Re: Homework item N2.11 – Detailed Wording of SDL Policies (N2.34)

It is our understanding of the discussions that took place during the hearing session on the 1st November 2013, that concerns were raised regarding the wording of the SDL policies, and in particular the requirement for a masterplan for the whole SDL to be submitted and agreed by Council before any application can be made. In effect the policy would require a new tier of Council approval outside of the formal planning application process. Potentially significant delays could occur whilst masterplans are being approved even before an application is submitted and we believe this raises issues regarding deliverability, which would have a knock on effect in terms of being able to achieve the objectives of Policy SP2. The Council were asked to review the wording in light of this.

The amended wording of the SDL Policies (Policy Stafford 2, 3, 4 & Policy Stone 2) now proposed by the Council requires a masterplan for the whole SDL to be produced “by all parties involved in the development” and then “agreed by the Council prior to applications being determined”. In our view the proposed change to the wording would represent backward step if the aim is to ensure that the SDLs are not burdened by the introduction of an onerous new layer of approval(s).

We do of course understand the Council want to ensure that the SDL’s come forward in a cohesive manner, that delivers the various policy requirements for that particular SDL. However, so long as the housing, employment, environmental, transport, design and infrastructure requirements are clearly set out in policy, then it is entirely within the Council’s gift to ensure that any component of the SDL that comes forward delivers these objectives through the planning application process.

From a developers perspective the requirements outlined (in Policy Stafford 2, 3, 4 & Policy Stone 2) set clear parameters which would influence the masterplanning process and thus inform any planning application. If the Council felt that Policy requirements were not being satisfactorily delivered then they would have the power to influence this through the development management process. Nonetheless, given the scale of the sites coming forward the likelihood is that applicants would be expected to give consideration to cumulative impacts under separate EIA regulations.

In light of the above, we believe that the requirement for any form of masterplan for the whole SDL to be agreed prior to an application being submitted, or determined should be removed from the wording Policy Stafford 2, 3, 4 & Policy Stone 2.

Kind regards,

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