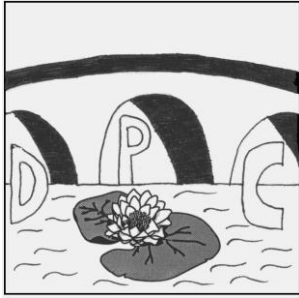


DOGMERSFIELD PARISH COUNCIL



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Sent by e-mail to planningframework@communities.gsi.gov.uk

Dear Mr Scott

Response to the consultation on the draft National Planning Policy Framework

Dogmersfield Parish Council has studied the draft National Planning Policy Framework and has a number of significant concerns which are set out in this response.

Dogmersfield is a relatively small rural village community characterised by open green spaces and close interrelationship with the surrounding countryside. It is a desirable environment in which to live with resulting high demand for the relatively limited housing stock. This archetypal southern counties rural environment is under increasing threat from development within the settlement boundary and from the expansion of nearby major towns. Its character, separation and the environment so highly cherished by its inhabitants will be lost forever without a responsible and effective planning regime.

Dogmersfield Parish Council finds that the draft National Planning Policy Framework offers no protection for our Parish and makes us and the local planning authority powerless to provide the protection that is needed, even if a considered local plan is in place.

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Building a national planning policy on sustainable development alone is flawed

We have noted that, in the context of the proposed National Planning Policy Framework “sustainable development” means development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is to be the core principle underpinning planning.

We also note that the planning system should be used to:

- build a strong, responsive and competitive economy;
- promote strong, vibrant and healthy communities;
- protect and enhance our natural, built and historic environment;
- use natural resources prudently; and
- mitigate and adapt to climate change, including moving to a low-carbon economy.

There is no necessary contradiction between increased levels of development and protecting and enhancing the environment, as long as development is planned and undertaken responsibly.

In our view the proposed National Planning Policy Framework is flawed and represents a totally inadequate basis for planning policy and individual planning decisions. In particular it fails to adequately identify all the relevant factors that should be taken into account; it is biased in favour of the developer and proposes only one-sided consideration of relevant issues.

At the heart of our concern is the strong presumption in favour of sustainable development, which we see more as a fault line rather than a golden thread running through both plan making and decision taking. We look to our local planning authorities to make balanced decisions taking all relevant factors into account rather than pro-actively supporting new development and approving all individual proposals wherever possible.

Clear evidence of the lack of balance in the Framework is that the ‘presumption in favour of sustainable development’ is reinforced 21 times within the 52 pages but ‘countryside’ considerations are mentioned only in the context of rural industry, tourism and as part of the definition of the term green belt. It is clear that within the Framework there is to be no consideration of the impact on or protection of the countryside unless it already enjoys green belt status.

The role of Local Plans

We recognise that Local Plans are proposed to be the key to delivering development that reflects the vision and aspiration of local communities and

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we are co-operating fully and positively in this process which has currently reached the local development framework stage. We support the need to assess the quality and capacity of transport, water, energy, telecommunications, utilities, health and social care, waste and flood defence infrastructure and its ability to meet forecast demands when setting local planning policy (paragraph 31).

As a small community we are heavily reliant on the services and infrastructure provided in local towns such as schooling and health and also the transport capacity of local roads and rail network. However, local infrastructure provision has not kept pace with extensive recent developments in our area and so saturation point has been reached. We believe that no further significant development should be approved by our local planning authority, or imposed through national policies, without a firm commitment and funding for much needed improvements to services and infrastructure.

We are consequently dismayed by the Framework's insistence that in the context of the presumption in favour of sustainable development the costs of any requirements likely to be applied to development such as affordable housing and infrastructure contributions should not be of a level that prevents the development being viable (paragraph 39). We are also concerned that development should not be prevented or refused on transport grounds unless the residual impacts of development are severe (paragraph 86).

We are aware that the Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with a number of legal considerations and whether it is sound. A soundness consideration is whether it is consistent with the presumption in favour of sustainable development (paragraph 48). We believe that the independent review must also take the wishes and expressed views of local people into consideration and we are amazed that these factors merit no mention in the Framework.

The role of Parishes and communities

We welcome the prospect that Parishes and communities will be given direct power to plan the areas where they live though the creation and approval of neighbourhood plans (paragraph 49). However, this local control is revealed to be unbalanced and limited to promoting more development than is set out in the strategic policies of the Local Plan. We find the limitations imposed on this local power to be one sided and an insulting interpretation of flagship Government policies on "localism".

Design of the built environment

We note that the Government attaches great importance to the design of the built environment which is to be indivisible from good planning and should contribute positively to making places better for people. This is an important consideration for preserving the character of rural communities and particularly where there is high proportion of listed buildings. We are consequently dismayed by the Framework's insistence, in the context of the

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presumption in favour of development, that responding to local character and reflecting the identity of local surroundings should not lead to the imposition of architectural styles or particular tastes on building designs (paragraph 118).

Green Space designations

We observe that the Framework includes a new Local Green Space designation whose object is to protect locally significant green areas which are special to local communities (paragraph 130). The area covered by Dogmersfield Parish Council contains many such valued green spaces, but it seems from an examination of the proposed policy in this area that it will be very difficult indeed to use this facility. We have doubts as to whether we could even protect our village green using this proposed designation.

Green Belt protections

The Framework includes a reminder that the general extent of Green Belts across the country is already established and states that it should not be necessary to designate new Green Belts except in exceptional circumstances (paragraph 136). It then sets out the protection offered to the Green Belt and to villages situated in the Green Belt. In relation to villages it says that if it is necessary to prevent development in a village because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt (paragraph 141).

Whilst this is laudable, restricting such considerations and provisions to existing Green Belt does not provide any protection to the wider countryside. Consequently the Framework will never become acceptable to this Council unless similar factors become a legitimate consideration for all rural communities.

Timing of implementation

Finally, we ask that if any form of the National Planning Policy Framework goes forwards, a time delay of at least twelve months be built into the policy to allow Parishes and Local Authorities to prepare, adjust and get approval of their Local Plans. This would delay the possible applications by developers until such time as the Local Plans were robust and agreed.

Yours sincerely

David Everett
Chairman
Dogmersfield Parish Council