

## **Housing, Employment and miscellaneous key issues workshop May 2011**

### **Response to comments on Policy HG3: The use of Previously Developed Land (PDL) for new housing development**

#### **Introduction**

Policy HG3 seeks to provide a minimum of 30% of new dwellings on previously developed land over the period of the Core Strategy. This paper highlights the key issues raised during the consultation and outlines a response in the light of proposed changes to national legislation.

#### **Summary of issues**

There were 10 comments made on Policy HG3, comprising 2 in support, 5 objections and 3 observations – the issues raised are set out below:

- The low target of 30% is unjustified and the policy should be reworded to reflect national policy, which states 60%.
- Suggested target of 30% is unsustainable and falls below national targets.
- The target of 30% is not good enough and will lead to urban creep/crawl destroying the very nature of the District that makes South Somerset an attractive place.
- To propose this amount of greenfield building is madness.
- Agricultural land must remain as such.
- Unoccupied properties should be used before greenfield sites are developed.
- Do not object to the principles of the policy, but do object to the unrealistic reliance placed upon brownfield supply.
- The policy is strongly supported, but needs to be supported by a continued supply of greenfield land.
- Support maximising housing development on PDL, but not at expense of promoting uncharacteristic high-density development.
- Imposing significant planning obligations on landowners within urban area deters promotion of brownfield land for residential purposes.

#### **Additional issue:**

It was announced in the March 2011 Budget that “<sup>1</sup>the Government is removing the centrally imposed target specifying the levels of development that should take place on previously developed land.” However, the same document also states “The Government expects a very significant proportion of development to continue to take place on previously developed land.” With the proposed revocation of the Regional Spatial Strategy targets are expected to be determined locally. In addition the removal of garden plots from the PDL category will also affect the proportion of new housing built on PDL.

#### **Response:**

It should be recognised that PDL is a limited resource in South Somerset due to the predominantly rural nature of the District. A high proportion of development over the past few years has been on PDL but sufficient housing for the projected future population would require more greenfield sites. The Draft Core Strategy target of a minimum of 30% of new development on PDL was derived locally from figures for housing completions and commitments during the first three years of the Core Strategy period, and predicted levels of brownfield land use for the residual housing requirement up to 2026. The policy allows for annual review of the figure through the Annual Monitoring Report. Strong protection for the environment will be maintained through national and local policies.

#### **Recommendation:**

No change to draft core strategy policy HG3

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<sup>1</sup> The Plan for Growth, HM Treasury/Department for Business, Innovation and Skills March 2011