

CORE STRATEGY FOR CHILTERN DISTRICT - EXAMINATION**INSPECTOR'S PRELIMINARY QUESTIONS (2) – THE SPATIAL STRATEGY.****1. Introduction**

1.1 A main matter for the Examination will be the Spatial Strategy and the overarching questions will be: *is the spatial strategy clearly expressed; does it derive from a proper consideration of reasonable alternatives; and is it justified by evidence?*

1.2 I have seen no significant evidence to suggest that the 4 scenarios set out in the *Core Strategy Options Paper* June 2008 (CDN049) excluded any reasonable alternative and I do not intend to explore further matters prior to that Paper. I regard the 4 scenarios set in the 2008 Paper as the critical starting point. The submitted Core Strategy indicates that the chosen strategy derives from a choice of one of those options.

1.3 A considerable number of representations question the consultation process and whether, in finalising the strategy, the Council has adequately taken into account public comments. It is therefore important to be clear as to what the Council has done and how the locational strategy has evolved.

1.4 For the reasons given below, I have found it difficult to understand the sequence of decisions relating to the locational strategy since the June 2008 Paper; whether the chosen locational strategy is Option/Scenario 3 as it purports to be; and whether what the Core Strategy is actually proposing in its policies would deliver the stated chosen strategic option.

2. Further Clarification

2.1 The Council has provided extensive volumes of material of the reports to the Council cabinet/committee following each consultation document (including CDN095, CDN108 and CDN107) and a summary of the main comments arising from consultation. But the minutes of Council decisions are not included. To avoid me spending a disproportionate amount of time trying to establish what was recommended to the Council, what was decided by the Council and how it was translated into the subsequent consultation document, I would be grateful if the Council could urgently produce a short summary paper which indicates, from the June 2008 Paper, onwards the following:

a) What strategic option/scenario was recommended by Council officers to be taken forward and how that was option described. (Please indicate the date of the report to committee which contains any such recommendation);

b) The decision of the Council at each stage as to what was the locational strategy to be taken forward. Please append the minutes and highlight whether there was any variation to the recommendation.

c) Whether, in reporting the subsequent consultation draft to Committee/Cabinet prior to publication, there was a recommendation to change the strategy previously agreed. Again, please indicate what was the Council's decision.

2.2 I am not seeking any new analysis or justification and the primary explanation should be drawn from the existing documents. I hope that this brief new paper could be produced quickly. *It would be helpful if the Council could let me know how long this paper might take to produce (as well as the timescale for a response to my first note).*

3. Comments

3.1 I would make the following comments as to why I have found this matter difficult to follow.

3.2 Core Strategy paragraph 7.3 is intended as a summary of the 4 options which were set out in the *Core Strategy Options Paper* June 2008 (then termed scenarios 1-4). But different words are used to describe 2 of the options. Paragraph 7.3 b) and c) refer to *concentrating new development* in the most accessible major settlements (either 2 or 3 such settlements) whereas Scenarios 2 and 3 in 2008 referred to *Targeted Expansion* of those settlements and envisaged some changes to Green Belt boundaries as a result. Such differences in words is confusing and might be relevant because in the 2008 consultation, Scenario 1 was specifically described as *Urban concentration*. This envisaged the status quo with development in all non-Green Belt settlements and no change to GB boundaries. My initial impression is that this description better fits what is set out in policy CS2. (A similar comparison is highlighted in the representations from Drivers Jonas Deloitte - 362045).

3.3 The summary of the 4 Options in CS 7.3 is similar to that set out in paragraph 7.6 of *The Draft Core Strategy for Chiltern Document 11 March – 23 April 2010* (CDN084). But again, whilst 7.6 appears to be intended as a summary of the options set out in 2008, it uses the words now set out in the Core Strategy rather than in the 2008 document.

3.4 The Report to the Housing and Planning Committee, 17 September 2008 (which formed the main consideration of the merits of the scenarios presented to the Cabinet, 30 September 2008) recommended Option 3 and correctly identified that this option contemplated some changes to the Green Belt.

3.5 My impression is that the most significant change in emphasis (or presentation) occurred between the decision of the Cabinet on 30 September 2008 and the approach set out in the March 2010 consultation document (CDN084). The Cabinet had agreed Scenario 3 subject, according to the Minutes, to a trigger mechanism in relation to contingency Green Belt sites. Paragraph 19.2 of the March 2010 consultation indicates, in effect, that the SHLAA (at that time, the 2008 report) had identified sufficient sites to meet the South East Plan (SEP) requirement such that there was no need to review the boundaries

of the Green Belt. The strategy set out seems closer to scenario 1 than the *Expansion of the 3 main settlements*, which is the original description of Scenario 3.

3.6 As you will be aware from the my first note, it will be necessary to explore carefully the Council's justification for housing provision below that required in the SEP. The Council's case is based on what is now considered to be a constrained land supply within the urban areas, which prevents achievement of the SEP requirement. The lower housing figure is based on the Council's resistance to any review of the Green Belt to accommodate housing (other than at MDS). The Council will no doubt appreciate why it is difficult for me to understand the Council's position when its is stated in the Core Strategy that the chosen locational strategy (Option 3) is one which, in 2008, recognised that some release of Green Belt around the main settlements might be required and that this consequence was taken into account in balancing the advantages and disadvantages of the different options. The Council may have decided to adopt a different strategy but, if its has, the change has not been clearly explained.

3.7 I would emphasise that, at this stage, I am seeking only to better understand the process leading up to the choices made in the Core Strategy and to alert the Council to difficulties I am encountering. Once I better understand what has occurred, I will be able to frame appropriate questions to structure the further examination of this matter.

Simon Emerson
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2 February 2010.