Dear Mrs Housden

Further to my letter of 29 May 2019 notifying you that the Council wishes to review matters surrounding the Local Plan, I am writing to you jointly with the Leader of the Council.

There is a high level commitment from the Council to conclude the Local Plan expeditiously to establish a sound Plan and an adopted Plan. Both conclusions are objectives of the District Council and the Government. It is essential therefore that the process continues in a direction to achieve these outcomes.

The Local Government elections on 2 May returned a new administration that is acutely aware of, and committed to, the consequential concerns of residents surrounding certain aspects of the Plan, and particularly the exceptional circumstances justifying the allocation of Green Belt land for development.

To achieve a sound and an adopted Plan, Green Belt releases must be fully evidenced by exceptional circumstances necessitating the proposed revisions to the Green Belt boundaries – and, if not, they should not be allocated. To include Green Belt releases in the absence of exceptional circumstances would not accord with national policy and would not therefore be a sound approach.

There are three factors which lead the Council to conclude that the case for exceptional circumstances in respect of the remaining Green Belt allocations now needs to be reviewed.

Firstly, on 18 February 2019 you advised that exceptional circumstances have not been demonstrated to justify the alteration of the Green Belt boundaries and the removal of land for development on Sites DR2 and EC1 nor for the proposed alterations to the boundary to remove Site DR1 in its entirety. Consequently, the submitted Plan was unsound in this regard and main modifications were proposed to rectify this.

In doing so it was believed at the time that the Plan would be short of its 6600 housing plots target by 257. The stance taken was that there would need to be an early review of the Plan to establish future housing requirements and land supply and a specific timescale and commitment to this would need to be included as a main modification. Having such a shortfall with a commitment to an early review would satisfy you that the Plan would be sound.

Secondly, in your letter dated 18 February 2019 you asked the Council to provide updated completions and commitments data. This data has demonstrated that those figures were higher than previously anticipated.
In April 2019 the Council carried out its annual housing completions and permissions monitoring which concluded that there were more permissions than had been estimated in February. Consequently, taking into consideration the alteration of the Green Belt boundaries and the removal of land for development proposed in February the Plan would be short of its 6600 housing plots target by only 80. This has led to an evidenced trajectory of accelerated house building in the coming years.

Thirdly, the justification for exceptional circumstances necessitating the revisions to the Green Belt boundary was based on the wording of the Spatial Strategy in policy SS2. In your letter dated 18 February 2019 you recommended a modification to this wording. It will be necessary to consider whether exceptional circumstances exist in light of the less prescriptive spatial strategy you have proposed.

The Council has always taken the position that it must only put forward Green Belt sites in exceptional circumstances as required by the NPPF. If the Plan would be sound with a commitment to an early review with a 257 home shortfall, following the annual completions survey and the other developments in the Council’s situation as outlined above, it must now be considered whether the amount of Green Belt currently being released for development is necessary and justified by exceptional circumstances.

As a result, the Council is proactively seeking your consideration of amendments to ensure this. For example, we invite your comments on main modifications such as removal of Green Belt sites DR1 in full and KL1, leading to the Plan being short of its 6600 housing plots target by 570, and whether you believe that this would still deliver a sound Plan and achieve the Plan’s current Spatial Strategy, with the same commitment to an early review.

The Council is seeking a pragmatic solution to enable a sound Plan to be adopted as soon as possible. We therefore ask you to advise on the full extent of the shortfall that you consider would achieve a sound Plan, in line with the example outlined above, along with the principles and procedures you would see being appropriate to follow for the Council were it to put forward such amendments. We would also invite you to comment on whether a modification such as the one described above is necessary to make the Plan sound in light of the changes in circumstances listed above.

Yours sincerely

Councillor Martin Thacker MBE  Dan Swaine
Leader of the Council  Chief Executive