

Inspector's Response (to questions from the Council dated 31 January 2014)

Without prejudice to my report, I respond to each of the questions from the Council in turn:

Question 1:

The G&T Local Plan allocates 4 sites for development (GTS 2-GTS 5), however, as you are aware, planning permission has already been granted for two of the sites; 11 pitches at Old Damson Lane (GTS 2) and 4 pitches at The Uplands (GTS 4). Do you require all 4 sites to be identified as insets within the Green Belt, including those with planning permission?

As you are aware, I consider the proposed allocated Green Belt sites should be included as insets in the Green Belt to ensure the Plan is effective. If the sites were to remain in the Green Belt, the material change of use of those sites would remain inappropriate development. There would be tension between the Local Plan allocations and the National Planning Policy Framework which confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Accordingly there could be no certainty that planning permission would be forthcoming and in turn, whether the Plan would be effective in delivering the sites.

Against that background, there is greater certainty that those sites with planning permission already in place will be delivered. However, should those permissions for any reason not be implemented within the timescales of the current permissions and subsequently lapse, then it would be necessary to secure planning permission again. In such circumstances, if the sites were to remain in the Green Belt, and notwithstanding the allocation in the Local Plan, the use would remain inappropriate development in the Green Belt.

I would suggest that all four sites should be included as insets. This would also ensure a consistent approach.

Question 2:

Where the proposed site allocations comprise extensions to existing authorised sites e.g. The Warren does this mean that only the extension will be removed from the Green Belt? This would leave the existing part of the site within the Green Belt and the proposed extension as an inset?

None of the proposed allocated sites can be developed without access being provided through the existing sites; in other words they are effectively land-locked. To ensure the allocated sites are deliverable it is necessary to ensure that they can physically be developed. One way to ensure this would be to identify the existing sites as insets alongside the allocated sites.

Alternatively, the Local Plan clearly safeguards the existing sites for use as gypsy and traveller sites only. It may be that the Council consider this would

be sufficient to ensure that the allocated sites can be delivered. The Inspector would welcome your views on this point.

Question 3:

As regards the proposed extension to The Haven and the recommendation to comprehensively redevelop the whole site. If this were acceptable to the Council, would this mean that the whole of the Haven would constitute a site allocation and therefore, the whole site would need to be taken out of the Green Belt?

If the Council consider that existing sites should be included as insets in response to question 2 above then of course, that would be applicable to The Haven.

If not, then it is necessary to consider if the existing site needs to be included as an inset to ensure that a comprehensive re-development of the site could be delivered in conjunction with an extension to the site, thus ensuring the Plan is effective and the extension both justified and deliverable.

If the existing site were not included as an inset, the Council would be left in the position of determining a planning application for a scheme that comprises land that is partially within the Green Belt and partly outside. This would present some practical difficulties. Whilst there would be no material change of use of land involved on the existing site and so, the continued use of the site for the stationing of caravans for residential purposes would not, in itself, be inappropriate development, it is likely that engineering works and new buildings would be required to facilitate a comprehensive redevelopment of the site. This would require an assessment to establish whether these works constituted inappropriate development in the Green Belt or not. This would give rise to uncertainty about whether the re-development of the site in conjunction with an extension is deliverable and in turn, whether the Plan is effective.

I would therefore suggest the existing site at The Haven should be included as an inset. Again, the Inspector would welcome your views.

Claire Sherratt
Inspector

7 February 2014