose of such a review would be to have a second amendment to the Green Belt boundary in a short space of time, creating conflicts with PPG2 as well as PPS12.

Question 2(b)(i) - Is the Core Strategy consistent with PPS3 in respect of ... housing delivery for at least 15 years from the date of adoption?

14. Our answer to this question is no, for the same reasons given above in relation to Question 2(a).

Q2(b)(ii) Bearing in mind that Green Belt releases may be necessary, does the CS provide the appropriate context and give adequate guidance for a subsequent site allocations DPD readily to identify the land needed without having to re-visit strategic considerations?

15. In our separate statement to Matter 1 (Question 1C), we noted that a degree of greater specificity on the Key Diagram would be beneficial.
16. We have also raised in our answer to Question 2(a) above our concern regarding the lack of flexibility in the Council's land supply position. In reality, given the constraints on capacity within the urban areas, the only source of flexibility in supply will come from the proposed Green Belt urban extensions.
17. Our concern in relation to Green Belt is that Policy GB1 sets a wholly inappropriate strategic context for the subsequent Site Allocations DPD in terms of the role of that latter document in setting a revised Green Belt boundary.
18. PPG2 provides the relevant guidance, and paragraphs 2.8, 2.12 and Annex B are particularly relevant.
19. Paragraph 2.8 notes that if boundaries are drawn excessively tightly around existing built-up areas, it may not be possible to maintain the degree of permanence that Green Belts should have, and that such an approach devalues the concept of Green Belt and reduces the value in Plans making proper provision for necessary development in the future.
20. Paragraph 2.12 in respect of Safeguarded Land confirms that any proposals affecting Green Belts must relate to a longer timeframe than for other aspects of the Plan, i.e. in this case, beyond 2025. There is a positive requirement (as opposed to an optional choice) on Local Planning Authorities to address the need for Safeguarded Land when reviewing Green Belt boundaries, and there is a need to be certain that Green Belt boundaries will not need to be reviewed at the end of the Plan period. The RSS provides a strategic context for this consideration, since H1 makes clear that the same rates of provision should continue after 2021.
21. The stipulation in GB1 that the Council will "allocate the minimum amount of Green Belt land necessary" restricts the Site Allocations DPD to only considering the quantum of land required up to 2025, and therefore completely ignores the requirement in PPG2 to set a long-term, permanent Green Belt boundary that will not need to be altered at the end of the Plan period.
22. The Green Belt is not a mechanism by which land is released for development on a 'hand to mouth' basis – its essence is its permanence. There are exceptional circumstances arising from the RSS development requirement to review the inner

Green Belt boundary, but this should be a one-off review that re-establishes a permanent Green Belt for the future, which is capable of accommodating development requirements beyond the Plan period without needing to change. The Core Strategy should not fetter the Site Allocations DPD in undertaking that proper long-term view.

Question 2(b)(iii) – Is there sufficient flexibility, and will the Core Strategy deliver a continuous supply of housing land?

23. In relation to the first part of this question in relation to flexibility, the answer is no, for the various reasons given above, namely:
- (i) There is no flexibility on the land supply side, with 100% of existing commitments and SHLAA sites needed to meet even the RSS minimum, and no apparent flexibility at the growth locations;
 - (ii) There is no flexibility on the policy side, in terms of giving unequivocal expression to the RSS “minimum” requirement;
 - (iii) There is no flexibility expressed at the Green Belt growth locations, either in terms of quantum of development or phasing.
 - (iv) There is no flexibility for the longer term, due to the inappropriate wording of GB1.
24. In relation to the matter of continuous supply, our representations raised two main issues, being firstly the lack of any recognition of a 5 year land requirement under PPS3, and the inappropriate phasing proposed under Policy H2.
25. In relation to 5 year land supply, we do not re-iterate the comments made in our original submissions. Policy H1 should make clear that the Council will make sufficient land available to ensure a 5 year land supply in accordance with PPS3, and demonstrate how this will be achieved.
26. Turning to Policy H2, we have major reservations regarding the appropriateness of the proposed phasing in Policy H2, in terms of the specific Greenfield locations identified for development prior to 2015. Having regard to the Council’s evidence base, we would make the following comments.

Thames Gateway South Essex Strategic Housing Market Assessment

27. All of the 775 units proposed fall within the same broad housing sub-market identified in the SHMA. The table at page 20 of that document identifies the primary sub-markets as Thurrock, Basildon and Southend, and within Rochford District, it identifies Rayleigh and Rochford/Hockley as separate Secondary Sub-Markets.
28. The house building industry operates on the basic premise that houses are only built as quickly as they can be sold, and therefore the delivery of new homes is dependent upon the size of the catchment market for buyers. All of the 775 homes proposed in the Rochford/Hockley sub-market will effectively be competing with each other for the same house-buyers, which will inevitably impact upon the speed

of delivery. At the same time, H2 currently proposes no Greenfield development pre-2015 in the more buoyant sub-market of Rayleigh (as evidenced both by our experience and by the SHMA in terms of property prices).

29. The concentration of all of the 'early-release' Greenfield sites in the Rochford/Hockley secondary sub-market is therefore not conducive to delivery or a continuous supply of housing, according to the evidence in the SHMA.

Essex Thames Gateway Water-Cycle Study Scoping Report

30. Although still a work in progress, one of the substantive findings of the Water-Cycle Study (Section 6.3, see in particular Page 46) is that there is no spare capacity at Rochford WWTW, and capacity issues will need resolving post 2015, as well as potential issues at Rayleigh East WWTW. Conversely, there are no capacity issues at Rayleigh West WWTW.
31. It is difficult to see how it is appropriate to concentrate the vast majority of new development pre-2015 at locations where foul drainage capacity is restricted until post 2015.

Policy T2 Highway Improvements

32. Policy T2 identifies a number of highway projects that the Council intends to achieve to resolve matters of existing highway congestion, road flooding, and poor signage. It will be apparent that the majority of highway improvements identified are either locationally specific to Ashingdon/Rochford (Brays Lane, Ashingdon Road, Rectory Road) or Hockley (Spa Road/Main Road), or the B1013 which links Rochford and Hockley to Rayleigh.
33. Given the existing constraints on the network and the difficulty of east-west links highlighted by the Council in the Core Strategy, it is difficult to see how concentrating all of the major early land releases at the locations most in need of strategic highway improvements will be conducive delivery.
34. For all of the above reasons, Policy H2 does not present an effective policy that will facilitate a flexible and continuous supply of new homes, in accordance with PPS3.

Question 2(c) – Are the broad locations identified for the supply of new housing the most appropriate when considered against all reasonable alternatives?

35. In relation to Rayleigh, we consider the answer to the question is Yes. We have set out in our previous representations why we consider West Rayleigh to be the most appropriate urban extension location.

Question 2(f) – Is there adequate evidence of local circumstances that both warrant and allow the introduction of local policies in relation to CSH and BREEM standards?

36. We do not consider that any substantive evidence has been advanced to justify a different approach in Rochford to national standards.
37. As well as not being justified, we set out in our original submissions are further concerns regarding the effectiveness of such an approach, and the difficulties it will entail. In summary, these include:
 - It is important that improvements in building performance are not undertaken at the expense of housing delivery (see “Building a Greener Future Policy”). Advancing CSH requirements above national requirements at a time of subdued viability has obvious consequences for short-term land supply (and as set out in our representations to H1, the 160 per annum that Rochford achieved 2001-2006 was already one of the lowest rates in Essex);
 - National policy and standards are subject to constant and rapid review. Setting local standards may actually render the Core Strategy obsolete or at least fundamentally at odds with national policy in a short period of time;
 - Technical difficulties with implementing the higher code standards (for example in relation to water conservation and surface water run-off) have started to emerge, as set out in our original submissions.

Summary/Proposed Amendments to the Core Strategy

As set out in our original submissions, a number of amendments to the Core Strategy are required in the light of the above, including:

- Policies H1/H2 – Lack clarity/specificity in terms of PPS3/RSS housing requirement for 5 year and 15 year period. Fail “Effective” test. Changes required are:
 - Clear recognition that RSS requirement is a ‘minimum’, and all figures in H1 and H2 should be identified as such (as well as reference to minimum in ‘headline’ figures, Colchester’s policy contains a footnote to say “The figures shown are intended to be minimum numbers. The dates shown are subject to change should monitoring prove this is necessary” – we commend this addition;
 - Policy H1 should recognise the need for a 5 year land supply, and set out how 15 year requirements are to be met, specifically by including a table along the lines set out on pages 39/40;
- Policy H2 phasing fails “Justified” test for reasons set out above, and “Effective” test in terms of delivering the housing supply therein, again for the reasons set out above. The phasing in Policy H2 should be amended to ensure a balance of early delivery between the Rayleigh and Rochford/Hockley Sub-Markets (with a similar caveat on minimum numbers/timing as above – these minimum figures will help create flexibility in the event of the need for a contingency approach. Change H2 to show 250 units north of London Road by 2015, and 300 post 2015. Adjust provision elsewhere (e.g. west Rochford) to compensate.
- Policy GB1 should be amended to remove the reference to ‘minimum amount’ – contrary to PPG2 so fails “National Policy” test as well as “Effective/Justified” tests. In respect of the latter tests, there should be flexibility for the revised Green Belt boundary, to be established through the Site Allocations DPD process, to provide for long-term development requirements, in accordance with PPG2. Removing the “minimum amount” reference should assist with this;
- No minimum targets for CSH/BREEM should be included, in preference to reference to national requirements (fails ‘National Policy’ test and ‘Justified’ test). Delete para 8.43. Delete all of ENV9 after 2nd sentence. Delete ENV10 or revise to exclude specific criteria.