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My Ref : TRLDF/CS/E/NPPF
Your Ref :
Date : 18 August 2011
Contact : Mr Renato Messere
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Department : Community & Environmental Services

Dear Mr Snarr,

Three Rivers Core Strategy Examination – Consultation on the Draft National Planning Policy Framework

This letter sets out the Three Rivers District Council response to the Inspector's invitation for comments on the implications of the consultation draft of the National Planning Policy Framework for the Core Strategy Examination.

The draft National Planning Policy Framework (NPPF) is capable of being a material consideration, and clearly sets out the Government's overall objectives for the planning system. However, given that it is a draft and that there may be significant amendments to the detailed provisions, the Council considers that the weight that should be attributed to the detail of the draft NPPF at this time is limited.

Nevertheless, the Council has assessed the Core Strategy against the overarching principles set out in the draft NPPF and considers that the Core Strategy is in conformity with these overarching principles.

The draft NPPF sets out the Government's key economic, social and environmental objectives and the planning policies to deliver them. There is a presumption in favour of sustainable development and local planning authorities should plan positively for new development.

The Core Strategy Spatial Vision, Strategic Objectives, Spatial Strategy and Policy CP1 set out the local approach to promoting sustainable development and ensure that where development meets the local requirements for sustainable development, it will be supported. Policy CP6 of the Core Strategy proactively plans for the sustainable growth of the Three Rivers economy by supporting development that sustains parts of the District as attractive areas for business location and that provides for jobs. The Core Strategy also specifically supports opportunities for economic development in South Oxhey as part of plans for the regeneration of the area.

Paragraph 19 of the draft NPPF sets out the core planning principles that should underpin both plan-making and development management. The Core Strategy is consistent with all of these objectives and supports their implementation at the local level. It provides a practical framework within which decisions on planning can be made with a high degree of certainty and efficiency.

The Core Strategy sets a positive long-term vision for Three Rivers with a stated priority to plan for growth required to support local communities and provide for their needs. The Core Strategy seeks to meet the development needs of Three Rivers and sets out a clear strategy for the allocation of land to meet needs, except where the adverse impacts of meeting these needs would significantly and demonstrably outweigh the benefits.

Core Strategy policies encourage efficient use of land and mixed use development where appropriate whilst also seeking to protect and enhance the natural, built and historic environment. Core Strategy objectives seek to reduce impacts on the environment by reducing waste, pollution and energy consumption, by promoting the use of renewable energy and the conservation of water resources and by designing development to take into account future changes to the climate. The Core Strategy also consistently seeks to reduce the need to travel by locating development in accessible locations and promotes buildings and public spaces of a high enduring design quality.

The Core Strategy includes policies to deliver all of the strategic priorities listed in paragraph 23 of the draft NPPF, and makes provision to address all of the requirements for local plans set out in paragraph 24. The Core Strategy has benefitted from early and meaningful engagement with Three Rivers communities and will contribute to the delivery of community strategy objectives.

The Core Strategy is fully consistent with the draft NPPF policies on business and economic development, transport, communications infrastructure, minerals, housing, design, sustainable communities, green belt, climate change, flooding and coastal change and the natural and historic environment, while providing additional local guidance and interpretation where relevant.

The Council therefore considers that the Core Strategy is consistent with the overarching principles and objectives of the draft NPPF, and provides a practical framework within which decisions on planning in Three Rivers can be made with a high degree of certainty and efficiency.

Consequently, the Council strongly believes that there should be no requirement for any change to the Core Strategy as a result of the publication of the draft NPPF.

As set out in paragraph 21 of the draft NPPF, local plans may be reviewed in whole or in part to respond flexibly to changing circumstances, and therefore there is potential to review or supplement the Core Strategy if required to take into account any changes when a final version of the NPPF is issued as national policy.

If any further information of clarification is required, please do not hesitate to contact me.

Yours sincerely,

Renato Messere
Head of Development Plans