

Proposed Main Modifications to the Mid Suffolk Core Strategy Focused review - Schedule of Representations

29 August 2012

Company	Given Name	Family Name	Position	Page	Policy/ Paragraph	Representations made	Officers Response
AlliancePlanning for Henley Property Investment	Christian	Holliday	Seinor Planning Consultant	Page 29	FC3	(...) <b>Comments on Existing Policy CS11</b> It is proposed in the Focused Review that Airfield B, which currently features as a specifically mentioned employment site in Policy CS11 (for B8 use), is not included in the table (table 6c) that accompanies the equivalent replacement policy, Policy FC3. If we had been given the opportunity to comment, we would have opposed this deletion on behalf of our client. Airfield B provides significant opportunity for the provision of additional employment land for the district and is located in a highly sustainable location, being able to make full use of the transport connections provided by the A140. Pre-application discussion with planning officers had been indicated that B1 and B2 uses would also be acceptable at this site. Please refer to our attached representations for further information on the site. <b>Comments on suggested Replacement Policy FC3</b> Informal discussions with panning policy officers have indicated that the sires put forward in the revised policy FC3 will provide only 4,000 jobs over the plan period, despite a target of 11,100 jobs by 2031 in the new policy. Under these circumstances it would be preferable for Airfield B to continue to be listed as a specific employment site. We therefore recommend Airfield B at Mendlesham is inserted into Table 6c of CS11 to give the added assurance that policy backing remains for the development of this important employment site. If the inspector accepts the Council's view that the site should be deleted from CS11/FC3, it should be made explicit that other non-allocated employment sites will be needed to make up the 11,000 jobs required by 2031. Our proposed wording of the policy are set out below. <b>Suggested Alterations to proposed Main Modifications</b> If our recommendation on the inclusion of Airfield B in Table 6c is not followed, we recommend that the following word are added after the end of the table 6c: 'It is recognised that the above sites will not on their own enable the Council to meet its employment goals over the plan period. Other sites suitable for employment uses will also be considered on their own merits and subject to normal development control criteria.' (...)	Airfield B was an anomaly from a previous round of Planning which appeared in the final plan along with two other sites. These unallocated sites were requested for removal by the Core Strategy inspector but inadvertently left in the document - without them having been formally considered. Development of the respondent's area may be assessed through a planning application process as this broad location is appropriate for the purposes of development.
Boyer Planning Ltd	James	Bailey	Associate	Page 6	SO3	We are satisfied with MM1 and the change in emphasis that the Council will 'seek to minimise its carbon footprint'.	Comments noted. No changes proposed.
Boyer Planning Ltd	James	Bailey	Associate	Page 10	Paragraph 3.11	We are also pleased with the inclusion of the model policy in MM2, as requested by the Inspector. The presumption towards sustainable development, and granting planning permission without delay unless there are material considerations otherwise, is seen as a fundamental to the NPPF. With MM2, we are satisfied with the removal of existing paragraphs 3.11-3.13, and with the insertion of the new 3.12 and 3.13. However, it is questioned whether 3.14 and reference to Policy FC1.1 is actually necessary.	Comments noted. No changes proposed.
Boyer Planning Ltd	James	Bailey	Associate	Page 11	FC1.1	Although it is interesting to see the 'Mid Suffolk approach to delivering sustainable development' as set out in MM4 (now being proposed as Policy FC1.1) it is unclear what purpose this will serve over and above the NPPF and existing 'saved' Local Plan policies and those in policies in the adopted Core Strategy. References to demonstrating the principles of sustainable development mentioned within the first paragraph are felt to be suitably contained within the NPPF. The references to protection of the local character are already dealt with in existing specific Local Plan / Core Strategy policies. The final paragraph makes reference to delivering sustainable development which is also covered by the NPPF, and the identification of delivery mechanisms appears to simple list the usual 'planning tools', therefore it inclusion is not necessary. It is felt that new paragraph 3.14 and Policy FC1.1 do not add anything further and are not necessary, and therefore should be removed.	Comments noted. No changes proposed.
Environment Agency	Neil	Dinwiddie	Planning Liaison Officer	Page 10-11	Paragraphs 3.11 - 3.13	We support the inclusion of text which sets out the need to ensure that development proposals are supported by the timely integration of any necessary social and environmental infrastructure.	Support noted. No changes proposed.
Environment Agency	Neil	Dinwiddie	Planning Liaison Officer	Page 11	Policy FC 1.1	We note that previous policy FC 1 is to be deleted (and replaced with a policy on the presumption in favour of sustainable development) and that an additional policy (Policy FC 1.1) is to be included. Proposed Policy FC 1.1 appears to incorporate the main messages from previous Policy FC 1. We support this policy as it retains the importance of pre-planning application discussions in ensuring that developments are only brought forward when there is the necessary physical, social and environmental infrastructure to support the proposal. This is an important element, particularly, but not exclusively, from a water quality and flood risk perspective. We support the inclusion of Policy FC 1.1.	Support noted. No changes proposed.
J & J Design (on behalf)		Bacton Gospel Hall Trust		Page 10	New paragraph 3.11	We welcome the proposed new paragraph incorporating new Policy FC1 which follows the model policy and provides clear unequivocal policy support consistent with the NPPF paragraph 14.	Comments noted. No changes proposed.
J & J Design (on behalf)		Bacton Gospel Hall Trust		Page 15	FC2	We welcome the proposed Main Modification which will provide a definite timescale.	Comments noted. No changes proposed.
J & J Design (on behalf)	Mr M	Crossley		Page 6	SO3	We support the Main Modification.	Support noted. No changes proposed.
J & J Design (on behalf)	Mr M	Crossley		Page 10	New paragraph 3.11	We welcome the proposed new paragraph incorporating new Policy FC1 which follows the model policy and provides clear unequivocal policy support consistent with the NPPF paragraph 14.	Comments noted. No changes proposed.
J & J Design (on behalf)	Mr M	Crossley		Page 10-11	New paragraphs 3.12 – 3.14	No objection.	Comments noted. No changes proposed.
J & J Design (on behalf)	Mr M	Crossley		Page 11	FC1.1	No objection.	Comments noted. No changes proposed.
J & J Design (on behalf)	Mr M	Crossley		Page 15	FC2	We welcome the proposed Main Modification which will provide a definite timescale.	Comments noted. No changes proposed.
J & J Design (on behalf)	Mr M	Crossley		Page 29	FC3	No objection to both Main Modifications.	Comments noted. No changes proposed.

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Land Planning Associates	Trevor	Dennington	Principal	Page 10-11	Policy 3.12	It is utterly inappropriate to seek to embrace within the status of a formal Development Plan Document like the Core Strategy the content of further unspecified documents termed "the SAAP (when adopted) plus any other plans and policies that may be adopted either singly or with Babergh" when the content of those documents has not been revealed or made available for public consultation. Therefore 3.12 should be limited to the text up to and including "as we know it", and all content after that( commencing "The Mid Suffolk Local Development Framework/Local Plan... " ) should be deleted.	The SAAP is referred to elsewhere in the Document but not fully explained in this its first mention in the Core Strategy Review. Suggest change to identify SAAP as Stowmarket Area Action Plan . The suggestion for text deletion would remove useful explanatory text.
Land Planning Associates	Trevor	Dennington	Principal	Page 11	Policy FC1	The Principles and three dimensions of Sustainable Development are clearly set out in 7 of the National Planning Policy Framework. They are unequivocal and there is no scope for those principles to be "interpreted locally through the policies and proposals of the Mid Suffolk Local Development Framework/Local Plan."  The LPA asserts that proposals for development must "conserve and enhance the local character of different parts of the district". The requirement for Conservation Areas (endorsed by a ruling of the House of Lords) is only that proposals must preserve OR enhance the character and appearance of the Conservation Area, ruled by the House of Lords (then the highest Court of Appeal in the UK) to mean "does no harm to".  Yet the LPA seeks here to inappropriately apply a higher standard to any and every area in Mid Suffolk than for Conservation Areas throughout the country - i.e. preserve AND enhance. That is unacceptable when NPPF 60 is clear that planning authorities should not seek to impose architectural styles or particular tastes and should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to a certain development form or styles and NPPF 65 is clear that LPAs should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape.	The opinions set out are noted - however the Localism Act and the NPPF do provide encouragement for more locally raised content.
Natural England	Janet	Nuttall	Planning and Conservation Advisor		general	Natural England has no substantive comments to make in relation to any of the proposed Main Modifications.	Comments noted. No changes proposed.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	References: A. CSFR main Mods dated 19 July 2012 B. Mid Suffolk Core Strategy (September 2008)  1. Offton and Willisham Parish Council (PC) wishes to partake, and have its views considered, in the consultation on the proposed main modifications to the Core Strategy Focused Review (FR) as invited at Reference A.	Comments noted. No changes proposed.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	2. The FR appears to be sound as far as it goes, and the PC can find little to criticise in what has been written; it is in the area of what has not been written that is of concern to the PC. The PC supports the proposed changes to the UK PPS (2005) and the forthcoming new National Planning Policy Framework (NPPF). In particular, the revised definition of 'sustainable development', with its '3Ps' categories of Prosperity, People and Places, makes understanding the basis of the NPPF easier for lay people.	Comments noted. No changes proposed.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	3. Due to the nature of the villages of Offton and Willisham, the PC's primary concern is within the People (social) element. These two villages host only small business interests, and environmental concerns, whilst important, are not a great issue for us within the context of the FR. Therefore within the four areas covered by the FR at page 5, our concerns are mostly contained within those listed at 1 and 3.	Comments noted. No changes proposed.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	4. Bullet point 2 to para 3.3 in the FR is where the PC focuses this response, and we direct our interest to the wording '...by providing an increased supply of housing to meet the needs of present and future generations...'. The PC fully supports this element of sustainable development; indeed, this is something that the PC has pushed for since 2008. Countryside villages do require limited housing development to meet local needs. Without additional housing, the pressure build-up for rural housing will distort house prices upwards making it ever more difficult for first and second time buyers. Small countryside villages will slowly become the preserve of retired and wealthy people, and this is not desirable. It is the question of 'how' that is important.	Comments noted. No changes proposed.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	5. The PC is at an advanced stage in the preparation of its Parish Plan (PP). We delivered a comprehensive questionnaire to every household in the two villages, and we received back 70% that were fully completed. The results of those questionnaires were analysed by Suffolk Acre on our behalf, and a public meeting was held in our new village hall where the results were displayed, and to which parishioners were asked to prioritise. This will provide the basis of an Action Plan to be undertaken by the PC in due course. A final copy of the Parish Plan will be produced within the coming month that will be delivered to every household, MSDC and other interested bodies. The PC takes its role and the needs and views of its parishioners very seriously, and considers this to be vital especially within the Localism era.	Comments noted. No changes proposed.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	6. Within the PP process, parishioners were asked about housing in the two villages. Results show that by a majority of approximately 2:1, parishioners would support some small housing development as and when need of individuals require additional housing and the proposed site was considered to be appropriate. Offton and Willisham are both 'countryside villages' as defined in Reference B. The limitation for development within such villages is clearly defined at Policy CS2. This policy provides security from green field encroachment by developers that is highly desirable, but in itself, CS2 is too restrictive, too 'black and white', and allows no room for the application of common sense.	Comments noted. A future review for a shared approach from Mid Suffolk / Babergh may take this comment into account.

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Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	7. The FR rightly focuses on Stowmarket for future development, and this is where some 58% of all new housing in the next 15 years is planned to be. But there is a whole lot of mid Suffolk, indeed the majority of the geographical area, that is patch worked by rural villages in the Secondary Village and Countryside Village classes. This is where the CS2 restrictions noted at para 6 are at variance to the majority wishes of rural communities to which MSDC serves and owes its support. As shown at para 5 above, this is certainly the case for the PC.	Comments noted. A future review for a shared approach from Mid Suffolk / Babergh may take this comment into account.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	8. The PC considers that the bullet point noted in para 4 should be applied to all communities in mid-Suffolk, so that if an appropriate planning application for a residential house was to be submitted to MSDC, the Planning Committee would be able to consider that PA on its merits, and not purely against the 'black and white' statement in Policy CS2. There should, however, be no presumption of building rights. Surely, this is what Localism means; surely the local parish council is in the best position to state whether any particular PA meets the needs of the parish it serves, surely MSDC planning committee should be allowed to apply an element of common sense whilst remaining cognisant of the wider planning issues.	Comments noted
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	9. The FR does nothing to address the planning concerns of so many people in the borough served by MSDC. The PC respectfully asks that the Policy CS2 be reviewed and 'softened' so that some in-fill development may, in the right circumstances, be allowed within what formally constituted a village settlement boundary. Such boundaries served a successful purpose prior to 2008 by protecting agricultural and green land, and similar arrangements could continue to do so for many years to come.	The additional "flexibility" sought may only be delivered with a major change of approach in the Core Strategy. The Core Strategy Focused Review was meant to focus on those changes to bring the Stowmarket Arera Action Plan into conformity with the Core Strategy. More major changes, of the type suggested, will need to be assessed as part of a full review.
Offton and Willisham Parish Council	Jane	Double	Parish Clerk		general	10. We also note that annual house completions in mid Suffolk between 2001-2011 averaged just 420, yet the East of England Plan for 2001-2021 shows that mid Suffolk still needs to build an average of 430 housing units per year during 2006-2021. In the current difficult economic climate and on-going banking crises, which was not with us during that earlier period 2001-2008, this may prove to be a very difficult target. Many small developers are regularly finding it difficult to raise required funding. Thus, some in-fill house building in Secondary and Countryside Villages by private money may assist MSDC in achieving its house building aim.	Noted - please see above.
PegasusPG	Gabrielle	Rowan	Associate		MM1	no comment	
PegasusPG	Gabrielle	Rowan	Associate	Page 10	Policy FC1	We welcome the modification to Policy FC1 to include the model sustainability policy as that would assist in the clarification and definition of sustainable development and how this is to be interpreted by the Core Strategy Focused Review.	Comments noted. No changes proposed.
PegasusPG	Gabrielle	Rowan	Associate	Page 10-11	Paragraphs 3.11 - 3.13	The inclusion of these additional paragraphs is supported as they provide an appropriate context to Policy FC1.1. In proposed paragraph 3.13 when the masterplan/development brief approach is mentioned, it may be useful to cross reference to the development brief that have already been prepared for the proposed sites and will form part of the Stowmarket Area Action Plan.	Comments noted. No changes proposed.
PegasusPG	Gabrielle	Rowan	Associate	Page 11	Policy FC1.1	The inclusion of this additional policy is supported. Again, it may be useful to include reference to the existing development briefs that have been prepared for the proposed allocated sites in Stowmarket that will be included within the Stowmarket Area Action Plan.	Comments noted. No changes proposed.
PegasusPG	Gabrielle	Rowan	Associate		MM5	no comment	
PegasusPG	Gabrielle	Rowan	Associate	Page 15	Policy FC3	Support	Support noted. No changes proposed.
PegasusPG	Gabrielle	Rowan	Associate		MM7	no comment	
Residents of Farriers Road, Millers Close and Weavers Close	Sue	Leigh		Page 10	Policy FC1	We applaud the reference to sustainable development and therefore by default Mid Suffolk District Council must be stating that it will NOT approve any planning proposals which will be to the detriment of environmental issues in any given area.	Support noted. No changes proposed.
Residents of Farriers Road, Millers Close and Weavers Close	Sue	Leigh		Page 10-11	Paragraph 3.12/3.13	The contents of these paragraph suggests that Mid Suffolk District Council has accepted that it has a duty to apply components of sustainable development, local considerations and local participation to any proposal. Failure to incorporate any or all of these elements would place Mid Suffolk District Council in breach of its own policy.	Comments noted. No changes proposed.
Residents of Farriers Road, Millers Close and Weavers Close	Sue	Leigh		Page 11	Policy FC 1.1	We are delighted that Developers will have to demonstrate (and not assume) the principles of sustainable development.	Comments noted. No changes proposed.
Residents of Farriers Road, Millers Close and Weavers Close	Sue	Leigh		Page 29	Policy FC3	It is noted that the Mill Lane Phase 2 has been amended to Medium/Long Term. It would appear that Mid Suffolk District Council is disregarding its own suggested policies on sustainability by intending to allow housing development prior to the creation of employment, thus causing the working population of Stowmarket to continue to travel the A14 corridor to their workplace. This approach will be in contradiction of MSDC's strategic objective S03 – minimising carbon footprint.	The Council wishes to phase the development of the Mill lane proposal to ensure that employment land is released more quickly than previously suggested.
Wetheringsett cum Brockford Parish council	Lynne	Cockerton			general	<i>Biomass energy producers claim that burning straw is carbon neutral in that the CO2 absorbed from the atmosphere in the growing crops is released back into the atmosphere when the straw is burned. This is FALSE. It actually causes a significant increase in the carbon footprint. The CO2 absorbed by the growing crops actually offsets the CO2 released by the agricultural process i.e farm machinery involved in ploughing, tilling, sowing, spraying, harvesting and transporting the crops. The straw is either ploughed back into the soil directly or used in the livestock industry and latter as fertiliser on the fields. Thus the CO2 is contained within the land and contributes to the carbon neutrality of farming. If the straw is burned, all the CO2 from the agricultural process is no longer offset and therefore adds to the carbon footprint of Suffolk, and also that (readily available data shows) that the burning of 1 million tons of straw releases 56000 tons of CO2 into the atmosphere. The carriage of the straw by the fleet of lorries will add a further 2% of that total CO2. This is a huge increase in the carbon footprint and the need for daily travel up to 30 miles to collect the straw hardly qualifies as a sustainable travel pattern. To put it into perspective, a 40MW biomass energy generator will provide electricity for 65000 homes. Each of those homes will actually be adding nearly a ton of CO2 into the atmosphere on a regular basis and will completely negate the efforts to reduce the household carbon footprint by using low power bulbs, lower wash temperatures etc.</i>	Comments noted. No changes proposed.
	Sue	Bull				no comments	