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By email

6<sup>th</sup> October 2011

Dear Sir,

I am chairman of the Oxfordshire branch of the Campaign to Protect Rural England, and I am responding to the draft NPPF on behalf of the branch.

As an organisation we have been very much involved with the development of the present planning system, but we agree that it has become complicated and long-winded. We also understand very clearly, as we forecast at the time, that the attempt to set national targets for development and housebuilding failed completely.

We support the policy of more local planning, and therefore the concept of simplified planning rules and more local involvement.

However we believe that the draft NPPF has been too loosely drafted and will not provide the sustainable approach that it promises. It is weighted too heavily in favour of economic development at the expense of the environment, and very probably will not achieve the aims it claims to meet.

Houses are not being built because people cannot afford to buy them, and therefore builders are reluctant to build them. Small companies are not developing because the economic outlook is unsure, and money is not available for investment. It is a misreading of the situation we find ourselves in to blame the planning system for inaction, or to believe that freeing up the planning system will lead to increased economic development. This experiment could be at the expense of the open countryside we have nurtured for so many decades, and means that the proposals have to be re-examined.

We suggest that the NPPF needs to be tightened up in the following areas.

Sustainable development is not clearly defined. A proper planning system should provide a balanced outcome for economic development, social well-being and protection of the natural environment. To say that planning authorities should approve all proposals wherever possible is unacceptable. Planning authorities in making their decisions must be seen to take a balanced view taking into account the environment as well as economic growth. (Para 9 and throughout)

We welcome the emphasis on local plans, but it is clear that there are not very many in place, and few will meet the requirements of the draft. There must be transitional arrangements where a local plan has not been approved. It is unacceptable to say that permission should be granted where the local plan is absent, indeterminate, or out of date. (Para 14)

We support the idea of neighbourhood planning, but it must be the antithesis of planning to say that local developments can be approved although not in the local plan. This must be removed. (Para 17)

Major developments must always be balanced by appropriate infrastructure. It is negligent to suggest that supplementary planning documents should not be used to add to the burdens on development. It is surely the whole point of a planning department to ensure that all development takes place in a balanced way. This clause needs to be removed. (Para 21)

Neighbourhood Development and Community Right to Build Orders appear to cut right across the emphasis on local plans. It is woefully loosely worded. What is a local community? Who organises a referendum, and what is the constituency? Who are the independent examiners and who appoints them? This whole section needs to be examined carefully, or even deleted. There should be a limited opportunity for other groups to object, such as third party right of appeal. (Para 66)

Throughout the draft there is no specific reference to the effect on the environment. An example is para 68 where the tests for planning obligations do not include the effect of the development on its surroundings. This emphasis needs to change throughout the document.

We cannot understand the need to add 20% to the five year rolling supply of deliverable sites. Five years is quite enough and in practise is often not easy to achieve. (Para 109)

The statement that 'outdoor advertising should be subject to control only in the interests of amenity and public safety' is wide open to abuse. Is there any reason why the guidance should not say that advertising will not be allowed on motorways, trunk roads and the countryside generally? This would at least be perfectly clear and would avoid future legal arguments. The danger is that once a precedent is set the floodgates will open. (Para 123)

Since its introduction in 1995, the 'brownfield first' policy has been vital in preventing urban sprawl and protecting greenfield sites, and has played an important role in regenerating our urban areas. The proposed wording about 'allocating land with the least environmental or amenity value' simply is not strong enough to ensure that local authorities continue to prioritise the use of previously developed land. An explicit 'brownfield first' policy should be included in the NPPF. (Para 165)

We can see no argument for changing the rules on Green Belts. They are open areas maintaining the setting of major conurbations. In many Green Belts there are historically existing villages. To suggest that there can possibly be a reason why a village should be excluded from the Green Belt will open up a can of worms, and legal arguments. We strongly recommend that there is no change to the principles in PPG 2 – the whole point of Green Belts is their permanence, and that goes for the rules that apply to them also. (Para 141)

We have drawn attention to some of the more obvious faults in the draft. But is not just a matter of redrafting a number of clauses. The whole document needs to be re-drafted to balance the interests of the community and the environment with the needs for economic development. Otherwise we will get development at the expense of the environment and that will not be in anyone's interest. There is no reason why necessary economic development cannot take place without harming the environment, but not if the rules in the draft NPPF are followed.

Yours faithfully,



Brian Wood, Chairman Oxfordshire CPRE.