

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

Date: 6th October 2011  
My ref: LAFF/NPPF  
Your ref:  
Contact: Roy Denney  
Phone: 0116 2338604  
Fax:  
Email: accessforum@leics.gov.uk

## **Draft National Planning Policy Framework**

We cannot fault the intent to greatly simplify the present unwieldy and complex planning system and much of the intent laid out in the material produced sounds fine. It is, by implication, what is not said that is of concern. Even more problematical is the transition period which developers might exploit.

Some limited national guidelines are important to ensure that planning decisions reflect genuine national objectives. We think that the protection of green belt and green wedges should be part of such national objectives.

Beyond this we do feel it important to allow local authorities and communities to have a say in planning matters, but again, they must be given time to produce their own plans before applications are entertained based on anticipated changes in guidelines.

If we have understood matters properly, where any planning authority has not yet completed its local development plan, then applicants will almost certainly be given permission. Many planning authorities are some way from completing the bureaucratic multiplicity of stages of consultation needed to put local plans in place, not helped by their current straightened circumstances. Introduction of your planned changes too rapidly might leave a gap through which developers will stampede. We feel more time should be allowed to planning authorities before any changes take effect. A deadline will focus their attention but it has to be an achievable one.

The Framework talks of maintaining Green Belt protections and protection for Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific etc., and sets out a new right for local communities to protect green areas of particular importance locally. This is exactly what we would wish to see.

However it is what happens before the local authorities complete the exercise of creating their development plans which greatly concerns us. There is talk that where plans are not in place or up-to-date, development should be allowed unless this would compromise the key principles for sustainability in the Framework, including protecting the Green Belt and Areas of Outstanding Natural Beauty. This is fairly vague and worryingly loose.

Leicestershire Local Access Forum, c/o Travel Choice & Access, Leicestershire County Council,  
Dept Environment & Transport, Room 700, County Hall, Glenfield, Leicestershire LE3 8RJ  
Telephone: 0116 305 7086  
Email: accessforum@leics.gov.uk

Roy Denney, Chairman of the Access Forum

[www.leics.gov.uk/laf](http://www.leics.gov.uk/laf)

It hardly seems sensible or in the public interest, to allow short term development which would interfere with plans which in the most part are nearly complete, if not finalised

We are also concerned that the "presumption for development" will mean developers no longer have to justify any new building but that objectors will have to prove projects would be too damaging. Given the difficulty of small groups or individuals in funding major disputes through the system, this seems inequitable. We also trust that despite the wish to speed up the process, notice of applications will still be posted giving adequate time and opportunity to respond.

Conservation areas and historic sites must continue to be protected; England has a very special landscape, in all of which tourism is of immense value to the country. If unsuitable growth is allowed, countryside will become extended suburbia and the tourist income will be lost to future generations. It might well also leave towns as ghetto areas, only inhabited by those who cannot afford to move out, as has happened in much of the United States.

Also of concern is the loss of emphasis on brown field regeneration as developers will always go for the soft option and build on green field sites. Perhaps the tax regime could be used to help in this area. If VAT were charged on new build on green field sites but not on brown field, whilst pushing up the price of some properties, it would focus the mind on maximising use of brown field sites. Home improvements adding bedrooms; therefore increasing the housing stock, could also be VAT exempt.

Another area where an exemption could be considered would be for a small increase in the housing stock for a community with few smaller properties, thereby enabling retired couples or widow(er)s to downsize without leaving their community and also, to provide starter homes, again keeping a community together.

We accept the need for more housing if the population is going to be allowed to keep growing at the current rate. We also feel the system could be simpler but would ask that more thought be given to the actual strategic objectives and the transition period, so that planning is better suited to protecting the shape and nature of landscapes in the country we all know and love.

Roy J Denney, Chairman of the Access Forum