

FOCM MIQ Response – Matter 12



Friends of Carrington Moss
Matter Number 12

Matter 12 Delivering the Plan

Policy JP-D1 – Infrastructure Implementation

Q12.1. Policy JP-D1 starts by stating “to make this happen we will ...” Is it sufficiently clear what the purpose of the policy is and what criteria 1-9 are seeking to achieve? Is a modification required to ensure the plan is effective in this regard?

The Policy appears to be aiming to put in place a framework for implementation of the developments that will follow the approval of this Plan. To ensure the key objectives of the Plan are met within the implementation programmes, this Policy should be robust and demanding otherwise it will be ineffective.

The Policy should be modified to address the following:

- Climate emergency action plans are not mentioned as key documents at paragraph 12.2.
- Residents are not mentioned as a key stakeholder at paragraph 12.3. It is unreasonable that the people most affected by the delivery of the Plan are excluded from involvement in its implementation.
- Criterion 7 of the Policy should be amended to ensure that development does not lead to increased local flooding, carbon emissions or air, noise or light pollution.
- The KPIs at page 394 of the Plan are weak in relation to the infrastructure implementation requirements and should particularly include monitoring to ensure there is no increased flood risk and no increased carbon emissions or air, noise or light pollution as a consequence of new developments.

Word Count: 179

Q12.2. a) Are all criteria in policy JP-D1, in particular 1-4, 8 and 9, clear and unambiguous such that it is evident to a decision maker how they should react to development proposals? In addition, how would local authorities be expected to have regard to these criteria in preparing district local plans? b) Is the proposed modification to criterion 3 necessary for soundness?

- a) Criterion 1 should be updated to clarify the purpose of the Policy and to confirm that the Policy will be applicable to Local Plans and all Planning Applications.

Criteria 2, 5 and 8 should be updated to include engagement with impacted residents.

FOCM MIQ Response – Matter 12



Criterion 9 should be strengthened to **require** the provision and use of shared resources.

Criterion 3, 4, 6 and 7 – see paragraphs below

- b) Criterion 3 should not be weakened, as proposed in the modification. This would result in the Policy being ineffective.

Word Count: 86

Q12.3. Is criterion 4 of policy JP-D1 justified and consistent with the relevant legislation on planning obligations and national policy, particularly NPPF 34 and 56-58?

To comply with NPPF paragraph 34, Criterion 4 should be modified to clarify what exactly is included within “*transport and site specific infrastructure*” and explicitly state how each will be funded.

If any aspect of the development is not incorporated within this Criterion, such as green spaces, active travel, public transport, etc, the wording should be amended to reflect such requirements and how each is expected to be funded. Where public funding is required to support implementation, the Policy should verify how the benefits gained by that spend will be measured. Where funding will be provided from other sources, this should be clearly and transparently set out, along with confirmation that other prerequisites will not be impacted (such as funding for Affordable Housing).

Word Count: 123

Q12.4. a) In referring to ‘strategic sites’ does criterion 6 of policy JP-D1 relate only to allocations in the Plan or is it intended to refer to any site identified as ‘strategic’ in district local plans? b) Is the proposed modification to criterion 6 necessary for soundness?

- a) The Policy should be modified to confirm it applies to all strategic sites, both within this Plan and within Local Plans.
- b) The Policy should not be modified to weaken the requirements as this will render it ineffective.

Word Count: 39

Q12.5. Is criterion 7 of policy JP-D1 justified and consistent with national policy? In particular:

FOCM MIQ Response – Matter 12



a) Do any aspects of the criterion duplicate other statutory or regulatory regimes for the provision of utility infrastructure and is the criterion consistent with NPPF 56-58 and relevant legislation in terms of planning obligations?

b) How do requirements in this criterion for full fibre digital connections and decentralised energy networks relate to policies JP-C2 and JP-S3 respectively?

Please see our response to Q12.1 above.

Word Count: 7

Total Word Count: 434

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss