



THE WARWICK SOCIETY

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16 October 11

Consultation on National Planning Policy Framework

The Warwick Society is the civic society in the town of Warwick, which has a population of about 30,000, 30% higher than a decade ago. Its planning authority is Warwick District Council, whose area has a total population of about 140,000; it also has a town (parish) council and is the seat of Warwickshire County Council, which is, *inter alia*, the highway authority and the education authority.

Much of the countryside to the north and west of the town is within the district and forms part of the Green Belt of the West Midlands and Coventry conurbation; to the south and east the boundary of the neighbouring district (Stratford) is much closer, and there is no Green Belt. The district is more prosperous than the West Midlands region as a whole, benefitting from its position in its south-eastern corner and good transport connections; but the town has an unequal distribution of income, and there is a severe shortage of affordable family housing.

The Warwick Society was founded in 1951, and has nearly 400 members. Its first object is to conserve for the benefit of the public the natural, artistic and cultural amenities of Warwick and its neighbourhood. Economic success is essential for the long term maintenance of the mix of mediæval and Georgian buildings which give the town centre its distinctive character; but that character is threatened by continuing sprawl outside the historic centre, and especially by the traffic generated by such development. All the main streets in the town centre are an Air Quality Management Area, already health is threatened and buildings are damaged by the volume of traffic passing through it.

The Society welcomed the removal of the requirement of the West Midlands Regional Spatial Strategy for housebuilding in the district considerably beyond the level required to meet its own local needs. It also welcomed the promise of the policy of 'Localism' that local communities would have more control over the future of their surroundings.

It welcomes the stated overall objective of the NPPF, to clarify and reduce the bulk of existing national policies.

But the Society strongly regrets that the NPPF reverses the policy improvements of a year ago, and gives undue priority to economic growth over all the other objectives of the planning system. It believes that the NPPF would lead to too much development, of the wrong kind and in the wrong places. This would severely damage the historic town centre and the quality of life of its residents.

The Society asks that the proposal should be reconsidered in the light of the numerous representations that are being deposited against it, and fresh consultation carried out on a new draft responding to these concerns. In more detail, and as far as possible by the numbers of the specific policy questions that you pose:

1: The Society **strongly disagrees** that the NPPF has the right approach to establishing and defining the presumption in favour of sustainable development.

The absence of a definition of Sustainable Development - development that meets the needs of the present without compromising the ability of future generations to meet their own needs - makes it impossible to approve of the NPPF's approach.

Economic growth should not, in planning decisions, take precedence over conservation of the historic environment; rather national policy should require many, and sometimes conflicting, objectives to be balanced, with due regard to the value and significance of listed buildings and conservation areas, and the sustainability benefits of protecting them.

The Society is particularly concerned at the proposal that, if a Local Plan has not been updated, the presumption will lead to greenfield development regardless of the consequences for infrastructure or the historic environment. This proposal, with the 'new homes bonus' payment from the government to local authorities, gives councils a perverse financial incentive to have an out-of date plan.

2: The Society **disagrees** that the draft NPPF's policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

Our experience of co-operation between local authorities is miserable. An unenforceable requirement to co-operate is not a requirement to agree, and we have found that councils rarely wish to pursue other than narrow optimisation of the benefits to themselves. The only strong co-operation has been in officer-led partnerships, free of democratic oversight. While the content of the late West Midlands RSS was unsatisfactory, we believe that some form of regional planning is better than none.

3 and 4: The Society **disagrees** that the NPPF's policies for managing development provide an appropriate level of detail and that any supporting guidance should be light-touch and could be provided by organisations outside the Government

The level of detail in the NPPF is insufficient for users of the planning system to operate efficiently and effectively with regard to the historic environment. Non-statutory planning guidance would be weak alongside the statutory national framework. It needs to be broad enough and strong enough to guide all users of the planning system and must have sufficient status to be a material consideration in planning decisions.

5: The Society **disagrees** that the 'planning for business' policies will encourage economic activity and give business the certainty and confidence to invest. They will distort the market in favour of 'quick fix' developments which might be financially satisfactory but are not economically sound, against the long term requirements of sustainability. The market signals to inform applicants' and planning authorities' decisions should reflect these long term policy goals, not frustrate them.

6: The Society **disagrees** that the town centre policies will encourage retail, business and leisure development in the right locations and protect town centres. They will, by reducing the strength of the 'sequential test', make out-of-town developments more likely, damaging town centre economies and community cohesion. Instead, more car-based, unsustainable development will be facilitated.

7: The Society **disagrees** that the policy on planning for transport takes the right approach. While encouraging a pattern of land use which minimises journeys between home, employment, shopping etc is good, many other proposed policies will militate against achieving this. Reducing the demand for transport and especially use of the car must be a basic aim of planning policy, if the required reductions in CO₂ emissions are to be achieved.

8 & 9: no comment

10: The Society **strongly disagrees** that the policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand. They are more likely in this district to lead to the construction of sprawling estates mainly of more expensive houses, encouraging migration from the larger cities of the region. The stimulation of this demand will make it harder to produce affordable homes for local people. There are already substantial numbers of unbuilt planning permissions for housing. In our view, the shortfall in housebuilding is caused by the collapse of demand through the tightening of mortgage finance, and by the structure of the housebuilding market, controlled by a few large companies exploiting land banks and other market imperfections.

11: no comment

12: The Society **disagrees** that the policy on planning and design is appropriate and useful. The design and energy conservation standards of the mass housebuilders fall far short of what is achieved in other European

countries. The presumption in favour of (inadequately-defined) sustainable development is likely to perpetuate this shortfall.

13: The Society strongly **disagrees** that the NPPF's 'strong clear message' on Green Belt protection is sufficient. The Green Belt was largely fixed in extent long before the present diffuse pattern of development in rural areas evolved. There are many greenfield expanses unprotected by Green Belt status which would be lost under the NPPF's policies through the reduction in the priority given to brownfield sites.

14 & 15: no comment.

16: The Society **disagrees** that the policy on the Historic Environment provides the right level of protection for heritage assets. While the key principles of PPS5 have been incorporated, the presumption in favour of sustainable development, and the policy of only refusing applications where 'the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits' could cause great damage to the historic environment.

The historic environment makes a substantial contribution to the economy, including tourism, to sustainability, to the quality of life, and to the sense of belonging which is the basis of civic responsibility. The Society concludes its representation with this reminder that what it has strived to achieve for sixty years is threatened by the short-term narrowness and loose wording of the proposed new planning policies.

James Mackay, Chairman