

## **Response to Central Government by Supporters Against Fressingfield Expansion (SAFE) to the Draft National Planning and Policy Framework (NPPF)**

### **Introduction**

SAFE is a pressure group based in the village of Fressingfield which is situated on the Norfolk/Suffolk border. The village, with a population of around 1000 people is agricultural in nature, has almost no local employment and one bus per week to Norwich, situated 28 miles away. There are currently under 400 houses in the core part of the village. SAFE was established as an informal lobby group in response to a number of major Planning Applications for new houses in Fressingfield. These Applications, if approved, would result in an additional 284 houses being built. This, in a village with class C roads, few pavements, one small shop, a primary school and a health centre. The vast majority of households have 2 cars as this is the only means of transport. The nearest A road is approximately 5 miles away. Whilst SAFE's primary role has been to respond to the Planning Applications, keep villagers informed of the progress on the Applications and giving advice as to how to make their voice heard, our remit has extended to examining Government Policy Documents relating to Planning and Housing, particularly those at the consultation stage. We welcome the opportunity to comment on the Draft NPPF and have, in most part confined our observations to issues that impact on a small rural community.

### **Draft NPPF- Background**

The draft NPPF was released for consultation on 5th March 2018. It will replace a similar document published in March 2012. In principle the current draft is not radically different from its predecessor. The section dealing specifically with Rural Housing is very short being less than one page, this is a disappointment as 20% population do live in rural communities. The document is empathetic to the needs of rural communities clearly requiring that " Planning Policies in rural areas should be responsive to local circumstances and reflect local needs. Housing should be located where it enhances or maintains local communities."

Much of the report focuses on large towns with proposals for revitalising city centres. There is a specific section on the extraction of minerals, other sections address the needs of Travellers and the protection of the Green Belt.

The key word throughout the document is " Sustainability." Whilst there clearly remains the presumption to grant Planning Approval, unless the harm caused outweighs the benefits, SAFE believes that granting approvals to major developments ( schemes in excess of 10 houses) would be severely detrimental to this village. Development should be approved only if it is clearly demonstrated to be SUSTAINABLE.

There is an overarching problem with this document, namely, it repeatedly makes the proposition that more housing can be beneficial for health, well being and the environment. Patently it is not. (with the possible exception of urban regeneration). More houses results in more traffic more pressure on infrastructure , in particular school and medical services. It would be far better if the document honestly stated that more houses are needed and these need to be targeted where people work and wherever possible environmental damage should be minimised.

Our comments on the Draft Policy Framework follow the order and headings of the Draft Report.

## Detail comments on the Draft NPPF

### 1 Introduction

It is interesting to note that other statements outside the Plan such as Written Ministerial Statements may be material in the preparation of the Plans and deciding Applications ( *para 6* ) How the impact of possible Ministerial interventions will work in practice could be an issue as any strategic planning framework does need to be robust.

### 2 Achieving Sustainable Development

This section is clearly to be commended. The key objectives of sustainable development are properly explored. It is a pity that the excellent draft Policy Document "Planning for the Right Homes in the Right Places" is not cross referenced here as this would fit neatly into argument. The key elements for a safe and healthy environment are identified. Importantly sustainable solutions need to take into account local circumstances (*para 9*).

When exploring the Presumption in Favour of Sustainable Development it is right to link this back to locally produced Development Plans, but in a Local Authority such as Mid Suffolk where there is not a Development Plan , nor a current Joint Local Plan ( the last was 1998) nor a 5 year housing supply, local populations are being unfairly penalised because of the Planning vacuum.

Protection of specific assets (*para 11.d. ii*) is exceedingly narrow in its interpretation of such assets. In our medieval village we have 58 listed buildings, yet under the definition of "protected areas " (*footnote 7*) would not receive special protection.

### 3. Plan Making

The suggestion that Plan making should enable local people to shape their surroundings is commendable, but the whole Planning process is exceedingly cumbersome and process driven. To achieve the stated objectives a radical streamlining of the system should be considered. In no part of the document is this suggested.

It is interesting to note that there is a "legal requirement placed "upon Planning Authorities to produce plans which contribute to the achievement of sustainable development and planning decisions are legally bound to be judged on whether or not they meet the sustainability test. ( *para 16a* ).

In the absence of overarching strategic policies in Mid Suffolk the indications as to what should be within the Strategic Policies is helpful. The broad analysis, not just concentrating on houses to be built, shows the complex inter- relationship between work/ leisure/ health/ education/ general infrastructure/ transport/ climate change etc

It is a paradox that need and local opinion are important for shaping local policy, but yet communities are powerless to prevent inappropriate development or development which is not called for in the Neighbourhood Plans when this document states that "Neighbourhood Plans should not promote less Development than set out in the strategic policies for the area." (*para31*)

In Mid Suffolk there is only one village, Mendlesham with a fully adopted Neighbourhood Plan. The District Council has strongly been advocating that all communities develop a Plan and, indeed, we have recently started the process in Fressingfield. It is exceedingly unfortunate that an Appeal for two houses on a site designated as a Visually Important Open Space within Mendlesham's Plan has been upheld on Appeal. This completely undermines all of the time and effort spent by the local community.

The discussion on development contributions is interesting in theory, (para 34) but, in our village NO development contributions are put forward by the Developers other than the standard CIL payments. The anticipated CIL payments have been assessed as being capable of meeting only the extra capacity required at the primary school. There is nothing for the health centre, the roads, the sewers etc all of which would need upgrading should an additional 284 houses be built. The isolated and physical nature of Fressingfield mitigates against green transport strategies and cycle routes. There are no net gains from the proposed developments other than increasing housing numbers. There are only 11 households in the locality awaiting affordable housing and all of these could be accommodated in the Affordable Housing allocation within schemes already approved.

It is a great pity that the paper does not build on the local assessment of housing need proposed within the document "Right Homes Right Places." This document stated that far too much time and money was being wasted in each Local Authority undertaking its own "Strategic Housing Review" especially as this is normally produced by costly consultants. Whilst the application of a formula on a National basis is, inevitably crude, it does have the merit of being transparent and fair. It also has the merit of having the potential of being applied right down to Parish level if required.

#### 4. Decision Making

It is interesting to note that developments should improve the economic, social and environmental conditions in an area. (para 39) The proposed developments in Fressingfield do not tick any of these boxes. It is often argued that villages have to grow to remain viable and certainly we would support small scale limited development. Over three hundred houses have been built in Fressingfield since 1946. Despite this increase we have lost a Post Office, shop, butchers, petrol station, newsagent, dentist, ironmonger and a bakery which provided a home delivery service.

Whilst Pre- Application discussions are obviously sensible. Currently they are not mandatory. (para 41) Should this document not suggest that they become compulsory? The engagement with the local community at the pre Application stage in Fressingfield was meaningless. One scheme presented at a public meeting included a 60 place home for the elderly which was removed at the Application stage and another a new social club which was also dropped. We would advocate that this section needs to be much stronger in its recommendations and for local engagement to be meaningful.

The proposal that Planning conditions and obligations are weakened are not welcomed. There are numerous examples of developments being completed not within the terms of the Approval. We would argue that the legal powers available to Local Authorities should be strengthened not further weakened. It is very surprising "Enforcement action is discretionary." the word "enforcement" implies just that. The paper argues for maintaining public confidence, but if the rules are not enforceable how will confidence be maintained? ( para 59)

In respect of Affordable Housing what will the strategic policy be if, in an area, such as ours, has already approved sufficient numbers of Affordable Homes to meet local need? As there is almost no local employment to allocate further houses to non local people will result in car journeys to work and fail the test of green sustainable transport. (*para 63*)

#### 5. Delivering a Sufficient Supply of Homes

Paragraph 66 seems to have totally ignored the excellent proposals contained within " Right Homes, Right Places". This proposal is a return to each Authority undertaking its own Strategic Housing Review. This is just NOT a good use of public funds. It is not clear how a " neighbourhood area" is to be defined.

It is encouraging that support for windfall sites is given. Small infills can provide a steady flow of additional houses and their importance is often overlooked. In our village we have a long history of infill windfall sites and would encourage this to continue, where reasonable in Planning Terms. (*para 71*)

Paragraph 78 attempts to address one of the major obstacles to the delivery of new houses, namely " land banking " by developers. In 2017 Planning Approvals out striped new housing completions by a factor two to one. There are over 420,000 projects that have Approval ,but are waiting to be built. There is no real incentive for developers to proceed in a timely fashion, their objective is to wait until the market is "right "to maximise profit. The document recognises the problem, but " local authorities should consider a planning condition providing that a development must begin within a timescale shorter than the relevant default period." This proposal is very vague. Would it not be more sensible to make it much harder and expensive for a developer to seek approval to renew an Application which is time expired. There needs to be a serious stick here to prevent land with Approval being treated as a long term investment. Land banking creates artificial shortages and therefore impacts on house prices.

#### Rural Housing

It is disappointing that less than one page of this important strategic report considers " Rural Housing.". There is no proper consideration of the issues facing rural communities where infrastructure is poor. The statement " housing should be located where it will enhance or maintain the vitality of rural communities"( *Para 80*) needs exploration. As stated previously there is a paradox here. Despite the number of houses in our village increasing from around 100 homes in 1946 to just under 400 currently the services within the village have been severely reduced during this period. ( these are listed in section 4 ).Large numbers of people in the new homes work and the vast majority either doing shopping on the way home or shop on line. New developments do put major pressure on the roads in villages, the medical facilities and the school. They do not support local shops to any significant degree. CIL payments do not cover the improvements to infrastructure and the quality of life within the village is reduced for everyone. The economic, social and environmental condition of the area are certainly not enhanced if large scale disproportionate development is approved. certainly such an approach in Fressingfield is not sustainable. Windfall developments are supported, but not large scale development.

#### 6 Building a strong, competitive economy.

This section takes a sensible approach to urban planning and the need to ensure that housing is located in a way which supports economic growth. Live /Work was a concept popular in the 90s, but seems to have attracted less support of late. It is encouraging to see this being resurrected as it makes sense in terms of productivity, green transport, carbon reduction etc. ( *para 82 and 83*)

As regards supporting a rural economy the statements are somewhat over optimistic. Over 1000 people live in Fressingfield. In the village there are about 50 WTE jobs, but the majority of those employed do not live in the village. The medical centre and the school are major employers, but staff working there are generally non resident. Opportunities for rural tourism are very limited ( *para 84.85*) and certainly if 284 new homes were built in this medieval village this would certainly reduce its attractiveness as a tourist destination. Improving access by foot is impossible as we are 28 miles from a major centre ( Norwich/ Ipswich/Bury St Edmunds) and 5 miles from a small market town - Harleston.

#### 7. Ensuring the Vitality of town centres

Not relevant to Fressingfield

#### 8. Promoting healthy and safe communities.

This section is full of good intentions and laudable objectives, but it is extremely difficult to see in practice how this will be delivered. The proposal that there be " legible pedestrian routes" is sensible, but in Fressingfield the main street where the shop and medical centre are located has, for large part, no pavement and no possibility of constructing one. Making a "safe environment" is not feasible. (*Para 92b* )More houses result in more traffic and even greater risk. The decreasing use of S106 obligations, the proposed weakening of the use of Planning Conditions/ Obligations / Enforcements and the overall reduction in Developer contributions result in almost no community gain being attached to Planning Approvals. These aspirations are non deliverable unless there is a major rethink in respect of the impact that large increases in population have on a local community. Who is going to pay for the " green infrastructure, sports facilities, and local shops" (*Para 92 c*) Walking and cycling in our village is extremely hazardous with limited pavements, no cycle routes and class C roads. As regards choice of schools, there is one primary school in the village. If the major developments take place the school will either have to be expanded or children go to school in other villages. There is a limited choice of secondary schools, all out of village, so the children have to go to school by bus. The County Council is currently consulting on reducing school bus services so this may well result in a further reduction in the choice of secondary schools.

#### 9 Promoting sustainable transport

This section logically rehearses the arguments for sustainable green transport systems and is very applicable to urban settings. What it is not relevant to is a community with one bus a week, no cycle routes, limited pavements, no safe routes for the disabled, no delivery points for the shop, only 12 parking places at the surgery, a large amount of on street parking and class c roads! The environmental impact of traffic and transport infrastructure is required to be assessed in development proposals. with " net gains in environmental quality." ( *Para 103c*) There are no net gains for Fressingfield . More traffic will only exacerbate an already very difficult and dangerous

situation. There is almost no scope for improvement in road width or introduction of pavements as houses immediately abut the narrow roads and the major part of the village is a Conservation area.

#### 10. Supporting High Quality Communications

No Comment

#### 11. Making Effective Use of Land

The reiteration of the policy to utilise brownfield sites is welcomed. We understand that a problem for Suffolk is that there are insufficient brownfield sites to meet demand.

It is very difficult to identify any developments in rural settings that have resulted in "environmental Gains." Quite the reverse has happened on a large scale throughout Suffolk.

#### 12. Achieving well-designed places

This section recommending good design practice is commendable in its intention, but is absolutely silent as to how this can realistically be achieved. This is particularly relevant to the major house builders. Throughout Suffolk it is very easy to identify the developer involved by recognising the standardised housing units on any particular site. The same design repeats over and over in different locations. There is absolutely NO incentive for a major house builder to "read" the local townscape and design accordingly. Unique designs are more expensive to produce and result in less profit. One developer when recently challenged over a particularly unsympathetic development in an historic Suffolk town merely remarked that the "standard northern urban design homes" had been used!! Cannot Local Authorities be given proper powers to reject the "standardised designs" repeated all over the country? With the proposed relaxation of Planning Obligations etc it is impossible to see how these good intentions will be realised.

#### 13. Protecting the Green Belt

No Comment

#### 14. Meeting the challenge of climate change, flooding and coastal change.

The section on climate change is again full of good intentions, but other than be more sympathetic towards renewable and low carbon development, there is no really incentive for a developer to choose to put forward such schemes. The NPPF should be far more bold in laying out the strategy for the future in this area. To state "Plans should take a proactive approach to mitigating and adapting to climate change" (*para 148*) is far too nebulous. There should be clear strategic goals and targets. This is just all far too vague, passing the responsibility to Local Planning Authorities, which will each take diverse approaches across the country. It is unfortunately true that increased housing will result in increased cars, which will in turn impact on greenhouse gases. This is not addressed.

As regards the proposals on dealing with flooding. There does seem to be an over reliance on the sequential tests. These are computerised desk top investigations, which, we believe can give misleading results, particularly if the base line information is incorrect. For example there have been four floods in Fressingfield in the last 5 years. The Environment Agency had none of these recorded,

therefore all of the flood modelling for the proposed houses to be built on farmland is incorrect. More houses result in more hard landscaping and run off. Water has to go somewhere.

#### 15 Conserving and enhancing the natural environment.

This section is very positive with the goal of preserving the natural environment. Unfortunately, such is the shortage of brownfield sites that inevitably in a County such as Suffolk building frequently takes place on arable land. This does nothing to enhance the natural environment( *para 168*)

The specific identification of National Parks and the Broads is possibly too restrictive. ( *para 170*) There are other very important areas of natural beauty which should be preserved and protected.

As regards biodiversity, the Proposed developments in Fressingfield are contiguous and do nothing to protect or enhance biodiversity. ( *para 172.*)

#### 16 Conserving and enhancing the historic environment

This section encourages Local Authorities to produce Plans which produce "a positive strategy for the conservation and enjoyment of the historic environment".(*Para 183*) Unfortunately housing estates negatively impact on historic environments so it is difficult to see how the aspirations in this section and the reality can be achieved? In Fressingfield we have a 58 listed buildings and a large Conservation Area, yet we are being faced with Applications for 258 houses. The fact that such developments will impact negatively on the historic and heritage assets has not been considered as relevant in our objections.

The statement " the desirability of new development making a positive contribution to local character and distinctiveness" ( *para 188c*) sounds very laudable, but how many new housing developments exist that satisfy this requirement?

#### 17 Facilitating the Sustainable use of Minerals

No comment

#### Conclusion

This Draft NPPF has many noble aspirations, but is very " light touch " in setting down parameters for delivery and mechanism for guaranteeing compliance.

The importance of this document cannot be overstated. It is "The Policy Document" which is the starting point for all Local Authority Development Plans. It is therefore a pity that it is very vague in certain areas leaving important strategic planning decisions to individual Local Authorities. Whilst it preferable to devolve decision making to the local level where practicable, clearer policy statements would have been helpful. For communities to truly have a say in the Planning process they must be able to limit development in their Neighbourhood Plan if they are to shape local policy. The lack of certain strategic goals will result in a lack of consistency across the country and the potential for legal challenge. The proposed reduction in the powers of Local Authorities ensure adherence to the conditions of Planning Approvals is not supported. The failure to propose mechanisms to prevent "land banking " is an opportunity missed as this would have been the single most powerful tool in addressing the immediate shortfall in housing supply.

P.C J.C A.M 22 March 2018