

PLANNING REFORM SPECIAL

CPRE urges MPs and Peers to stand up for the countryside

As Parliament returns from recess a

consultation on the National Planning Policy Framework (NPPF) closes, the Campaign to Protect Rural England is asking MPs and Peers from all parties to ensure the countryside, England's greatest national treasure, is safeguarded against exploitation for short term economic gain.

CPRE is not anti-growth; we and our county branches actively support the building of affordable housing in rural areas and the regeneration of our towns and cities. But we do not believe that the planning system should be used simply as a tool to deliver economic growth. Its purpose is to secure the public interest in the development and use of land. It should continue to work in the long term public interest and should not be distorted to deliver short term financial gains at the expense of the environment and people's quality of life.

The planning system is a vital tool for achieving environmental objectives. We support elements of the Government's planning reforms and welcome proposals to get more people involved in shaping the places they live and work. We recognise the need to streamline national planning policy, but we believe the draft NPPF, in its current form, poses a major threat to the countryside.

To ensure that it promotes environmentally sustainable development which protects and enhances the countryside and promotes the regeneration of our urban areas, **the National Planning Policy Framework needs to:**

- recognise the intrinsic value of unprotected countryside which covers more than half of England, and set out stronger policies to protect the Green Belt and specially designated areas;
- retain the 'brownfield first' policy to promote urban regeneration and the efficient use of land;
- integrate effectively transport and land use planning;
- define sustainable development so that environmental limits are respected, rather than giving primacy to economic development;
- reinforce the plan-led system, including by ensuring effective transitional arrangements are put in place to allow time for plans to be brought up to date; and
- promote, rather than undermine, the delivery of affordable housing in appropriate locations to meet identified needs, particularly in rural areas.

Ahead of the close of the public consultation on Wednesday, 17 October, and in the following weeks and months before the final document is published, CPRE is asking all MPs and Peers who share our concerns to urge Ministers to improve the NPPF as suggested above.

Protecting the countryside ‘for its own sake’

Protection of the undesignated countryside for its intrinsic value or ‘for its own sake’, should be included in the final NPPF. This would support delivery of the Government’s June 2011 White Paper *The Natural Choice: securing the value of nature*. The NPPF should also explicitly protect the countryside from advertising hoardings and other unsightly clutter. Without this, the English countryside outside designated areas - more than half the country, including much of our natural heritage and historic landscapes - will be largely unprotected from damaging development.

The current presumption against inappropriate development in the Green Belt should be reiterated in the NPPF. Green Belt policy could be undermined by the sustainable development presumption together with the expectation that applications should be approved unless there are adverse impacts to policies in the NPPF as a whole. Draft policies on allocating more land for housing than necessary (see below) will also increase pressure to remove land from the Green Belt unless local authorities are required to prioritise the efficient use of brownfield

Reinforce the plan-led system

The proposed presumption in favour of sustainable development should reinforce the primacy of development plans in deciding planning applications. The presumption should be that if a development is not in line with the plan it should normally be rejected unless the planning authority or developer has both engaged with the local community and can clearly justify why the development plan should be overridden.

Transitional arrangements must give local planning authorities time to ensure their local plans take new national policy into consideration. Without these arrangements, on the day the NPPF is launched all local plans will effectively be out of date and the poorly drafted ‘presumption in favour’ is likely to result in a rash of poorly located development. This would undermine the Government’s commitment to the plan-led system and to localism.

Promote affordable housing

The need for development to be viable should not undermine local planning authorities’ ability to require developers, when appropriate, to deliver affordable housing as part of their plans for market housing developments. The draft NPPF states that the cost of any requirements applied to development should ensure ‘acceptable returns’ are still available for the land owner and developer. ‘Acceptable returns’ are not defined and we are concerned that they will undermine any negotiations on section 106 agreements regarding the delivery of affordable housing by developers. The NPPF should also state more clearly the need for a robust housing needs assessment, particularly in rural areas.

‘Brownfield first’

The NPPF should promote the benefits of ‘smart growth’ by encouraging the efficient use of land, reducing the need to travel, promoting a sense of community and making local services more viable. To achieve this it should integrate land use and transport planning and retain the ‘brownfield first’ approach that has been central to planning policy since 1995. It should require local planning authorities to set policies for the re-use of previously developed land, provide a justification for the release of greenfield land for development, and require housing at densities that ensure viable, sustainable communities.

The proposed requirement for local authorities to identify a five year supply of developable land for new housing with an additional allowance of 20% should be removed from the NPPF, otherwise their ability to secure genuinely sustainable development will be undermined. The more land local authorities are required to allocate, the greater the pressure will be on greenfield - including Green Belt - land, especially as it is proposed that, in general, they will not be allowed to take windfall sites into consideration. Greenfield sites may be more desirable to developers but their availability undermines urban regeneration and causes sprawl.

Make sustainable development meaningful

Significantly more weight should be given to the social and environmental consequences of development. All development should be environmentally sustainable. The draft NPPF states development proposals should only be rejected if their adverse impacts would ‘significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole’. This would be very difficult to prove. The NPPF should reiterate the principles of sustainable development set out in *Securing the Future: the UK Government Sustainable Development Strategy*, and be clear that proposed developments should be refused permission if it would undermine these principles, in particular the need to live within environmental limits, or damage the quality of the environment.

We’re here to help

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