Dear Ms Waye,

SKDC SAP – ADDITIONAL MATTERS – BROWNFIELD LANDS – NATIONAL PLANNING POLICY FRAMEWORK

Our Chamber has in its representations made on 18th November 2011 set out its views on the matter of utilizing brownfield land in preference to greenfield land. Since then in March 2012 the National Planning Policy Framework has been published.

This states under Core Planning Principles at Page 6 the following:

- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

It also states under the heading Conserving and Enhancing the Natural Environment at paragraph 111 on Page 26 the following:

111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

These statements do not reflect new legislation, policy or guidance. In fact these statements reflect well established and long existing principles and policies of English Town and Country Planning.

This work by SCOT has shown that SKDC’s proposed allocation of Stamford sites cannot be substantiated in terms of the National Planning Policy Framework, and pre existing principles and policies in respect of the requirement to give priority to developing brownfield land ahead of greenfield land.

Stamford: The Finest Stone Town in England
As a result, the methods used in the selection of sites for allocation renders the SAP unsound. It is not 'Justified' as:

A. The sites selections are not the most appropriate “strategy” when considered against the reasonable alternatives.

B. One reasonable alternative, that proposed by SCOT, has not even been considered for inclusion in the selection process.

Furthermore, the SAP is unsound as it is not “consistent” with National Policy.

We invite the SAP Inspector to consider these points which we think render the SAP unsound.

Yours sincerely,

Eg. Gilman

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For Stamford Chamber of Trade & Commerce

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