

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: Mr M Crossley

INTRODUCTION

Mr Crossley is a resident of Old Newton and a local landowner. He has medium term aspirations to promote small scale residential development on the fringe of the settlement. On his behalf we have participated in the original Core Strategy process, the Stowmarket AAP process and currently in respect of the CSFR.

We welcome the opportunity to comment further following publication of the NPPF and the model planning policy.

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.

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 PPS1 has also been superseded and should be omitted from the revised text.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.

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.

Policy FC2 indicates revised housing growth “over a 15 year period from the date of adoption”. We have already made representations in respect of this terminology, which we submit will make accurate monitoring difficult and potentially a ‘black hole’ for housing provision with an unclear plan period. The final paragraph of Policy FC2 (see box on page 16) appears to imply that the base date for the 15 years period is in fact 2011. This would provide for a plan period to 2026.

In contrast, Chapter 5 ‘Employment’ refers to target job provision to 2026 and 2031 (paragraphs 5.10, 5.23 and 5.25). These two dates are carried forward into Policy FC3.

We conclude that there is a lack of clarity on the plan period within the CSFR.

It appears unlikely that the CSFR will be adopted prior to 2013 at the earliest. In order to comply with the NPPF the plan period should be at least 2028 in order to provide the minimum 15-year time horizon required by NPPF paragraph 157.

The original Core Strategy purported to define a spatial vision for Mid Suffolk to 2025 (see paragraph 1.6). The CSFR has not explicitly raised the plan period as an issue, and does not purport to amend either paragraph 1.6 or the Mid Suffolk Vision. This will lead to confusion towards the end of the plan period and in AMRs. For these reasons we submit that without appropriate changes the CSFR will be unsound. This may require further public consultation.

We conclude that it would be more satisfactory if the CSFR adopted a plan period to 2031 in order to plan for both housing and employment on the same basis. A commensurate increase in housing allocations should flow from this re-appraisal.

We respectfully ask the Inspector to make the appropriate recommendations.