

10 October 2011

Mr Alan C Scott,
Department for Communities and Local Government
National Planning Policy Framework Response,
Zone 1/H6, Eland House, Bressenden Place,
LONDON
SW1E 5DU

e-mail: planningframework@communities.gsi.gov.uk

Dear Mr Scott,

Coalition Government Consultation Draft of National Planning Policy Framework (NPPF) – Response by the Suffolk Preservation Society

1. I am writing to you on behalf of the Suffolk Preservation Society ('the Society') to submit representations in response to the Government's draft NPPF. The Society has campaigned for over eighty years for sustainable, locally distinctive development that responds to local need. The Society has a positive approach to development and is supportive in principle of a consolidated national policy framework. However, the Society believes that it is essential that the primacy of the development plan is respected as the means for identifying local need and spatially directing development to sustainable locations.
2. The Society objects fundamentally to the assertion that the principal purpose of the planning system should be the promotion of economic growth. Whilst this is clearly an issue of national importance at the current time; even in such circumstances it remains but one of a complex web of pertinent environmental considerations. Such balance should form the cornerstone of the planning process in order to ensure that we leave a positive legacy for future generations. The current system has effectively mediated the wider national and private interests successfully and has been admired internationally as fair and democratic. But there is inevitably scope for reform. However, the Society does not accept the premise that a permissive planning system would serve to stimulate economic growth. Such an approach has been taken in the Republic of Ireland and Greece and the economic and environmental implications have been catastrophic.
3. The Society believes that the NPPF should simplify and unify the existing system to positive effect. However, we submit that this aim has simply been taken too far with a resultant loss of much valuable policy detail. Furthermore, under the new NPPF the default answer to development would be 'yes' where there is no relevant up to date

conform to this national policy document and consequently the new generation of Neighbourhood Plans would have to do likewise. The Society believes this flies in the face of the new localism agenda that the Society supports.

4. 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%. In the Society's opinion this is arbitrary and unjustified. Local plans will be required to provide an adequate housing land supply supported by a robust evidence base. This figure will be subject to much scrutiny. The proposed 20% increase in supply is unrelated to demand and employment opportunities and thus inherently unsustainable. The Society believes that this initiative will consequently serve to undermine the fledgling Localism initiative.

5. In the Draft NPPF 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. In the opinion of the Society 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 NPPF does not provide adequate protection for employment sites that represent the seeds of future national prosperity. The Society believes that such sites should be 'reserved' by the NPPF for the medium term, in the wider national interest by preventing their loss to alternative uses in the short term. The Coalition Government has repeatedly stated that we need to rebalance the national economy. The Society is very supportive of such moves and believes that protecting allocated or established employment sites is fundamental to this process by providing locally based employment opportunities to facilitate sustainable economic growth. This in turn may justify and deliver housing growth, but not vice versa.

6. The Society is concerned that these fundamental changes could have damaging unforeseen consequences for the environment. In conclusion, our concerns include:

- The over allocation of land for new housing [1]
- Loss of focus on brownfield land and 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]

7. The Society suggests the following revisions are made to the NPPF in the national interest:

(i) Acknowledging the broader purpose of planning: Securing the long term public interest in the development and use of land. If we must have a presumption in favour of development, then let us ensure that it is in favour of **sustainable economic development** to prevent exploitation;

(ii) Recognise the intrinsic value of the countryside to society and the environment and afford it a **presumption in favour of protection:** Not just designated areas and Greenbelt;

(iii) Reinstate the brownfield first policy and ensure protection is given to employment sites and allocations to promote regeneration and the efficient use of land by creating a sequential presumption in favour of the re-use of PDL;

(iv) Reinstate the primacy of the development plan and introduce appropriate transitional arrangements to avoid 'free for all';

(v) Re-define sustainable development in terms that acknowledge that the environment has a finite capacity that must be respected, as opposed to giving primacy to economic growth.

8. The Society hopes that the Government grasps this opportunity to address the shortcomings identified and to ensure that the NPPF is effective in the national interest. We await the outcome of the consultation process in due course

Yours sincerely



Simon Cairns
Director

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. Patron: Lord Tollemache - the Lord Lieutenant of Suffolk.