

Councils Response to Inspectors Initial Questions Friday 24th May 2019

19. Question 19

PART 4, paragraph 8(2) of The Town and Country Planning (Local Planning) (England) Regulations 2012 says “A local plan or a supplementary planning document must contain a reasoned justification of the policies contained in it” (my emphasis). Is there a reason why this Plan contains no reasoned justification for the policies?

19.1. There is a succinct, focussed, concise and accessible reasoned justification within the draft Local Plan at paragraphs 1.1 to 3.1. Further succinct and concise reasoned justification has been provided to individual policies where considered necessary.

19.2. The Council has complied with relevant legislation and has followed the approach requiring succinctness as set out in the NPPF at paragraph 15:

The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area...

19.3. The Council has also complied with approach requiring Plans to be “as focussed, concise, and accessible as possible” as set out in the PPG:

What should a plan look like?

While the content of plans will vary depending on the nature of the area and matters to be addressed, all plans need to be as focused, concise, and accessible as possible.

Paragraph: 002 Reference ID: 61-002-20190315.

19.4. This positive approach to embracing the Government’s clear direction requiring succinctness and concision has been a feature of the draft Local Plan production. This has been set out in PPC reports, including most directly in June 2018:

Draft Local Plan for Publication (Regulation 19 stage) consultation – recommendation to June Cabinet

...

4.8 As noted at PPC in May 2018, the direction of travel from the Government and the Planning Inspectorate is that they support an approach to Local Plan drafting that is very focussed and concise. A general aspiration has been mentioned by some for ‘a 50 page Local Plan’.

4.9 Deliberate choices have been made to restrict the draft Local Plan to the essential questions. These are the ‘what, where, when, how’ questions and the detail that will enable the public, stakeholders, Councillors, applicants and Development Management officers to be clear as to what will and will not gain permission. There will be further supporting information to aid the Inspector at Examination.

19.5. Whilst only informal, in discussions with MHCLG officers and members of PAS at events in 2017 and 2018 this ‘succinct and concise draft Plan and reasoned justification’ approach was considered potentially acceptable.