

National Planning Policy Framework

Consultation questions

We are seeking your views on the following questions on the Government's proposal for a new National Planning Policy Framework.¹

Email responses to: planningframework@communities.gsi.gov.uk

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

Zone 1/H6, Eland House,

Bressenden Place

London

SW1E 5DU

(a) About you

(i) Your details

Name:	Clare Churchill
Position:	Parish Clerk
Name of organisation (if applicable):	Fovant Parish Council
Address:	Clerk to Fovant Parish Council 1 Tower Farm Cottages, Quidhampton. Salisbury. SP2 9AA
Email Address:	fovantpc@btinternet.com
Telephone number:	01722 743027

(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response



Personal views



¹ (see: <http://www.communities.gov.uk/publications/planningandbuilding/draftframeworkconsultation>)

(iii) Are your views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group.

Yes

No

Name of group:

Fovant Parish Council

(iv) Please tick the *one* box which best describes you or your organisation:

Private developer or house builder

Housing association or RSL

Land owner

Voluntary sector or charitable organisation

Business, consultant, professional advisor

National representative body

Professional body

Parish council

Local government (i.e. district, borough, county, unitary, etc.)

Other public body (please state)

N/A

Other (please state)

N/A

(v) Would you be happy for us to contact you again in relation to this consultation?

Yes

No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

(b) Consultation questions

Delivering Sustainable Development

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

1(a) – Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

1(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 15-18 (Presumption in favour of development): This paragraph as written is not acceptable as it conflicts with paragraphs 19-20 (Localism) and paragraphs 22-23 (Neighbourhood Planning) which should take precedence. Additionally paragraphs 15-18 should be considered in conjunction with the requirements of paragraphs 28-29 (Housing), paragraph 34 (Natural Environment) and paragraph 35 (Protection of Green Areas) as referred elsewhere in this submission. For the avoidance of doubt, the term ‘sustainable development’ should be given a written legal definition.

Paragraph 24 (Duty to co-operate): This paragraph is not acceptable as it conflicts with the legal duty of Parish and Town Councillors, District, County and Unitary Authorities to honestly reflect the views of their electors within their communities. The term ‘constructive engagement’ as written in the draft document implies that where a developer submits an application, the first duty of the elected representative will be to pro-actively support the developer whether or not the developer’s proposal conflicts with the Neighbourhood Plan, Village Design Statement, Village Plan, or the Unitary/County Council’s own agreed and published Core Strategy Plan.

Paragraphs 28-29 (Housing): The proposed Housing plan is flawed as written it appears to assume that a ‘rolling’ programme of housing development can continue indefinitely into the distant future with little or no impact on the landscape, natural environment or on sites identified for special protection. Paragraph 29 takes no account of the inevitable fact that at some point in the future there will be a need to restrain or cease development of those areas where saturated by commercial development.

We believe that the Core Strategy Plans current or in progress should identify the limits of land availability – and that once those limits have been identified, no further development should be permitted.

Since 2009 Fovant Parish Council has been engaged with the Wiltshire Council in the formation of the South West Wiltshire Core Strategy Plan and the Wiltshire Core Strategy Plan and has made representations to the Planning Inspectorate during the Public Examination process. Fovant Parish Council made written and oral submissions to Wiltshire Council and at the Public Examination with respect to forecast development up to year 2026; taking into account the fact that the village of Fovant is at the centre of the Cranborne Chase and West Wiltshire Area of Outstanding Natural Beauty (AONB), with two village Conservation Areas, areas of Housing restraint, an area of special open space, areas of special scientific interest and archaeological interest as well as historic monuments, the Parish Council rejected the imposition by Wiltshire Council of ‘Secondary Village’ status requiring acceptance of sig-

nificant increase to housing development (circa +20% of current build), as the village does not comply with the stated criteria for such status. Fovant Parish Council accepts that continued development within or adjacent to (for affordable local housing projects) the existing Housing Policy Boundary should continue. Parish Council does not accept that there should be a presumption in favour of development.

Paragraph 30-31 (Viability): This paragraph as written is flawed as it does not seem to recognise that for certain sensitive areas there cannot be any permitted development without adverse impact.

Paragraph 32 (Environment): The proposed commitment to be the 'greenest government ever' is childlike in its naiveté and lack of awareness of likely adverse impact; this 'commitment' should not form part of the planning process where its compulsion would require devastation of the landscape, natural environment and/or impose unequal and burdensome costs on both industry and the tax-payer as compared to other nation states meeting other internationally agreed standards.

Paragraph 33 (Renewable Energy): We do not agree that there should be a presumption in favour of developments for the purposes of commercially developed renewable energy particularly for 'wind-farm' developments across important landscapes where such equipment is incapable of producing consistent levels of renewable energy without subsidy or where additional carbon-using power stations are also required for back-up. We would support developments for additional nuclear generation where such are co-located with existing units, suitable long-term waste disposal is available and where subsidies are limited to capital construction but not to operating costs.

Paragraph 34 (Natural Environment white paper):

We believe that the protection and enhancement of the natural environment should take precedence over the current temporary economic demands of paragraphs 15 and 16 (Presumption in favour of development) and Paragraphs 28 and 29 (Housing) for the simple reason that all land is finite and that when despoiled it would not be possible to replace or repair it. We do not believe that the current year 2011 economic crisis, the temporary governmentally self-induced population increase, or the erroneous belief that current building levels is mainly due to the planning process alone, should be used to form the basis of a permanent planning policy for England; any National Planning Policy Framework should be based on a legitimate and properly considered definition of 'sustainability' taking into account current and future infrastructure loading, with flexible adaptation reflecting the availability of financing, employment availability and the cost and availability of public transport from residential areas to places of work, community facilities such as schools, GP surgeries, hospitals and retail centres.

Paragraph 35 (Protection of Green Areas): This paragraph should specifically extend protection to those areas of Special Open Spaces, Areas of Housing Restraint, views within, into and out of Conservation Areas and AONBs or other park lands, Listed buildings, sites of archaeological interest, and sites of high ecological value.

Paragraph 37 (Documents to be cancelled): we believe that important aspects of the following documents should be retained as an appendix to the NPPF:

Planning Policy Statement: *Delivering Sustainable Development*

Planning Policy Guidance 2: *Green Belts*

Planning Policy Statement 5: *Planning for the Historic Environment*

Planning Policy Statement 7: *Sustainable Development in Rural Areas*

Planning Policy Guidance 14: *Development on Unstable Land*

Planning Policy Guidance 17: *Planning for Open Space, Sport and Recreation*

Planning Policy Guidance 18: *Enforcing Planning Control*

Planning Policy Statement 23: *Planning and Pollution Control*

Planning Policy Guidance 24: *Planning and Noise*

Planning Policy Statement 25: *Development and Flood Risk*

Letter to Chief Planning Officers: Implementation of *Planning Policy Statement 25 (PPS25) – Development and Flood Risk*

Letter to Chief Planning Officers: *The Planning Bill – delivering well designed homes and high quality places*

Letter to Chief Planning Officers: *New powers for local authorities to stop ‘garden- grabbing’*

Letter to Chief Planning Officers: *The Localism Bill*

General Comments: We have concerns about the draft National Planning Policy Framework (NPPF) and the proposed changes to the planning system.

As a Parish Council we have had much experience in the methods of working the present planning system; in our Parish we have supported small local developments throughout our village where they have the quality of design, material and build characteristics which harmonise within the existing village scene and do not harm our village conservation areas, SSSI and special areas of open space. This is always an important part of our considerations as our village is located in the centre of the Cranborne Chase and West Wiltshire AONB. We are not a NIMBY council and have never been opposed to small well designed homogeneous housing, including affordable housing, development for local people and economic growth - often fighting hard, mostly to little avail, when endeavouring to retain our rural infrastructure (Post Office, pubs, Telephone Boxes and local businesses).

We sincerely believe growth should not be at the expense of the countryside and the vitality and character of our small villages, market towns and medieval cities. In its current form the draft NPPF (although mercifully much shorter than the existing plethora of planning regulations) has insufficient detail to ensure that sustainable development will deliver the quality in development that will be environmentally, socially and economically acceptable in the long term. The NPPF requires modification to ensure that it:

- Defines the term 'sustainable development' by listing minimum criteria that must be met before development can proceed (for example requiring development to be located where existing (or new planned) infrastructure is in place to service the new community (roads, public transport access to access the amenities, shops, post offices, schools, water, sewerage, gas, electricity, etc. and so that environmental limits are respected, rather than giving primacy to simply economic development;
- Recognises the intrinsic value of the unprotected countryside which covers more than half of England, and set out stronger policies to protect the Green Belt and specially designated areas (i.e. AONBs and Conservations Areas and views into and out of them, Special areas of open space within villages and small towns, designated housing restraint areas and areas of special scientific interest;
- Retains the 'brown field first' policy so that land is used efficiently by ensuring previously developed land is used before green field sites;
- Promotes the delivery of affordable housing for rent to local people, social housing for rent and low-priced housing for rent/part- rent/purchase in the commercial market in appropriate locations to meet identified need, particularly in rural areas.

- Retention of some of the important (and still relevant) guidance detail suggested for cancellation under Paragraph 37 of the NPPF;
- ensure that the Local Planning Authority Core Strategy Plan and Local Neighbourhood Plans are given precedence when considering non-strategic development applications;
- allow local planners to say 'no' to damaging and inappropriate development;
- ensure the countryside as a whole is protected from damaging development - not just our best landscapes; and
- give local planning authorities the ability to require the re-use of previously developed land before building on green field sites.

We are encouraged to read in the national press that the Government are inclined to incorporate the views, suggestions and ideas put forward by those who have read and make submissions to the Government's Consultation Document. We look forward to viewing a copy of a revised NPPF document after the Government has taken the necessary steps to ensure that national planning policy is amended to guarantee the promotion of genuine sustainable development.

Plan-making

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

2(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

2(b) Do you have comments? (please begin with relevant paragraph number)

We believe that your question relates to paragraph 13 viz: "*Local and neighbourhood plans and policy should be prepared having regard to the content of national planning policy. But there will be local circumstances where it is right for that community to depart from national policy. These circumstances would need to be justified by robust evidence.*"

We do not believe that this constitutes definitive clarification of the tests required for soundness.

The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

2(c) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

2(d) Do you have comments? (please begin with relevant paragraph number)

We believe that this aspect is meant to be covered under paragraph 14; “ *The Framework covers a broad span of national planning policy. In many areas, policy has been streamlined but the core approach and principles remain in place. Below we discuss the main areas where a new approach is being introduced.* ”

We do not think that this provides sufficient clarity.

Decision taking

In the policies on development management, the level of detail is appropriate.

3(a) Do you agree

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

3(b) Do you have comments? (please begin with relevant paragraph number)

We believe that this aspect is meant to be covered under paragraph 16; *The Government’s top priority in reforming the planning system is to promote sustainable economic growth and jobs. A positive planning framework is also critical to the provision of the infrastructure which underpins a successful modern economy, including the progressive decarbonisation of the energy generation and distribution system. The Chancellor made clear in this year’s Budget the Government’s expectation that the answer to development and growth should wherever possible be ‘yes’, except where this would clearly conflict with other aspects of national policy.* We do not think that this provides sufficient clarity.

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

4(a) Do you agree

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

4(b) What should any separate guidance cover and who is best placed to provide it?

We refer to our comments against paragraph 37; we believe that the existing guidance (as listed) should be retained centrally by government where applicable.

Business and economic development

The 'planning for business policies' will encourage economic activity and give business the certainty and confidence to invest.

5(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

5(b) Do you have comments? (please begin with relevant paragraph number)

We note that developers have a large and unused 'land-bank' with planning permissions under existing planning consents at present – the new policy will not improve the rate of housing build if developers are not confident to invest.

5(c) What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

The economy requires stabilisation; this means the elimination of government debt. We do not believe that the planning for business policies as stated in the NPPF will encourage economic activity 'on its own' as other more important considerations would necessarily be a precursor to economic activity i.e. improved long-term economic outlook, availability of capital and investment funding to businesses, and availability of full-time permanent employment to secure an acceptable level of credit-worthiness and availability of affordable financial loans to potential house-buyers.

The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.

6(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

6(b) Do you have comments? (please begin with relevant paragraph number)

Transport

The policy on planning for transport takes the right approach.

7(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

7(b) Do you have comments? (please begin with relevant paragraph number)

The Transport Policy appears to rely on 'commercially driven' provision which has failed to deliver affordable and reliable public transport to rural areas; this acts as a barrier to 'sustainable development of residential housing in rural areas. The policy would appear to restrict future 'sustainable development' to existing town and city 'hubs' only.

Communications infrastructure

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

8(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

8(b) Do you have comments? (please begin with relevant paragraph number)

Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

9(b) Do you have comments? (please begin with relevant paragraph number)

Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

10(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

10(b) Do you have comments? (please begin with relevant paragraph number)

The proposed Housing plan is flawed as written, it appears to assume that a 'rolling' programme of housing development can continue indefinitely into the distant future with little or no impact on the landscape, natural environment or on sites identified for special protection. Paragraph 29 takes no account of the inevitable fact that at some point in the future there will be a need to restrain or cease development of those areas where commercial development has saturated the area or impact damage will arise. We believe that the Core Strategy Plans current or in progress should identify the limits of land availability – and that once those limits have been identified, no further development should be permitted. We believe that the current guidance on quality for homes should be retained.

Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

11(b) Do you have comments? (please begin with relevant paragraph number)

Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

12(b) Do you have comments? (please begin with relevant paragraph number)

We believe that the current guidance on design quality and materials for homes should be retained.

Green Belt

The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.

13(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

13(b) Do you have comments? (please begin with relevant paragraph number)

We believe that this policy should extend protection to those areas of Special Open Spaces, Areas of Housing Restraint, views within, into and out of Conservation Areas and AONBs or other park lands, Listed buildings, sites of archaeological interest, and sites of high ecological value.

Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

14(a) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(b) Do you have comments? (please begin with relevant paragraph number)

The policy on renewable energy will support the delivery of renewable and low carbon energy.

14(c) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(d) Do you have comments? (please begin with relevant paragraph number)

We support developments for renewable energy where such are either located off-shore or are co-located with existing units and where subsidies are limited to capital construction but not to operating costs. We would not support renewable energy sources which require the building of carbon-based back-up units.

The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities.

14(e) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

14(f) Do you have comments? (please begin with relevant paragraph number)

We believe that Local Authority Cores Strategy Plans, Town/Village Design Plans and Statements, together with Neighbourhood Plans to be raised under the Localism Bill should take precedence. We believe that development of renewable energy sources should not be allowed to harm the natural environment and important but should be sited off-shore. The requirements of paragraphs 28-29 (Housing), paragraph 34 (Natural Environment) and paragraph 35 (Protection of Green Areas) should continue to apply for strategic renewable development.

The policy on flooding and coastal change provides the right level of protection.

14(g) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(h) Do you have comments? (please begin with relevant paragraph number)

Natural and local Environment

Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.

15(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

15(b) Do you have comments? (please begin with relevant paragraph number)

We believe that the protection and enhancement of the natural environment should take precedence over the demands of paragraphs 15 and 16 (Presumption in favour of development) and Paragraphs 28 and 29 (Housing) for the simple reason that all land is finite and that when despoiled it would not be possible to replace or repair it.

Historic Environment

This policy provides the right level of protection for heritage assets.

16(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

16(b) Do you have comments? (please begin with relevant paragraph number)

We believe that the protection of the historic environment, including views into and out of such places should take precedence over the demands of paragraphs 15 and 16 (Presumption in favour of development).

Impact assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

We have insufficient knowledge of and information relating to this subject matter.

Planning for Travellers

18 Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

We have insufficient knowledge of and information relating to this subject matter.

Specific questions on the impact assessment

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

We believe that the assumption that that existing Planning Law is the cause of the current low level of house building is fundamentally untrue; there is a large land-bank retained unused by current developers who have chosen not to proceed with work due to other financial and economics restraints which causes lay outside the Planning Law.

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

We have insufficient knowledge of and information relating to this subject matter.

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

As unpaid volunteers we have insufficient knowledge of and information relating to this subject matter.

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

We have insufficient knowledge of and information relating to this subject matter.

QA5: What behavioural impact do you expect on the number of applications and appeals?

We would anticipate large numbers of anticipatory planning applications being submitted by Developers whether or not relating to land-owned by themselves, principally to circumvent existing or currently in progress Local Authority Core Strategy Plans. We would anticipate that few if any of the approved applications would be put into immediate work but would simply be held pending improvement of the present economic environment – during the ‘pending period’ local homes and other development schemes would be ‘blighted’.

QA6: What do you think the impact will be on the above costs to applicants?

We believe that there would be little additional cost to applicants from that of the existing system, principally because the developers could prepare such anticipatory planning using existing overheads. Costs to Local Authorities and local communities would rise disproportionately to deal with the increased number of applications and to prepare submissions against unwelcome and ill-thought out developments encouraged under this draft NPPF.

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

Use of the NPPF in its current form would effectively disenfranchise local communities from the Planning Policy related to their area, giving virtual control to outside developers.

The Localism Bill would be seen as a sham.

The Government (MPs and Civil Service) would be seen as party to an undemocratic process – with no available way to legitimately object to unwelcome development, it is not unlikely that ordinary members of the public would increasingly revert to ‘direct action’ means of protest and confrontation with both developers (and their supporters), the government and local authorities, the police and the courts.

QB1.1: What impact do you think the presumption will have on:

- (i) the number of planning applications;
- (ii) the approval rate; and
- (iii) the speed of decision-making?

If the NPPF is adopted in its present form:

- (i) We would anticipate large numbers of anticipatory planning applications being submitted by Developers whether or not relating to land-owned by themselves
- (ii) The approval rate to achieve 99%
- (iii) The decision making to reduce to <20 days

QB1.2: What impact, if any, do you think the presumption will have on:

- (i) the overall costs of plan production incurred by local planning authorities?
- (ii) engagement by business?
- (iii) the number and type of neighbourhood plans produced?

If the NPPF is adopted in its present form:

- (i) The overall costs of plan production would increase initially to comply with the NPPF; thereafter in recognition that the presumption is always yes, further controls would be largely abandoned
- (ii) Developers would engage to secure application approvals
- (iii)** When seen to be useless, the requirement for 'Neighbourhood Plans' would disappear.

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

- (i) Economic: Very little.
- (ii) Environmental: adverse
- (iii)** Social: adverse

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

When seen to be useless, the initiation of 'appeals' would disappear and would probably be replaced with 'direct action' protests.

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

We have insufficient knowledge of and information relating to this subject matter.

QB2.2: Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

We have insufficient knowledge of and information relating to this subject matter.

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

We have insufficient knowledge of and information relating to this subject matter.

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

We have insufficient knowledge of and information relating to this subject matter.

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

We have insufficient knowledge of and information relating to this subject matter.

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

Our best guess is that less development would occur on brown field sites (whether or not they already have planning permissions) as it would be less expensive to buy green fields and develop those. WE would not recommend removing National Targets for housing on brown field sites as they are more 'sustainable'.

QB3.2: Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

The requirement is naive as it takes no account of the inevitable fact that at some point in the future there will be a need to restrain or cease development of those areas where commercial development has saturated the area or impact damage will arise. We believe that all Core Strategy Plans current or in progress should identify the limits of land availability – and that once those limits have been identified, no further development should be permitted.

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

The current policies for 'social' affordable housing arising out of commercial developments should be changed to permit 'rent' only

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

The current policies for rural affordable housing for local people should be retained unchanged.

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

We have insufficient knowledge of and information relating to this subject matter.

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

We have insufficient knowledge of and information relating to this subject matter.

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

We have insufficient knowledge of and information relating to this subject matter.

QB4.1: What are the resource implications of the new approach to green infrastructure?

We have insufficient knowledge of and information relating to this subject matter.

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

We have insufficient knowledge of and information relating to this subject matter.

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

We have insufficient knowledge of and information relating to this subject matter.

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

We have insufficient knowledge of and information relating to this subject matter.

QB4.5 Will your approach to renewable energy change as a result of this policy?

We have insufficient knowledge of and information relating to this subject matter.

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?

We have insufficient knowledge of and information relating to this subject matter.