

NATIONAL PLANNING POLICY FRAMEWORK**IN RELATION TO MID SUFFOLK DISTRICT COUNCIL'S
CORE STRATEGY FOCUSED REVIEW AND STOWMARKET AREA ACTION PLAN****Representation from Boyer Planning on behalf of Taylor Wimpey****1.0 Introduction**

- 1.1 The following representations are hereby made in response to the request from the Inspector for comments upon the National Planning Policy Framework (NPPF), including the Planning Inspectorate's proposed 'model policy', and "Planning policy for Traveller Sites".
- 1.2 These comments relate to the NPPF and proposed model policy and their implications for both Mid Suffolk District Council's Core Strategy Focused Review (CSFR) and Stowmarket Area Action Plan (SAAP) development plan documents. Specific consideration has been given to the presumption in favour of sustainable development, the newly framed policies on a range of topic areas and updated procedures related to Plan-making and examining Local Plans, including the 'tests of soundness'.
- 1.3 These comments are hereby presented on behalf of Taylor Wimpey in the context of their support for the proposed housing-led mixed use allocation at Chilton Leys.

2.0 The Presumption in Favour of Sustainable Development

- 2.1 It is noted that the Council has already sought to address the issue of establishing a definition of "sustainable development" within the CSFR, in response to the Draft NPPF. Clearly this now needs to be updated in light of the publication of the NPPF in its final form, not least in respect of removing references to PPGs and PPSs that have been cancelled (which will apply to both the CSFR and SAAP documents throughout).
- 2.2 It is considered that the inclusion of the five guiding principles of the UK Sustainable Development Strategy and to the three dimensions of sustainable development is broadly consistent with the final NPPF.
- 2.3 In quoting the details of the presumption in favour of sustainable development at Para 3.5 of the CSFR, however, it is acknowledged that the Council may wish to update the text, as it would clearly now be inappropriate to quote from a superseded version, albeit that the substance of this remains largely unaltered.
- 2.4 Consideration may also need to be given to inclusion of the model policy suggested by the Planning Inspectorate in order to embed this within the Development Plan, notwithstanding the fact that it should not be necessary to duplicate national policy



within such documents as a matter of best practice. It is acknowledged that the Council has alternatively sought to provide its own interpretation of how the policy would be applied at the local level. However, in doing so it is notable that the emphasis is shifted onto applicants needing to demonstrate accordance with this interpretation, and less on the obligation of Local Planning Authorities to plan positively and engage proactively with applicants to facilitate timely approval of sustainable development that is included in the NPPF and re-iterated in the model policy.

3.0 Delivering Sustainable Development

- 3.1 It is considered that the NPPF will have a number of further potential implications for policy areas relevant to both planning for housing and employment needs in the context of the CSFR and more site-specific considerations in relation to the SAAP. Our views on these issues remain broadly consistent with comments submitted previously in the context of the Draft NPPF and the SAAP (August 2011), but are restated here for the avoidance of doubt and in recognition that there are subtle differences between the Draft and final NPPF documents.
- 3.2 Stowmarket, as the principal settlement and service centre in the district represents the most sustainable location for growth in Mid Suffolk, and on this basis is acknowledged within the Adopted Core Strategy (2008) as the main growth area. This is reinforced through the CSFR, including reference at Para 4.4, and through the approach to delivery of growth at the town.
- 3.3 It is considered that both the Core Strategy (including the changes proposed through the CSFR) and proposed Stowmarket AAP present a package of growth, encompassing additional housing, employment and town centre improvements which represent sustainable development, and which capitalize upon the advantages offered by the concentration of development on the District's principal settlement. It is felt that this is consistent with the principles of the NPPF, and that the levels of housing and employment provision presented within these documents have been both objectively assessed, whilst also allowing for the required flexibility to accommodate needs arising from changing circumstances within the Plan Period and.
- 3.4 The Chilton Leys site is an essential ingredient of this strategy, and is itself both a sustainable location, as recognized within the Adopted Core Strategy and the subject of proposed development which can be considered sustainable. The scheme comprises much needed housing, including the potential to deliver affordable tenures, alongside employment space and community facilities, whilst the site is free from constraint, as set out within our separate representations to the Inspector in relation to the SAAP and in the context of the previous Core Strategy examination.



- 3.5 The Presumption in Favour, at Para. 14 of the NPPF places particular emphasis on the importance of an up to date development plan, and continues to place this at the heart of the planning system, alongside the importance of sustainable development. Progression of the CSFR to a satisfactory conclusion and adoption of the AAP will therefore enable the planned growth of Stowmarket to progress expediently and in the most appropriate manner, having been devised following substantial stakeholder participation.
- 3.6 Having reviewed the NPPF's stance on the preparation of Local Plans and policies on particular topic areas, under the "Delivering Sustainable Development" section, it is not considered that there is a great deal that would impinge upon the AAP as it is currently proposed.

Delivering a wide choice of high quality homes

- 3.7 This section places a notable emphasis on significantly increasing the supply of housing (para 47). Measures include a requirement to provide a rolling five year supply of housing plus an extra buffer of either 5% or 20%, depending on track-record of delivery of housing, putting the onus on Local Authorities to be proactive in ensuring flexibility and identifying additional housing in order to meet this new element. It is considered that the positive approach of the CSFR and SAAP accord with this requirement in respect of supporting growth at Stowmarket and making provision for meeting housing needs over the initial 5 year period, and in turn across the whole Plan Period and beyond.
- 3.8 It is considered that the AAP and the proposed allocation at Chilton Leys accords with the requirements to deliver community facilities and local services and to provide open space and recreational facilities. The ability for Local Plans to identify green areas of particular importance as 'Local Green Spaces' for protection is noted (para. 76). Whilst parallels may be drawn with Mid Suffolk's areas of Visually Important Open Space, regard should be had to the suggested criteria for its use, and to the requirement that such spaces should endure beyond the Plan Period. This would not therefore be appropriate, for instance, in relation to the Chilton Fields area of playing fields within the proposed Chilton Leys Allocation Site, where development within the Plan Period is clearly envisaged.

4.0 Plan-making

Local Plans and Evidence Base

- 4.1 It is noted that under the heading of 'Plan-making' the section on Local Plans requires a positive planning approach, covering a 15 year time horizon, but also taking account of longer-term requirements. The submission AAP is considered to accord with these requirements. The need to ensure that Local Plans are aspirational but realistic may have implications for application of the IDP, although it is felt that the AAP does acknowledge that flexibility will be required in order to take



account of the viability of development. The evidence base for the AAP is felt to be generally adequate and proportionate, addressing the topic areas outlined in an appropriate manner.

Examining Local Plans

- 4.2 Para 182 of the NPPF has introduced several new elements of procedure that must be examined by an independent inspector when testing the 'soundness' of submitted Local Authority plans. Inspectors must now assess whether the plan has been prepared in accordance with the 'Duty to Cooperate', and whether it has been 'positively prepared'.

Duty to Cooperate

- 4.3 Section 2.0 of the Inspector's Main Issues and Questions addresses the issues of the Duty to Cooperate, and this issue will therefore no doubt be discussed at the CSFR Hearing Sessions.

Positively Prepared

- 4.4 The NPPF has also revised the 'Tests of Soundness'. It has introduced the assessment of whether a document has been 'positively prepared'. It states:
"The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development."
- 4.5 As noted above the CSFR concentrates on providing a definition of 'sustainable development', and looks to justify increased housing numbers, and employment allocations. However, it does not specify in any detail the infrastructure requirements that would be associated with these increases of housing and employment development, which is rightly left to the SAAP.
- 4.6 Within representations to the SAAP Taylor Wimpey have previously raised concerns regarding the excessive scope of infrastructure requirements that have been identified within the Infrastructure Delivery Programme. It is understood that the Council will be looking to apply a flexible approach to prioritizing items in relation to which contributions will be sought, having regard to viability considerations, which would be welcomed. However it remains to be accepted that all of the items included in the IDP have been adequately justified and indeed objectively assessed. It is noted that the NPPF, from para 173, specifically deals with such matters, requiring consideration to be given to the viability of development.



5.0 Conclusions

- 5.1 It is considered that the CSFR has sought to respond positively to the NPPF, most notably through the inclusion of a locally derived interpretation of the term sustainable development that is nonetheless grounded in the principles established in the NPPF itself. The thrust of this is however focused too greatly on the onus for applicants to demonstrate sustainability credentials, needing also to acknowledge the role of the Council to proactively engage in the context of the presumption in favour as suggested within the Planning Inspectorate's model policy.
- 5.2 Overall the CSFR and SAAP accord with the provisions of the NPPF, being positively prepared in respect of seeking to meet the objectively assessed employment and housing needs of the District and the Stowmarket area in a sustainable manner. It remains questionable as to whether the infrastructure requirements specified within the IDP of the SAAP have indeed been objectively assessed, and consistent with the NPPF needs to have due regard to the viability implications upon development across the Stowmarket area.

Boyer Planning Ltd
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