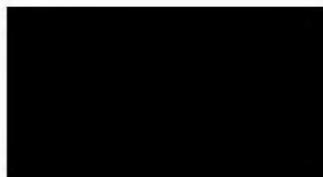


Addendum LDP

From :



Response to MIR Addendum (2014) for LDP 2016

Q1. SPATIAL FRAMEWORK FOR WIND

I accept that any survey of all Shire settlements following publication of the SPP '2 km' criterion would delay submission and adoption of the LDP, but nevertheless believe that it should be done. (We are, after all, talking about a document covering many years, give or take small amendments along the way.)

That delay might amount to as much as one complete year in the LDP timetable, the reaction to which may well be – on the part of both policy planners and elected members – that such is not to be contemplated. The reaction of the Executive would almost certainly be the same, but that view is not relevant when perhaps 20 other LDPs are all at differing stages of progress.

I submit, however, that this delay of, perhaps, a year **COULD** comfortably be accommodated for the following reason :

The LDP which is the subject of this consultation is a continuation of, and merely a tweaking of, the extant LDP adopted in 2012. At the time of this new MIR much was made of the fact that the new LDP would build on and continue the broad thrust of the 2012 Plan with minimal changes. The result is that policy directions basically remain the same, with proposed changes simply refining and clarifying the extant LDP. Even, for example, where a new policy has been proposed, all the most important elements which would go to make up that policy already exist within the current Plan.

It would be perfectly possible, therefore, to extend the life and the remit of the 2012 Plan without in any way interfering with the Shire's short- or medium-term intentions as expressed through the 2012 Plan's Vision, Aims and Policies.

I further submit that for the Shire to hand over powers of investigation and assessment to developers is to abrogate its responsibility in the matter and' effectively to hand over to a third party matters of development control in what is now, more than ever, a very contentious, controversial area of policy – that of onshore wind.

For the avoidance of doubt ; for the local authority - in effect - to pass such development control to a third party would not be lawful.

In support of my contention (that the Shire is effectively handing powers of decision and control to developers), consider this :

If a developer were to seek to build, say, a shopping centre, he would be asked to conduct an assessment of need, for which he would commission a consultant's survey. Under what circumstances would any such survey ever say... 'there is no need..' ? None, I submit : the developer wishes to build, he finds a site, he selects the assessor, he secures the result he desires.

That scenario is, in my opinion, virtually identical to that which would be faced by the Shire over the '2 km' assessments. For the Shire to rely wholly on the developer's and consultant's altruism and

impartiality would be absurdly naive, **but the temptation to do so and to accept their findings without further investigations would be overwhelming.** That is especially so when one considers the conditions of austerity (and therefore pressure on staff) under which councils are, and will be, working, combined with a probable increase in the number of turbine applications. The number of applications is already high and will surely increase significantly now that the Executive's new SPP effectively creates 'open season' on onshore wind.

The temptation to rely on developers' documents must be resisted : the only certain way to avoid either biased investigations or lethargic acceptance is for the Shire to conduct the surveys itself.

Q4. HOUSING LAND SUPPLY

For the Shire to maintain in full the previous allocation of land for housing is a position which is to be welcomed. I fully support that preferred option.

If the original allocations are retained, the required 5-year supply will easily be exceeded and the result will be to give extra flexibility to the Shire whenever unexpected difficulties arise with constraints or delays with allocated sites.

It will also effectively negate the weasel words of developers who seek to apply pressure to both the Planning Service and the elected members to adopt those developers' 'Non-preferred' bids. The arguments of these developers and landowners (when submitting such non-recommended bids as a normal planning application) has been, during the life of the extant Plan, that

..'the Shire is short of its target housing numbers owing to the delay in major projects, but we can generously assist in getting you out of this hole by providing our 50/80/100 houses VERY QUICKLY..' (or words to that effect)

This has always been disingenuous special pleading disguised as public-spirited altruism while actually designed to push developers' pet schemes. With a 6+ year land supply, the Shire will be able confidently to dismiss any further such claims, safe in the knowledge that it has the flexibility afforded by having plenty of choice in the 'surplus' allocations capable of being brought forward. The Shire can also, therefore, keep faith with its Plan.



SUBMISSION No.	26
ISSUES RISED	
1	3
SUPPORTING DOCS	