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Dear Miss Graham,

Re: Rochford Core Strategy Examination: Implications of draft NPPF

Thank you for the opportunity to submit comments on the implications on the Rochford District Core Strategy of DLCC having issued a consultation draft of the National Planning Policy Framework. The Council's comments are set out below.

Weight

As noted in the advice note produced by the Planning Inspectorate for use by its Inspectors in relation to the NPPF consultation draft, the current draft is a consultation document and is therefore subject to potential amendment. The same publication notes that the draft NPPF is capable of being considered a material consideration, but the weight to be given to it will be a matter for the decision maker in each particular case.

In this respect, it is pertinent to note the precedent set by the Inspector conducting the examination into the Lancashire Minerals and Waste Site Allocation and Development Management Policies DPD. The Inspector wrote to participants in the examination (via the Programme Officer) and stated: "Whilst this [NPPF] is a draft document it can carry only little weight" (copy of letter available at <http://www.lancashire.gov.uk/corporate/web/viewdoc.asp?id=72823>)

It is also relevant to note that DCLG's recent *National Planning Policy Framework: Myth-Buster* publication emphasises the fact that the current draft NPPF is a consultation draft, demonstrating that the final version has yet to be determined.

The final content of the NPPF is far from clear. Nevertheless, the draft NPPF does provide an indication of the Government's direction of thinking in relation to planning.

Rochford District Core Strategy and Planning Principles in the draft NPPF

Firstly, in addition to the current draft NPPF being merely a draft, it should also be noted that it proposes that Development Plans be “consistent with the objectives, principles and policies set out in this Framework”, as opposed to being in conformity to them.

It would not be appropriate to consider the Core Strategy against the detailed policies within the NPPF at this juncture, given that the latter is merely in draft form at this stage.

Whilst the planning principles are also only in draft form and subject to consultation, they are perhaps less likely to change than the detail of the policies within the NPPF.

In this respect, at the heart of the draft NPPF is the presumption in favour of sustainable development. Likewise, the concept of sustainability and sustainable development is fundamental to the Rochford District Core Strategy, as evidenced through the Sustainability Appraisals of the document.

The draft NPPF is clear that planning system is to remain plan-led and that Local Planning Authorities should ensure local plans are in place as soon as practical. This element of the draft NPPF further emphasises the importance of ensuring the Core Strategy is adopted in a timely fashion, as the Council is seeking to do, in order to give certainty about development in the District and to enable control to be exercised over unplanned, unwanted development proposals.

The draft NPPF also makes clear that local plans should plan positively for development required in the area, meeting need identified through a proportionate evidence base, whilst ensuring that areas of environmental quality are protected. In this regard, it is important to note that the Core Strategy sets out a positive strategy for the development of the District (including housing, employment and retail), supported by an evidence base, whilst accounting for the environmental constraints to which the District is subject.

It also particularly pertinent in the case of Rochford District to note that the NPPF, as existing national planning policy, continues to place great importance on Green Belt and avoiding inappropriate development within it. The Core Strategy seeks to ensure the vast majority of the Green Belt is retained, supporting the key principles for identifying a Green Belt, and only allowing Green Belt to be allocated for development in order to satisfy an objectively identified need (as supported by the draft NPPF) and where it is sustainable to do so (again, as supported by the draft NPPF).

In summary, whilst the final content of the NPPF remains unknown, it is clear that the Rochford District Core Strategy is consistent with its overarching objectives contained within the consultation draft.

Yours sincerely,

Samuel Hollingworth
Planning Policy Team Leader