

## Draft National Planning Policy Framework

Having read most of the document, personally I do not see that there is too much that is controversial about a presumption in favour of sustainable development as there seem to be controls in place to prevent a developers free-for-all.

However, and it is a big however, I do have huge reservations about some of the wording of those controls and huge concerns about what might happen in the short term if Local Plans are not in place. There are many local authorities who do not have up to date Local Plans and I think the proposal to grant permission “where the plan is absent, silent, indeterminate or where relevant policies are out of date” is exceedingly worrying.

We should be hearing in the next week or so whether the Inspector considers the South Wiltshire Core Strategy is sound, but this has been a long time in the making and I wonder whether anyone has checked it carefully in the light of this draft Planning Policy Framework to see if there are areas where it is silent, indeterminate or even if it is already out of date.

I am sure we are all anxious to see the Inspector’s report and I will ensure it is circulated as soon as we receive it.

As we heard at the Localism seminar, Neighbourhood Plans are on the agenda. The Draft NPPF states that “the application of the presumption will have implications for how communities will engage in neighbourhood planning”. Neighbourhood Plans must “support the strategic development needs set out in Local Plans” and “plan positively to support local development, with the power to promote more development than is set out in the Local Plan”. “Neighbourhood Plans should identify opportunities to use neighbourhood development orders to grant planning permission for developments that are consistent with an adopted neighbourhood plan”.

It is of concern that there will not be the funds available for all the parishes in Wiltshire to prepare Neighbourhood Plans. There is a requirement that a Neighbourhood Plan must be assessed by an independent examiner before it can go to a local referendum. To pass the independent examination a Neighbourhood Plan must

“have regard to the policies of this framework

be in general conformity with the strategic policies in the local plan

be compatible with relevant EU obligations and human rights requirements”.

I have already touched on this subject with the Inspector regarding the South Wiltshire Core Strategy as it is clear that the cost of Neighbourhood Plans will be considerable, even above the Government’s estimate of between £17,000 and £63,000, when additional costs to comply with a number of European directives and conventions are taken into account. There are more than 250 parish councils in Wiltshire. I am sure that many will be too small to want to produce a Neighbourhood Plan, but even if half of them do, and do so at the lowest cost estimate, the total cost would be over £2m. And it is unlikely that there will be the manpower resources available within Wiltshire Council to provide the technical advice and input to Neighbourhood Plan preparation.

Development control will now be called development management, whose primary objective is to foster the delivery of sustainable development, not to hinder or prevent development.

There are paragraphs about “pre-application engagement and front-loading” and how this should enable improved outcomes for the community. There is even a suggestion, where local planning authorities think it would be beneficial, to encourage applicants who are not already required to do so by law to engage with the local community before submitting their applications.

This must surely be a good thing as so often one hears dark mutterings from the community that a development has been agreed behind closed doors and how the community is the last to know. It also makes it important for Neighbourhood Plans to be in place (and even more important that Local Plans are in place).

In the section on business and economic development, paragraph 75 states that “planning policies should avoid the long term protection of employment land”. Having responded to the Government’s consultation proposing the removal of the need to apply for permission for the change of use of B use classes to residential because of concerns we have locally about some of the former, quite extensive, MOD properties in the open countryside, I propose a similar response to this paragraph. I am sure we would not wish to see these properties suddenly ripe for residential development.

In the housing section, local authorities are required to identify a five year supply of specific deliverable sites, PLUS 20%, to ensure “choice and competition”. I know that Wiltshire Council presented evidence of a five year supply to the Inspector in respect of the SW Core Strategy and presumably the Council will now have to work on the sites to show the additional 20%. What concerns me is the general statement in paragraph 14 that planning authorities should “approve development proposals that accord with statutory plans without delay” – does that mean that permission must be granted for the additional development if a developer comes forward with an application?

Para. 112 states that in rural areas, “Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant affordable housing to meet local needs”. This is not what many of our rural parishes want – get those Neighbourhood Plans in place!!

Planning for places – Climate change etc.

To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation for renewable or low carbon sources.

Para. 152 – they should have a positive strategy to promote energy from renewable and low-carbon sources and design their policies to maximise renewable and low-carbon development while ensuring that adverse impacts are addressed satisfactorily. Who determines whether impacts are addressed satisfactorily? The community? Should we be including information about this in Neighbourhood Plans?

Para 153 – when determining planning applications, local planning authorities should apply the presumption in favour of sustainable development and not require applicants to

demonstrate overall need.....and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.....and approve the application if its impacts are (or can be made) acceptable.

This seems to me to be very woolly wording.

In the natural environment section, it states that local planning authorities should give “great weight to protecting landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It further states that “planning permission should be refused for major developments in designated areas except in exceptional circumstances where it can be demonstrated they are in the public interest”.

Would a large wind turbine or group of wind turbines be permitted in our beautiful AONB if the developer can demonstrate they are in the public interest if the “provide a valuable contribution to cutting greenhouse gas emissions” and if the impacts are “acceptable”?

Consideration of such applications should include an assessment of the need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, on the local economy.

Presumably a national consideration would be the greenhouse gas reduction targets introduced in the climate Change Act 2008. Wiltshire Council's ECO Team have already reported in a Topic Paper for the Wiltshire Core Strategy that Wiltshire's CO2 emissions have increased and that needs to be addressed. Bournemouth Dorset and Poole has just consulted on refreshing their renewable energy strategy and are proposing anything between 180 to 360 wind turbines in Dorset if they are to go some way in meeting the Government's targets for providing 15% of their energy needs from renewables.

Great care needs to be taken in ensuring that protection of the AONBs in Wiltshire is written into the Wiltshire Core Strategy bearing in mind the wording in this Framework. Not only do we need to respond to the Framework consultation but also to the Wiltshire Core Strategy which is still being developed.

Bridgetv Wayman

5<sup>th</sup> October 2011.