

Mid Suffolk District Council Core Strategy Focused Review.

Statement concerning the use for housing of previously developed land that is sustainably related to Key Service Centres

Introduction

1. This statement is further to the representation of La Ronde Wright Ltd (representation number CSFR-ProSub60) that policy FC2 of the Mid Suffolk District Council Core Strategy Focused Review (below, “the CSFR”) is unsound.
2. The priority given to the use of previously developed land and the increase from 50 dwellings on previously developed land in Key Service Centres in the core strategy to 300 are welcomed.
3. However, by omitting the use of previously developed land that is not within a Key Service Centre but is well related to a Key Service Centre in sustainability terms, the CSFR is unsound because it is not consistent with national policy in the National Planning Policy Framework (below, “the Framework”) as it (i) restricts the identifiable supply of developable sites for housing in area action plans jeopardising the supply of housing and (ii) fails to encourage the reusing of previously developed land.
4. The availability of such land for 300 dwellings is not founded on a precise evidence base. To ensure the justification and effectiveness of policy FC2, the range of sites available for allocation needs to be extended to include previously developed land that is not within a Key Service Centre but is well related to a Key Service Centre in sustainability terms.
5. In paragraph 2.5 of appendix 2 of the CSFR is a presumption that all outstanding planning consents at the end of 2009/2010 will be completed within six years. It is not supported by evidence. It is very unlikely to be true. The shortfall that it is likely to create could be addressed, at least in part, by the availability for allocation of previously developed land that is not within a Key Service Centre but is well related to a Key Service Centre in sustainability terms.

Inconsistency with the Framework

6. 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.”

7. 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.”

8. Paragraph 47 of the Framework says that “to boost significantly the supply of housing, local planning authorities should” among other things identify a five year supply of housing (plus a buffer) and identify sites or broad locations for housing growth for the following five years and, where possible, the five years after that.

9. 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.

10. 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.”

11. 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.”

12. 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 each Key Service Centre risks shortfall in both previously developed land reuse and housing allocation. It is unsound for failing to be consistent with the Framework.

Justification and Effectiveness

13. Paragraph 4.15 of the CSFR gives the nature of factors that have been taken into account in the revised estimate of future potential housing on previously developed land. However this is not all shown to be based on robust and credible evidence as only partial information about available sites is given in the supporting evidence. This risks a shortfall in sites coming forward. To that extent, the plan is not sound.

14. As mentioned above, in paragraph 2.5 of appendix 2 of the CSFR is a presumption, used in the housing trajectory, that all outstanding planning consents at the end of 2009/2010 will be completed within six years. It is not supported by evidence. It is very unlikely to be true. It is not an established fact that all permitted dwellings are always built. Even those that are to be built are subject to the current recession and general shortage of funding which may delay their completion. The use of that presumption in the housing trajectory on which the housing needs were assessed for the CSFR makes the CSFR unsound.

Submission

15. For the reason in paragraph 13 of this statement, adding within policy FC2 previously developed land that is not within a Key Service Centre but is well related to a Key Service Centre in sustainability terms would increase the availability of sites for selection for allocation in area action plans and thereby make the CSFR more likely to be effective.

16. The shortfall that it is likely to be created by the false presumption identified in paragraph 14, above, could be addressed, at least in part, by the availability for allocation of previously developed land that is not within a Key Service Centre but is well related to a Key Service Centre in sustainability terms.

17. The likelihood of the delivery of the priority of use of previously developed land would be improved, and the plan would therefore be more sound, if the figures for housing on previously developed land in Key Service Centres were expressed as minimum targets rather than estimates.

18. For the above reasons and for consistency with the Framework, it is submitted that to be sound policy FC2 should be amended by the following.

(a) An extra sentence should be added: "previously developed land that is well related in sustainability terms to a Key Service Centre may be considered as part of the Key Service Centre notwithstanding that it is not within it." In practice, that sustainability will inevitably require access to employment sites and so the sentence could alternatively be in the extended form: "previously developed land that is well related in sustainability terms to a Key Service

Centre and to nearby employment sites may be considered as part of the Key Service Centre notwithstanding that it is not within it.”

(b) After the third paragraph should be added an extra sentence: “The figures in this table are targets for delivery and, in the case of previously developed land in Key Service Centres, minimum targets.”

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