Chris,

Happy New Year to you and to Mr Lewis.

We write further to the Inspector-led consultation regarding Document TED 17 (Housing Yields) on behalf of our clients Berkeley Strategic. As the Inspector will be aware we participated in the relevant Hearing sessions and submitted Hearing Statements. This brief note supplements those written and oral submissions.

As discussed at the Hearing sessions, there appears to be some ambiguity as to the purpose of this document. It has been unilaterally prepared by the Council, purportedly in response to suggestions by promoters of some of the proposed draft allocated sites that they are capable of yielding higher dwelling numbers than that proposed in the submission Local Plan. We understand that the intention from the Council would be for the ‘number of units’ referred to in the submitted Local Plan is to be amended in such a way that it refers to the ‘minimum’ number of homes that could be accommodated on each proposed allocation.

At the Hearing sessions we highlighted various concerns with the majority of the proposed allocations, not least in terms of the Council’s site selection process, but some demonstrable on-site issues where there is a lack of evidence already before you to support their allocation as currently proposed. These objections related to matters of substance regarding flood risk, landscape impact, accessibility, deliverability, heritage impacts, as well as the requirement to relocate sports pitches and provide appropriate education facilities.

The flaw with the Council’s approach is of course that there is no analysis before you to demonstrate whether a greater level of development could be achieved on specific sites. We note that the Council’s own analysis of the proposed allocations highlights that the majority of these are on land in the Green Belt with many also being subject to other environmental factors, such as flood risk and heritage considerations, as well as needing sensitive treatments to settlement edges.

Our concerns regarding the deliverability of a number of these sites and the lack of flexibility within the draft Local Plan would fundamentally not be resolved by changing the expected yield of housing to a minimum figure.

This document represents a flawed approach to Plan Making and any suggestion that these sites can and should be amended to seek to introduce these new ‘minimum’ dwelling numbers is unjustified and unsound.

Regards
Tim