

MID SUFFOLK DISTRICT CORE STRATEGY FOCUSED REVIEW

NATIONAL PLANNING POLICY FRAMEWORK

MODEL PLANNING POLICY (Presumption in favour of Sustainable Development)

COMMENT BY: J & J Design (Mr John Shephard)

ON BEHALF OF: Bacton Gospel Hall Trust
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INTRODUCTION

Bacton Gospel Hall Trust are a charitable ecclesiastical trust responsible for provision and maintenance of Gospel Halls for the Brethren's Christian Fellowship in Ipswich area. The Ipswich assembly is currently focused around a large hall in Ipswich with several smaller 'local' halls in the area. The Trust is currently promoting a replacement large hall at Martlesham, between Ipswich and Woodbridge in Suffolk Coastal District

However, church members live and work on the Ipswich fringe areas such as Claydon and Bramford. Accordingly the Trust may have a requirement for a new Gospel Hall in this area of Mid Suffolk within the plan period.

Brethren's Gospel Trusts, representing local Trusts in about 70 towns and cities in England, have participated in the development of the NPPF. In addition to the general presumption in favour of sustainable development, the NPPF also explicitly recognises the need for places of worship (NPPF paragraphs 28, 70 and 171).

1.10 Does the CSFR comply with the policies of the Framework and does the CSFR adequately address the national presumption in favour of sustainable development?

For the reasons set out below, the Trust believes that the CSFR does not fully comply with the policies of the Framework and fails to adequately address the national presumption in favour of sustainable development.

1.11 Has the CSFR had regard to national policy? Is the CSFR consistent with the National Planning Policy Framework (NPPF of the Framework)? Are any modifications necessary to make the CSFR sound as a result of the publication of that document?

Strategic Objective SO3 appears to be compliant with NPPF paragraphs 29 and 30.

Strategic Objective SO6 appears to be compliant with NPPF policies which encourage delivery of sustainable development including:

- Building a strong, competitive economy;
- Ensuring the vitality of town centres;

- Delivering a wide choice of high quality homes; and
- Promoting healthy communities.

Whilst the Trust welcomes the Revised SO6 and consider this to be compliant with the NPPF policies in a broad sense, the original Core Strategy and the CSFR both fail to develop any detailed policy guidance to support social infrastructure delivery generally and provision for social and community needs particularly, including for the needs of faith communities. In this respect, the CSFR is inconsistent with the NPPF which places added emphasis on the social role of planning, recognising that strong, vibrant and healthy communities need both adequate housing supply and accessible local services to support health, social and cultural well-being of the community (see NPPF paragraphs 28, 70 and 71).

Unfortunately, the Trust does not appear to have engaged with the Council during the original Core Strategy process, nor earlier in the CSFR. Whilst regrettable, this is not wholly surprising as faith communities tend to be amongst 'hard to reach' groups. It is recognised that the CSFR has a limited remit and that the Inspector is unlikely to be persuaded to recommend that the terms of the CSFR are widened to address such deficiencies. However, the Trust would respectfully ask that the Inspector formally notes these concerns and recommends that the Council more fully addresses the social objectives of the NPPF at an early full review of the Core Strategy.

In the meantime, the Inspector is invited to reflect on the added importance of the model policy and the general presumption in favour of sustainable development in such cases where the Core Strategy is silent on the detailed provision of community infrastructure provision including for faith communities.

Chapter 3 of the CSFR will require minor textual changes to update references to the 'draft' NPPF to be replaced with the final NPPF. However, the underlying theme of 'Sustainable Development' under the Brundtland definition as set out in the UK SDS 'Securing the Future' aligns fully with the NPPF. In particular, the CSFR announces the five 'guiding principles'. We conclude that the CSFR complies with NPPF paragraph 151.

We would urge the Council to amend paragraph 3.3 to reflect the final wording of the NPPF, especially as it contains quotations. PPS1 has also been superseded and should be omitted from the revised text. Paragraph 3.5 should also be revised to accord fully with NPPF paragraph 14.

For all these reasons we would commend MSDC for embracing the principles set out in the draft NPPF which provide an excellent platform for minor amendments to ensure that the CSFR is compliant with the policies of the Framework. We conclude that the CSFR has had regard to national policy.

However, the CSFR fails to provide to clear unequivocal policy support needed to reflect NPPF paragraph 14. We conclude that modifications are necessary to make the CSFR sound as a result of the publication of the NPPF.

The Trust particularly welcomes the local commitment to 'Ensuring a Strong, Healthy and Just Society' and also to 'Sustainable Communities'. It is submitted that the NPPF clearly demonstrates national planning policy support for the need to embrace community social needs including new places of worship, in order to deliver these objectives in Mid Suffolk.

1.12 Does the CSFR sufficiently reflect the presumption in favour of sustainable development that Local Plans are expected to follow? Should the CSFR be modified to include the model sustainability policy? How would that affect policy FC1?

We submit that the CSFR does not sufficiently reflect the presumption in favour of sustainable development now expected of Local Plans. In addition to the textual changes needed to affect NPPF paragraph 14, the CSFR should commit the Council to the positive approach. This could be done by a revision which we suggest above, together with the national NPPF compliant model sustainability policy.

We submit that the model policy will stand alongside Policy FC1 as the model policy alone sets out a positive approach and a commitment to approval without delay; together with the adverse impacts test which is lacking in Policy FC1.

1.13 Whether the plan period is sufficiently clear throughout the CSFR, how that complies with NPPF and how it fits within the context of the original document. Whether there are any implications for cross-boundary working.

The Trust believes that there is a clear lack of clarity regarding the plan period wherein the housing policies and employment policies appear to be inconsistent. In its present form the CSFR appears to be unsound in this issue. We respectfully ask the Inspector to make appropriate recommendations to resolve the anomalies.

J R Shephard
on behalf of Bacton Gospel Hall Trust