

Mid Suffolk District Council Core Strategy Focused Review.

Representation on matters raised by the National Planning Policy Framework

Introduction

This representation is in response to the letter dated 18th April 2012 from the Programme Officer concerning representations on the matters raised by the National Planning Policy Framework (below, “the Framework”). It is further to the representation of La Ronde Wright Ltd (rep number CSFR-ProSub60) that policy FC2 of the Mid Suffolk District Council Core Strategy Focused Review (below, “the CSFR”) is unsound because it is not consistent with national policy.

The Framework has made the encouragement of the effective use of previously developed land part of the concept of sustainable development and requires local plans to be prepared with the objective of contributing to it. Local planning authorities are required to positively seek opportunities to meet the development needs of their area.

The Framework

Paragraph 14 of the Framework says that at its heart is a presumption in favour of sustainable development that for plan-making means that, among other things, “local planning authorities should positively seek opportunities to meet the development needs of their area” unless the adverse impacts “would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or specific policies in this Framework indicate development should be restricted.”

Paragraph 6 of the Framework says that the policies in paragraphs 18 to 219 of the Framework, “taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”

Paragraph 111 of the Framework says that planning policies should “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.” The same is stated verbatim as one of twelve core land-use planning principles in paragraph 17 of the Framework.

Paragraph 151 of the Framework says that “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”

Paragraph 182 of the Framework says that one of the elements of soundness of a Local Plan is that it “should enable the delivery of sustainable development in accordance with the policies in the Framework.”

Submission

To be consistent with the requirements to positively seek opportunities for meeting the area’s need for housing and to encourage the use of previously developed land, the reference to previously developed land in Key Service Centres in policy FC2 needs to be extended to refer to previously developed land that is well related in sustainability terms to a Key Service Centre. To restrict the search to previously developed land within the Key Service Centres is unsound.

1st June, 2012

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