

TOTNES & DISTRICT SOCIETY

DRAFT NATIONAL PLANNING POLICY FRAMEWORK

Submission.

1. General Observations

1.1. The Framework is misconceived in having as its fundamental objective the use of the planning system as a vehicle for economic growth. Planning policy and legislation should be so framed as to hold the ring in an objective manner between competing interests. In particular the wider public and community interest should not be subjugated to private commercial gain.

1.2. Even as the planning regime functions now, there is not a level playing field between local authorities and large-scale commercial interests; local authorities have less manpower and financial resources available to compete with them. In addition they can on occasions be pressured into granting approval for unsuitable schemes because of the financial risks incurred should they lose a subsequent appeal. The risks which would arise should the Framework become law are substantially greater. Local authorities need to be given greater powers to enable them properly to represent community interests and provision should be made for costs to be awarded against a local authority only where that authority is shown to have acted capriciously.

1.3 Whilst there is some merit in seeking to simplify planning law and policy there appears to be no recognition that the issues raised both by national and local planning policies are complex. To assert that fifty pages will do the job of a thousand may well lead to greater uncertainty than exists under the present regime. As it stands it is not at all clear if existing policy statements remain in place or whether some or all are to be replaced.

1.4. As a Civic Society with charitable objects (inter alia) to encourage high standards of town planning within Totnes and the surrounding area we believe that our task will be made more difficult should the Framework be adopted as it stands.

2. Specific Points

Para. 14. Will there be a definition of “sustainable”?

Para. 17. There is a conflict between the Localism Bill and the Framework in that greater freedom is permitted under the Bill to neighbourhoods than in the Framework where they are only able to increase development contained within any DPD (see para. 50). How will this conflict be resolved? What resources will be made available to neighbourhoods “to develop plans that support strategic development ...”?

Para. 21. If power is to be devolved to local level why are local authorities allowed only to amend plans to bring development forward at “an accelerated rate, and must not be used to add to the financial burdens on development”. Surely in changed circumstances local authorities should have full and not restricted powers?

Para. 28. “Local planning authorities should have a clear understanding of housing requirement in their area”. South Hams District Council does indeed have this “clear understanding” in having a policy in place stipulation that 50% of residential developments should consist of affordable housing. The Framework accepts the need for this provision but with funding from the HCA being substantially reduced there are no means of achieving it.

Paras. 49 – 52. Communities cannot be expected to undertake the responsibilities imposed by these paragraphs without funding and/or administrative help. Provision should be made for this either within the Framework itself or a commitment to do so elsewhere.

Paras. 53 – 55. The tenor of these clauses is flawed. Local planning authorities should retain their powers to give weight to all relevant factors and not simply be subject to the diktat of economic growth.

Paras. 65 – 66. The same point arises as in paras 49- 52. If “Neighbourhoods” are to be given powers to grant planning permissions they must also have funding and administrative resources to enable them to exercise this function properly.

Paras, 107 -110. Whilst the objectives are generally supported the question of funding (as in para. 28) is unresolved for areas such as South Hams where the need is for affordable housing rather than open market, which is quite out of reach of most local people.

Paras. 114 -123. Design standards should also include minimum space requirements (e.g. as in the discarded Parker Morris standards) and minimum acceptable code level standards for construction. Control over outdoor advertisements (para123) should not be relaxed but strengthened.

Paras. 176 – 191. Whilst the objective to protect the historic environment etc is wholly to be supported it is not clear from the aspirational statements within these paragraphs whether present controls are to be relaxed or maintained. Clarification is needed.

Glossary. The reference to intermediate housing being sold at 80% of market levels effectively rules out any opportunity for the majority of local people within South Hams being able to purchase.

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