

## **East Leake Parish Council**

### **Response to Government Consultation on Planning Reforms, May 2018**

This is East Leake Parish Council's response to the government's consultation on the revisions to the National Planning Policy Framework.

See <https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework>

#### **Chapter 1 - Introduction**

*Q1 Do you have any comments on the text of Chapter 1?*

The planning process, at both strategic and local level, takes far too long. Our Local Planning Authority has not yet completed its plan 5 years into the plan period. Our Neighbourhood Plan was over 3 years in preparation, taking huge amounts of effort by local residents. While the Local Planning Authority is dragging its feet their lack of housing land supply means that just a very few areas within the borough outside the green belt are being targeted by developers, placing unacceptable strain on local infrastructure and destroying our village. Development here is developer-led, not plan-led, and this needs to change. We don't see that the revised framework will help, indeed it seems to make the whole process ever more cumbersome. For their failure to provide their 5-year housing land supply there are few consequences for the Local Planning Authority, but there is a hugely negative impact on our local community.

We are not arguing that houses are not needed, nor are we trying to prevent all development in our village. Our comments relate to our particular set of circumstances, but we certainly do not think we are unique – we know of other communities situated just outside green belt, where the planning authority does not have a 5 year housing land supply, who are experiencing similar unplanned and uncontrolled explosive housing expansion. We are willing to provide further explanation/evidence if required.

#### **Chapter 2 - Achieving Sustainable Development**

*Q4 Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?*

Our Neighbourhood Plan was made before the Written Ministerial Statement. It provides criteria for assessing sites for suitability but does not allocate specific sites because sites for over 800 homes were already approved during the early period of our plan process, against a minimum target of 400. Five years into the 15-year plan period we are now heading towards 1200 new homes – three times the target and increasing the size of the village by half again. Building is well under way and the sites will build out quickly. The community cannot cope with such a huge expansion in a short space of time. There are insufficient primary school places and the Education Authority is now asking developers for contributions to transport children out of the village rather than provide more places at the two schools or build a third school. The Health Centre is half the size it should be and the oldest in the county. The sewerage system is inadequate and raw sewage overflows the storage

tank onto the street and into the water course, which floods over the children's playing fields. Expansion of the village at this rate is not "sustainable development".

Please don't keep telling us that you want communities to have a say in their own planning decisions. Despite having expended huge effort on producing a Neighbourhood Plan, this is not our experience and we see nothing in the proposed changes that will help us and other communities in our situation.

We suggest that P14 be thought out again, so that more weight is given in the planning balance to the level of development achieved within a community relative to the relevant strategic targets.

### **Chapter 7 - Ensuring the vitality of town centres**

*Q18 Do you have any other comments on the text of Chapter 7?*

We broadly support the framework in terms of planning measures to improve the vitality of local centres but find the terminology "town centres" unhelpful. As an overblown village, the question "are we a town or village" is a very emotive subject here, but most residents agree with the need for clustering of services, retail etc in a vibrant village centre. The glossary makes clear that "town centre" does not refer just to towns, but the chapter itself does not. At least a footnote is required, but rewording would be better.

### **Chapter 9 - Promoting sustainable transport**

*Q23 Do you have any other comments on the text of Chapter 9?*

We have found that a developer-led situation (due to lack of 5 year housing land supply) is working against the aims expressed in this chapter of promoting sustainable forms of transport. Development in our village is taking place in a series of separate sites, some adjacent to each other, each developed as separate cul-de-sacs with not even pedestrian routes being provided to give permeability into neighbouring areas of housing and the other new sites. This significantly increases journey distances, leading to more car journeys, and children being driven to school rather than walking. In order to really promote sustainable transport, pedestrian and cycle routes that link areas of housing need to be provided, and the planning process needs to make this happen. The practice of holding "ransom strips" works against permeability and should be stopped.

### **Chapter 12 - Achieving well-designed places**

*Q29 Do you have any other comments on the text of Chapter 12?*

We support use of design standards and tools such as "Building for Life" in assessing applications and this is a requirement in our Neighbourhood Plan. However it is our experience that the Local Planning Authority takes very little notice of this. If an assessment is done at all it is provided by the applicant themselves, and these are often glib and/or biased, and indeed inaccurate. A proper, independent, assessment is required and this needs to be built into the planning system. Lip service is not enough.

### **Chapter 13 – Protecting Green Belt Land**

*Q31 Do you have any other comments on the text of Chapter 13?*

Our borough has large areas of green belt, but our village lies outside the green belt and so is being targeted by developers “leapfrogging” the green belt. Housing is being provided further from the urban edge than the strategic plan requires, and with only mediocre public transport links.

Whilst the government intention to protect the green belt is laudable, it is giving rise to disproportionate undesirable impacts outside the green belt. We make the following points:

- The public at large do not in our experience understand the difference between “green belt” and “green fields”. So while the emphasis on protecting the green belt may initially be well received, there is anger and disappointment when green fields outside the green belt are destroyed for housing.
- The green fields that surround villages outside the green belt are as beautiful and valuable to their communities as those within the green belt.
- The process of releasing land from the green belt is elaborate and slow, increasing the delays in strategic and local planning.
- Green belt surrounds built-up areas, but these sites on the urban edge are, for reasons of sustainability, the areas where housing needs to be built.
- Where new housing is eventually built on the urban edge on released green belt land, the green belt needs to be moved outwards i.e. new areas of green belt created in an expanding circle to maintain separation from other settlements and continue to satisfy the other objectives for which the green belt was originally provided. Creation of new green belt land should be promoted in the NPPF as well as the statement in P137 about “compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

#### **Chapter 14 - Meeting the challenge of climate change, flooding and coastal change**

*Q32 Do you have any comments on the text of Chapter 14?*

We pick up the point in P155 about plans having regard to the cumulative impacts of flood risk. This village suffers occasional episodes of flooding under storm conditions. Our storm water and sewage is not separated, the capacity of the pumping stations and water treatment works has not been increased to match the increase in housing, and sewage is discharged into flood water and water courses. It seems obvious to us that the overall impact on these systems needs to be assessed when housing targets are assigned to communities, and then re-assessed for applications over and above that target number.

It is our experience that developments provide their own SUDS, but that there is no holistic modelling of the impact of multiple sites, not even where these adjoin each other and discharge water from one to the other. Residents have very little faith that these SUDS function as intended, and there are concerns about long term management. The SUDS are often unattractive features, full of litter, and built deep and steep, so dangerous to children. There is very little attempt to provide environmental or biodiversity benefits.

P163 should explicitly reflect the point about cumulative assessments. It should state which agency monitors that SUDS are being maintained and are operating correctly. Additional guidance in the framework is needed on visual impact, safety, and ecological management.