

Whitstable Society is a registered charity, no. 1000149. Chairman Kath Gill

Email address: enquiries@whitstablesociety.info

The Whitstable Society - (a member of Civic Voice)

Response to the Draft NPPF

We are a local group with 239 paid-up members representing the voice of ordinary people over 50 years. Our main aim cover the amenity value of our neighbourhood, streets, buildings, green spaces, countryside, town centre and of daily life for the vast majority for the people of Whitstable; and in these respects act as the Official Planning Consultee for the town for Canterbury City Council.

There are difficult choices to be made between development and conservation, technology and tradition. Groups like ours, that keep a watchful eye on change and progress, have managed to help town planners and councillors balance some of these conflicting pressures. Our role is in working towards all of these things, whilst recognising the need for growth and development. We work together with Canterbury City Council for the benefit of local people and the environment. Yet current guidance, that the views of local communities should be heard about what really matters in their historic development, is set to be lost. In the NPPF developing the evidence for planning and support for local listing of buildings and structures for example is to be dropped; denying a voice to people who know their area best.

The government insists there should be a presumption in favour of sustainable development, but it is cause of concern that there is no definition of “sustainable” which means different things to different people. It is hoped that the government will provide guidelines for “Sustainable”. Whilst we accept that there is a need to update planning guidelines we are concerned that the new guidelines are of insufficient content, which will give rise to unnecessary urban sprawl and not give sufficient protection to our countryside. The NPPF is wrong not to distinguish offsetting development effects. For example, retail can be sold as pro-growth but if it merely takes business from a struggling town centre (eg just because green fields can produce free parking), it is not necessarily pro-growth

The draft NPPF lacks a strong geographical rationale, which would set out the preferred locations for development, focus development where it can regenerate towns and cities, avoid sprawl, boost town centres for their economic and social role and reduce the need to travel. We fear a sprawling nature of new building that will result and add deadweight costs to the economy from increased infrastructure and travel costs.

The policies in Local and Neighbourhood Plans are to be drawn up to do everything to “support sustainable economic growth”, but the NPPF could “trample” the Local Plan and impose all kinds of requirements which may reduce the safeguarding against inappropriate developments.

The NPPF effectively sets up a new system. That is, a new ordering is created by which local plans are subject to the NPPF in both their approval and interpretation in operation. But since the NPPF is not a detailed manual, and PPGs and PPSs’ are swept away, there is great potential for inquiries and court cases to argue over poorly defined concepts in the PPF for both land allocations under the local plan and actual applications. This is primarily not the case in the present system.

The same situation will force local authorities to expand the size and complexity of their local plans to accommodate as much as necessary from a planning point of view into the local plan that is lost due to the removal of central planning guidance documents. Simplification gained at national level will be offset by bulkier local plans (which may even differ by LA in definitions left open by the NPPF) and as the NPPF says, it is open season if a local plan is 'indeterminate' and local plans must provide a 'high degree of certainty'. The absence of a definition of sustainability in the PPF is but one example of this problem.

The NPPF fails to take on board the reality that many developers, small and large, have the financial wherewithal and incentive to pursue appeals to any extent whereas local authorities ('Las') already cash strapped will be more so. Developers do to some extent already and will now be able to a much greater extent bully LAs into accepting schemes which are sub-standard by any definition because under the new NPPF system with its great uncertainties of detailed definition put LAs into a position where the gamble of defend cannot be justified. There would be a de facto presumption to any development in practice rather than to even the development that the government sees as acceptable.

The restrictions on Green Spaces designation ('will not be appropriate for most green areas or open spaces') will mean that neither community nor local authorities will be able to protect open space whose visual aesthetic / tranquillity is crucial to the community and even economy (other than that which is agricultural land graded 3A or above). With the elimination of PPG 17 this is the worst aspect of the NPPF and had it been in place over the last fifty years would have seen many critical green spaces which are currently treasured to be developed.

This quote "Where practical and consistent with other objectives, allocations of land for development should prefer land of lesser environmental value" gives hope of sequential logic, but 'environmental' as used in the NPPF is specifically defined not to include any section of countryside that has great scenic value to the community but does not happen to have special protections that are recognised by the NPPF (eg: AONB or better than grade 3b agricultural land). It is therefore unacceptably the case that the LA cannot distinguish ordinary countryside on a spectrum of attractiveness that was recognised under existing arrangements: eg protected open space designation (PPG17).

Large scale development of residential development should not be automatically judged sustainable unless there are or will be with some certainty employment opportunities in the area or that the new housing will be primarily for retired people.

Usefully the document suggests that 'statutory consultees will need to take the same early and pro-active approach to their involvement in development proposals'. The document should state so there is no room for misunderstanding that this includes 'official consultees' that are recognised by local authorities as standing in for areas that do not have town or parish councils ('unparished areas').

17/10/2011