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Laura Wood
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1st November 2016

Dear Ms Wood,

At the end of the hearing sessions in relation to the Council's Site Allocation Local Plan (the Plan) I indicated that I had some concerns in relation to site LA5, but that I would give the matter further thought and then contact you in writing.

I have reflected on what I heard at the hearing sessions where this site was discussed, as well as the submitted written evidence. On the basis of this verbal and written evidence I have serious concerns that the gypsy and traveller site element of site LA5 is unsound. This is because of the lack of a formal assessment by the Council to assess its likely impact on the Chilterns Area of Outstanding Natural Beauty (AONB) and in particular whether it would conserve and enhance the natural beauty of the AONB.

While I realise that all 3 of the gypsy and traveller sites in the Plan are necessary to meet the identified need over the Plan period, I am aware that the Council are in the process of preparing a comprehensive Local Plan that will be based on a range of updated evidence, including a new gypsy and traveller needs assessment. At the hearings you explained that you expected to adopt this Local Plan in 2018 and that you were in the process of updating your Local Development Scheme (LDS) accordingly. So, in reality the important thing is that you can demonstrate that you have a 5 year supply of deliverable gypsy and traveller sites and that you are committed to having an adopted full local plan in the foreseeable future.

It would appear that a 5 year supply of deliverable gypsy and traveller sites would be provided by sites LA1 and LA3 and I heard at the hearing sessions that the developers of site LA3 are committed to providing the gypsy and traveller site element of their site and that its provision is considered to be viable. Moreover, at the hearings you advised that you would be taking a relaxed position in relation to the delivery of the local allocations (not just LA5), given the limited time between now and 2021. While Core Strategy (CS) Policy CS3 states that local allocations will be

delivered from 2021, it also says that 'the release date of any local allocation may be brought forward in order to maintain a five year housing land supply'. The slight early release of sites LA1 and LA3 could be justified because of the need to provide a 5 year supply of land for gypsy and traveller pitches.

In terms of the phasing of LA5, given that it would no longer provide for the identified gypsy and traveller need, the wording of this policy could be amended to ensure compliance with policy CS3 or left as it is to help boost the supply of housing land in the borough. This is especially so given the lead in time that would be necessary to delivery houses on the site from 2021 and the demonstrable need to provide a cemetery here in the short term.

In conclusion, for the Plan to be found sound the Council will need to, as a minimum, advance main modifications to remove reference to the provision of a gypsy and traveller site as part of LA5; make it clear that sites LA1 and LA3 can come forward immediately and include some text which shows that the Council is committed to adopting the emerging full local plan in accordance with the latest LDS – so 2018? Consequential changes to other parts of the Plan are also likely to be needed and the map book will also need amending.

In reaching these conclusions I have also had regard to concerns expressed by some representors in relation to the proposed public open space to be provided as part of LA5, which is also within the AONB. However, this element of the proposal was considered at the CS stage and the adopted CS says that, among other things, LA5 will provide playing fields and open space. It also recognises the need for a transition between the AONB and the proposed development. Moreover, policy L/3 says that this will be a mix of parkland and informal open space and that this could include pitches for outdoor sports and will provide a neighbourhood play area. I am satisfied that this element of the proposal has been fully considered and that it can be designed to provide the soft edge and transition with the AONB talked about in the CS. By comparison the gypsy and traveller site which was added at a much later stage to the allocation would be materially different in nature not only because of its proposed location, jutting into the AONB, but its lack of defensible boundaries, its distance from other built development and the inevitable built up nature of it.

Can you please forward a copy of the proposed main modifications arising from this note to me prior to advertising them, along with all of the others proposed? Please also advise which main modifications the Council consider need to be subject to further sustainability appraisal. I will than look at the proposed main modifications and your opinion in terms of sustainability appraisal and respond accordingly.

Yours sincerely

Louise Crosby
INSPECTOR