

WIRRAL SOCIETY

The Wirral Committee of the Campaign to Protect Rural England

Founded 1928 – Registered Charity No. 252954 – www.wirralsociety.net

President : Professor John N Tarn OBE DL

13th October 2011

Alan C Scott
National Planning Policy Framework
Department for Communities and Local Government
Eland House, Bressenden Place
London
SW1E 5DU

Dear Sir

Draft National Policy Planning Framework (NPPF) proposals

This Society, which exists to look after the Wirral Peninsula, wishes to respond to the Government's invitation to comment on the above proposals.

Whilst in full support of CPRE's submission, our Society has deliberately held back in making its own comments until later in the Consultation period, to see what transpired.

What we have seen are a wide range of complaints raised about the Draft NPPF from an unprecedented number of individuals, a wide range of bodies dedicated to helping look after aspects of our environment and also from Local Authorities, who would have to make the new legislation work. Tellingly, what we have not seen, are any real objections from property developers and their trade organisations.

It must therefore be the case, that despite assurances from Ministers on the soundness of the new proposals, that the property companies and their trade organisations must be confident that the 'simplified' system will effectively, make it easier for them to gain Planning Permission.

We have been pleased that Ministers and others responsible for the Draft NPPF are meeting with the principal NGO's for preliminary discussions, but we still remain to be convinced that you will be prepared to make the fundamental changes to the proposals, to reflect the concerns that they are being raised.

This Society therefore wishes to ally itself with the many criticisms that have been made of the Draft as it stands at present. We would however, wish to make the following comments

1 The present Planning system:

Whilst we would agree that the present system is in need of some attention, we would say that we are broadly in support of the present arrangements as they stand at the moment. We don't accept the premise that it is holding back progress. We note from statistics produced by your Department that in the year April 2010 – March 2011, District Councils received a total of 483,000 Applications and granted permission for 358,000 of them (74%). This does not seem to us to be an argument for change. We note however your Department estimates an increase of some 1,200 Major Applications pa (equivalent to 3,000 acres) together with 11,000 lesser Applications and that approval rates will further increase. This increase must then be a further recognition that many of those applications will be

developers seeking to gain approval for applications where they have been refused in the past. This causes our Society much concern.

2 Simplification of the present Planning System:

We have no confidence that 'simplification' in itself would help improve the planning process. If however, by 'simplification' it means watering down or removing 'checks & balances' that have been built in to the Planning system over the past decades, then this brings the whole question of whether there will be any meaningful work for Local government staff in Development Control to do, in the future – with all that implies for our environment. We would ask that if the Government is convinced that the present legislation is too complex, then it should re-visit each of the clauses, and understand why they were written in the first place, and review their current relevance.

3 Local plans:

We have every sympathy for Local Councils, which are constantly being told to operate in different ways – in 1970's it was Structure & Local Plans, then Unitary Development Plans and most recently Regional Spatial Strategies and Local Development Frameworks, each with extended timescales to maximize the time for Public Consultation. Also, since the Planning and Compulsory Purchase Act 2004, successive Governments have made frequent changes to the rules governing how they should be compiled. There is therefore no wonder Councils have found it difficult having upto date plans.

We are pleased then, to note that the Government is sympathetic to the proposal to quote 'ensure that there is a period of time, a transition, for local authorities to have plans filed and agreed'. May we hope that this recognition is translated into action, should the NPPF be adopted.

4 'Sequential Approach':

Whilst we acknowledge the Draft says that ...'plans should allocate land with the least environmental or amenity value', we do not consider this is an adequate safeguard as it stands. We would question why the principle of requiring 60% of new development to be on 'Brownfield' sites, appears to be being abandoned. We understand there are some 160,000 acres of such 'Brownfield' sites currently identified, which equate to some 3m new homes. Also we note there are some 740, 000 properties, currently unoccupied in England & Wales.. We would also ask that the new regulations require that land held by property companies, which already have planning permission, be developed first, before the acquisition of more land is sought

5 'Sustainability'.

We would ask that you keep in mind that this country currently imports some 40% of its food. If this is ever to be held to this level, or better still, reduced, notwithstanding a rapidly increasing population level, and rising fuel costs, then the Country will, in all probability need to become increasingly dependent upon local land for food production. It is then questionable that such loss of unused land to development, could ever be considered 'sustainable', within the terms of your definition.

6 'Localism'

We are concerned that the Government's wish to give more support to local people

- a) because it is unlikely any local plans will ever have the support of the majority of local people – and thus democratic legitimacy
- b) if a local development plan does not conform to the NPPF, then the presumption in favour of sustainable development will apply to planning decisions. So while the regulations themselves indicate a shift of power to the local level, the draft NPPF could in fact threaten the ability of councils to enforce robust and locally appropriate planning policies.
- c) as we still remain to be convinced that putting a Local Plan in place would give local people control over what is built, given that these plans have to be adopted following Public Examination by a Government Planning Inspector who will be required to follow the Government's line on increasing housing provision.

In conclusion, could we remind the Government of Dr Liam Fox's words ' If we (the Government) are to have credible green credentials then the decision needs to be taken on more than short-term economics, ignoring the environmental impact in the longer term'.

Thank you for the opportunity to make these comments; we hope they help in reaching a sensible conclusion on this very important matter.

Yours faithfully

(Signed)

Rod Tann
Chairman