

NPPF Consultation Response:

Proposed Changes to Chapter 2

Question 1 No

Paragraph 7 Agree

Paragraph 8b Agree – but the use of the adjective "beautiful" is very subjective and open to diverse opinion. It will mean so many different things to different people.

Paragraph 8 c) Agree

Paragraph 9 Agree – but this aspiration is undermined elsewhere in the NPPF

Paragraph 11 a) **Strongly disagree** with the choice of the word "improve" the environment. It begs the question of what does "improve" mean? Instead the sentence should read "demonstrate due care and consideration for the environment"

Footnote 8 and elsewhere throughout the NPPF – the imposition of the 5 year land supply rule is arbitrary and inappropriate. It should be replaced with "appropriate land supply according to the particular circumstances of each planning authority"

Paragraph 14 Delete point a) Unless it can clearly and objectively be demonstrated that a Neighbourhood Plan is out of date and is no longer relevant to the community, it should not be ignored. The 2 year rule is far too arbitrary. Given that it can take 5 years to adopt a plan, rejecting it after 2 years is just a slap in the face for hard-working communities who had designed their plans at least in line with the time-frame of their Local Plans.

Paragraph 14 Delete point c) The requirement of planning authorities to have a 5 year housing supply is a complete red herring. What is far more important it that planning authorities should audit, annually, the number of outstanding planning permissions which have not been built out. They should be granted powers to remove all permissions over 12 months old. This will give a much more accurate assessment of what land is genuinely available and allocated for housing.

Chapter 3

Question 2 No

Paragraph 22 It's all very well to suggest that the strategy should look ahead to the next 15 years and 30 years for larger-scale developments. How many governments look beyond the next election? Local authorities need to be given greater confidence via the NPPF that having invested time and money developing a 15 year vision for their Local Plans, they will at least be afforded the opportunity to implement them. Neighbourhood Plans often demonstrate their vision for the next 10 to 15 years – therefore it is even more important not to over-rule them after just 2 years.

Paragraph 30 This gives good credence to Neighbourhood Plans. Why undermine them by allowing them to be over-ruled after only 2 years?

Qu 3 Chapter 4

Yes – agree

Qu 4 Chapter 5

Question 4 No

Paragraph 65 Amend 10% to 30%

The allocation of affordable homes at just 10% of major developments is completely inadequate. The lack of provision of affordable homes is a national disgrace. Where permission is being granted for major developments, greater consideration needs to be given to the provision of truly affordable properties – affordable in perpetuity. A minimum of 30% affordable homes would help to redress the balance.

Paragraph 70 Agree

Paragraph 73 Vague phrases, wide open to abuse. What does "genuine choice" mean in relation to modes of transport? Similarly, in c) what is "well designed and beautiful"? Phrases such as "the choice of design should be appropriate to sit comfortably with the local vernacular and environment" would be much more helpful.

Qu 5 Chapter 8

Yes – agree

Qu 6 Chapter 9

Yes – agree

Qu 7 Chapter 11 Yes

Qu 8 Chapter 12 No

The proposed changes are good but need further revision:

This whole chapter again champions the strategic importance of Neighbourhood Plans. The 2-year rule MUST be deleted otherwise neighbourhood plans will be a laughing stock throughout the country.

Areas of Outstanding Natural Beauty must be afforded the same level of protection as the National Parks.

The word "beautiful" is somewhat over-used and subjective and has no place in a document such as this.

Paragraph 130 is a welcome addition.

Paragraph 133 Agree – therefore don't over-rule neighbourhood plans after just 2 years

Paragraph 133 b) delete "innovative"

Qu 9 Chapter 13 Yes

Qu 10 Chapter 14 No

Paragraph 166 How quickly is "quickly"? What does "without significant refurbishment mean?" Does just one flooded home equal insignificant? It certainly wouldn't be insignificant to the home owner. This paragraph needs greater consideration.

Qu 11 Chapter 15 No

Paragraph 175 Insufficient weight is given to the Areas of Outstanding Natural Beauty which should be listed together with the National Parks
Paragraph 176 Delete " and the extent to which that could be moderated."
Paragraph 179 a) Delete "and enhance public access to nature" which will be counter-productive to conserving and enhancing biodiversity. Net gains to biodiversity are not achieved by encouraging people to tramp all over the land.

Qu 12 Chapter 16 No

Paragraph 197 This is a knee-jerk reaction to recent events. Re-order the paragraph so that statues, plaques and memorials are shown as examples rather than the corner-stone of the policy, viz: "In considering applications to remove or alter an historic asset (eg statue, plaque, memorial, signpost etc), whether listed or not, local planning authorities should have regard to the importance of retaining these heritage assets and, where appropriate, of explaining their historic and social context rather than their removal.

Qu 13 Chapter 17

No objections

Qu 14 Glossary

No objections

Question 15 National Model Design Code

The National Model Design Code looks comprehensive and its guidance could be very helpful to communities who are working through their neighbourhood plans. However, it is complex and its application to each community will be extremely time-consuming. Government needs to recognise the enormous commitment of volunteers who are not expert in matters of planning. If the Government wants to see the implementation of design codes, then there will have to be significant investment in financial support for those local communities who wish to engage with the process.