

WAVERLEY BOROUGH COUNCIL

EXECUTIVE – 4 OCTOBER 2011

Title:

CONSULTATION ON THE DRAFT NATIONAL PLANNING POLICY FRAMEWORK

[Portfolio Holder: Cllr Adam Taylor-Smith]

[Wards Affected: All]

Summary and purpose:

The Government has recently consulted on the draft of the proposed National Planning Policy Framework (NPPF). In essence, the Government proposes to replace the current plethora of national planning policy guidance contained in Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs) with a single streamlined document. The purpose of the report is to agree the Council's formal response to this consultation.

How this report relates to the Council's Corporate Priorities:

The NPPF proposes significant changes to national planning policy guidance which, if introduced, will have implications for key corporate priorities including those relating to the environment and affordable housing

Equality and Diversity Implications:

The response to the consultation does not itself raise issues in terms of equality and diversity. However, the NPPF itself does have potential implications in relation to matters such as social inclusion, equality, participation and community cohesion.

Environment and Climate Change Implications:

The response to the consultation does not itself raise issues in terms of the environment and climate change, however, the proposed NPPF itself will have major implications for how planning deals with environmental and climate change issues.

Resource/Value for Money Implications:

There are no resource/value for money implications arising from the response to the consultation. However, the NPPF itself and the way the Council deals with planning matters in the future, both in terms of policy making and decision making on planning applications, may have resource and value for money implications for local authorities. However, it is not possible to quantify these at this stage.

Legal Implications:

There are no legal implications arising specifically from the Council's response to the consultation.

Background

1. The Government is consulting on its proposed National Planning Policy Framework (NPPF), which is intended to replace the current national policy, which is set out in Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs), with a single streamlined document. The consultation, which runs until 17th October, has received widespread media attention and represents a significant shift in the national approach to planning policy.

Key elements of the proposed NPPF

2. The draft NPPF sets out the Government's economic, environmental and social planning policies. At its heart is the proposed 'presumption in favour of sustainable development'. The Government has identified three strands of sustainable development:-
 - Planning for prosperity (an economic role);
 - Planning for people (a social role); and
 - Planning for places (an environmental role).
3. The draft NPPF says that planning must operate to encourage growth and not act as an impediment. Therefore, it says that significant weight should be placed on the need to support economic growth through the planning system. It also says that decision-takers at every level should assume that the default answer to development proposals is 'yes', except where this would compromise the key sustainable development principles in the NPPF.
4. Whilst the draft NPPF proclaims a commitment to sustainability, it is clearly aimed at delivering growth in all economic sectors, and in particular growth in the housing supply, through the relaxation of policy constraints.
5. The key issues raised in the NPPF that have implications for Waverley include:
 - The introduction of the presumption in favour of sustainable development;
 - The need for an up-to-date 'local plan' consistent with the NPPF.
 - The requirement to plan to meet objectively assessed development needs, unless the adverse impacts of doing so would 'significantly' and 'demonstrably' outweigh the benefits, when assessed against policies in the NPPF.
 - The removal of national targets for the use of previously developed land and the absence of any indication that priority should be given to the development of previously developed land in preference to undeveloped land.
 - The key housing objective is to increase significantly the delivery of new homes. There is an expectation that an evidence base will be used to ensure that local plans meet the full requirements for market and affordable housing in housing market areas.
 - The requirement for the five year supply of deliverable sites to include an additional 20% over and above existing targets.

- Removal of the requirement that rural exception sites can only be permitted where they deliver 100% affordable housing. Local authorities are now expected to consider whether allowing some market housing would facilitate the provision of significant additional affordable housing.
- Planning policies should avoid long term protection of employment land or floorspace.
- A duty to cooperate with other authorities on cross boundary issues will now be one of the tests on which local plans will be examined. This includes an expectation that local authorities will work together to meet development requirements that cannot wholly be met within their own areas.
- Various changes to Green Belt policy. These include allowing development to be considered on all previously developed land in the Green belt (previously such land had to be identified and allocated in advance); the potential to alter/replace all buildings (not just residential); allowing community 'right to build' schemes; changing the criteria for applying or 'washing over' Green Belt in relation to villages; and relaxing the tests for buildings proposed to support existing outdoor activities.
- There is no reference to protecting the countryside for its own sake.

Response to the consultation

6. The Executive is recommended to approve the consultation response set out in Annexe 1. There are some aspects of the NPPF that can be supported. These include the principle of concentrating national policy into a single document and the aims of creating a simpler planning system. The extent to which the NPPF advocates a continuation of current policy in seeking to protect the openness and permanence of the Green Belt; to allow alteration of Green Belt boundaries in exceptional circumstances; and the protection of the Green Belt against inappropriate development, are also welcome.
7. However, officers have strong objections to some elements of the proposed NPPF together with concerns and comments on other aspects. The proposed response addresses some of the broad principles that underpin the NPPF and that have serious implications for Waverley, as well as commenting on details. The Officers' concerns and objections relate not only to what is in the proposed NPPF, but also where the NPPF is silent on important issues.
8. In summary the key concerns/objections are as follows:-
 - A fundamental objection that the NPPF is contrary to the principles of localism and local choice/decision-making.
 - A fundamental objection that the proposed policy is a charter for unfettered, inappropriate and unsustainable housing growth.
 - A concern that whilst the principles of sustainable development cover social and environmental issues as well as economic ones, the broad thrust of the NPPF suggests that where a balance needs to be struck, the economic considerations will prevail with minimal consideration of the impact on the environment and other relevant considerations.
 - The absence of the general presumption that development on previously developed land is preferable to development on undeveloped land and the lack of protection for the countryside for its own sake.

- The emphasis on meeting the demands for market and affordable housing in their entirety, with only minimal regard for the practical consequences for character, environment and amenity of the area, or the pressures that will be placed on local infrastructure.
- An objection to the proposal to identify an additional 20% of housing sites for the five year period. The justification for this is weak, but the consequences would be significant.
- A concern that the NPPF does not adequately deal with cross boundary issues. In Waverley's case, there are serious concerns about the impact on local infrastructure such as roads and schools arising from major developments planned in neighbouring authorities. Notwithstanding the duty to cooperate, this issue is not adequately dealt with in the NPPF.
- Waverley is concerned about the approach in the NPPF to employment land. Balanced communities need employment land as well as land for housing. Given the need to plan over a 15 year period it is necessary to ensure that there is sufficient land for both uses over the long term and this objective may not be achieved if short term market signals only are used to determine whether employment land should be protected.
- There is a serious concern that planning through the NPPF, with its emphasis on housing growth, will mean that there will not be the funds to deliver the infrastructure required to support development.

Conclusion

9. The Government's proposed planning policy could have severely damaging impacts on Waverley, and must be opposed.

Recommendation

That the Executive recommends to the Council that Waverley's formal response in objections to the draft National Planning Policy Framework as set out in Annexe 1 be approved.

Background Papers

There are no background papers (as defined by Section 100D(5) of the Local Government Act 1972) relating to this report.

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