

Local Plan Part 1 – Joint Core Strategy

Representation ref. 30024 by John Pilkington

Further comments arising from the final NPPF and the Council's proposed modifications to the Local Plan Part 1

On 9 March 2012 I made a representation on the Pre-Submission Joint Core Strategy in connection with Policy WT3 for Bushfield Camp.

I said that the Council had not put forward any evidence, in Paragraphs 3.33 to 3.40 or elsewhere, to justify such a departure from Policies WT1, MTRA4, CP18 and CP19. I maintained that by undermining these policies Policy WT3 would render them ineffective as far as the Bushfield site was concerned. I also thought it likely that Policy WT3 would be inconsistent with national policy in the form of the emerging National Planning Policy Framework, in particular Paragraphs 128–131 and 167 of the July 2011 draft.

For these and other reasons I argued that the proposed Local Plan Part 1 was unsound.

As you know, the final version of the NPPF was published on 27 March 2012 and the modified Joint Core Strategy was submitted on 18 June 2012.

Paragraphs 128–131 and 167 of the draft NPPF were replaced by Paragraphs 73–77 and 114–116 in the final version. The requirements of the draft were strengthened by the insertion of a new paragraph (Paragraph 75), which additionally required planning policies to “protect and enhance public rights of way and access”.

The City Council modified Policy WT3 slightly in the submitted Joint Core Strategy, and added a new paragraph on Page 43 to illustrate delivery more clearly.

My further comments are:

My references to Paragraphs 128–131 and 167 of the draft NPPF should be replaced by Paragraphs 73–77 and 114–116 of the final version.

The Joint Core Strategy's proposed new paragraph clarifying how Policy WT3 would be delivered in no way meets my original objections. Meanwhile the draft NPPF's requirement to deliver and improve access to open space has been strengthened with the addition of a further paragraph in the final version. Therefore for my original reasons, as amended above, I argue that the submitted Local Plan Part 1 remains unsound.

For your information, the Bushfield Town or Village Green application, whose uncertain outcome I argued in my previous representation made Policy WT3 premature, is still awaiting a decision.



John Pilkington, 28 July 2012