

15 August 2011

To all Suffolk Councillors – Notice of key change in policy with significant impact

Dear Councillor,

Coalition Government Consultation Draft of National Planning Policy Framework (NPPF) – Responses by 17 October 2011

I am writing to you on behalf of the Suffolk Preservation Society to highlight a current key consultation by the Government. This involves a fundamental change to the national policies against which development and local plans will be considered in the future. At present a series of themed documents known as Planning Policy Statements (PPS) and the preceding generation of Guidance Statements (PPG's), set out how the planning system should strike a balance between the many competing interests. These documents are very detailed and contain much wisdom gleaned over many decades of planning practice. The current system has effectively mediated the wider national and private interests successfully and has been admired internationally as fair and democratic.

The proposed revisions would reduce the many thousands of pages of detailed guidance to only 52 pages. Inevitably this process has resulted in the loss of much valuable detail. Furthermore, the new guidance proposes to change the very purpose of planning to one focused on promoting economic growth through development. Under the new NPPF the default answer to development would be 'yes' where there is no relevant up to date local plan. Far from handing back planning powers to local communities, instead there will a requirement for local plans to conform to this national policy document and the new generation of Neighbourhood Plans would have to do likewise. Communities would only be able to promote more development, not less, through their Neighbourhood Plan. Surely this flies in the face of localism?

The Coalition Government promised to get rid of the old top-down housing targets imposed by unelected regional government. Instead, the NPPF now imposes upon Councils a duty to provide more housing supply with a challenging target to make an additional allowance of at least 20%. This is combined with the disappearance of targets to preferentially develop 'brownfield' land rather than 'greenfield' sites. Office development has also been removed from the categories of development that should first be preferentially directed to town centres. This will undermine urban regeneration whilst encouraging out of town schemes. This harm could be reinforced by removing the national ceiling on parking provision with the result that car use could increase; at a time when we are all trying to reduce greenhouse gas emissions.

The Society is concerned that these fundamental changes could have damaging unforeseen consequences for the environment. Moderate environmental charities including the National Trust and CPRE have voiced serious concerns for the future of our towns, villages and countryside unless the defects identified are addressed in the

final document. We urge you as an elected representative of your community to scrutinise the draft and make your views known to the Government. We appreciate that you may not be a planning 'expert' but hope that you will read the document and what other bodies are writing on this important issue. In order to help you access this information we have provided links to relevant documents below.

In conclusion, our concerns include:

- The over allocation of land for new housing [1]
- Loss of focus on brownfield land regeneration [2]
- Weakening of 'town centre first' preference for office development [3]
- Undue focus on growth rather than communities and the environment [4]
- Danger of increased car use by lifting parking ceilings [5]
- Abolition of rural exceptions policy for affordable housing [6]

If you decide to write to the Government, please send us a copy as we are interested to hear your views. We hope that you found our letter helpful and will consider joining us (<http://www.suffolksociety.org/aboutus/default.htm>).

Yours sincerely



Simon Cairns
Director

Useful links:

Please send responses before 17.10.2011 to Alan C Scott, Department for Communities and Local Government - National Planning Policy Framework, Zone 1/H6, Eland House, Bressenden Place, LONDON SW1E 5DU Telephone: Alan C Scott 0303 4441665 Or by e-mail: planningframework@communities.gsi.gov.uk

The Draft NPPF: <http://www.communities.gov.uk/publications/planningandbuilding/draftframework>
The Government Consultation Document:
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/1951747.pdf>

Read what others are saying:

CPRE: www.cpre.org.uk/media-centre/latest-news-releases/item/2392-radical-planning-shake-up-threatens-green-fields & <http://www.cpre.org.uk/magazine/opinion/item/2369-planning-system-under-attack>;
National Trust: http://www.nationaltrust.org.uk/main/w-chl/w-countryside_environment/w-planning-landing.htm ; Royal Town Planning Institute: <http://www.rtpi.org.uk/item/4731/23/5/3>

Notes: [1] Draft NPPF p.30 [2] Draft NPPF Impact Assessment p.95 [3] Draft NPPF p.45 [4] Draft NPPF p.3 [5] Draft NPPF Impact Assessment p.39 [6] Draft NPPF Impact Assessment p.97

The SPS is an independent, non-political environmental charity committed to sustainable and locally distinctive development that respects the identity of Suffolk. Please find out more about us at: <http://www.suffolksociety.org.uk/> We are entirely funded via voluntary donation by individuals.