

# Loughborough South West Action Group (LSWAG)

The Secretary 203 Nanpantan Road Loughborough LE11 3YD  
info@loughboroughswag.co.uk

Nicky Morgan MP  
House of Commons  
London  
SW1A 0AA

6<sup>th</sup> October 2011

Dear Nicky,

We are pleased to be granted this opportunity to submit our response to the draft National Planning Policy Framework, which seeks to simplify the current planning system by reducing, unnecessary, legislation and guidance.

We welcome the intention to make the system more accessible to local people and to give local communities an opportunity to play a greater role in the decision making process. However, we are troubled by the requirement in the draft Framework to adopt a “presumption in favour of sustainable development” where clarity surrounding the term ‘sustainable’ is absent.

Without a comprehensive definition of sustainable development and the principles necessary for its delivery it would appear that the only test for the expression seems to be based on short term economic growth, which we find totally unacceptable.

We understand that there are three objectives of sustainability (economy, society and environment) but the draft NPPF requires the LDF to assume that development should be permitted wherever possible and that “significant weight should be placed on the need to support economic growth” but not on the other two elements.

We believe that this together with the requirement to prepare the local development plan within the context of the Local Growth White Paper (October 2010) and the government’s Plan for Growth agenda, which followed the Chancellor’s March 2011 statement, will skew the LDF in favour of developers rights and thereby undermine the vision that communities might have for their own area.

We appreciate that the Framework continues protection for Heritage sites, Green Belt, Areas of Outstanding Natural Beauty, National Parks and Sites of Special Scientific Interest, but does not offer any protection for the majority of the English countryside. As you will know Charnwood does not have any, Green Belt, AONB, National Parks or Regional Parks, although it is an area of particularly attractive countryside and is home to much of the National Forest.

We also understand that the LDF does not recognise the term “valued green space” in the way the draft Framework does.

The NPPF states that the designation of locally significant green space should only apply to green space that is in “reasonably close proximity” to urban areas and should not be “an extensive tract of land”. We

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believe that these terms need to be defined more precisely in order to avoid misunderstanding and prevarication.

We are very concerned that where councils do not have an up to date development plan the local authority is required to “grant permission” for development. Charnwood Borough Council will not have their LDF in place until 2013, which will leave this area vulnerable to large scale unplanned developments. Therefore, we believe that arrangements for the transition from the old to new system, needs to be revised and given a realistic time frame.

We believe that a failure to do this would lead to uncertainty, creating a vacuum and a ‘free for all’, which would be in no one’s interest.

We would like the NPPF to attach more importance to the protection of agricultural land, for the production of food, which is crucial, if we are to feed a rapidly increasing population. However, we are concerned that the emphasis placed on the economic element of sustainable development and the “presumption in favour of sustainable development” could lead to the industrialisation of the countryside in the form of, uncontrolled large scale, farm buildings for the intensive rearing of chickens, pigs and cattle.

It is unclear as to the precise meaning of the statement “neighbourhood plans will take precedence over existing plans for that neighbourhood” given that the Framework also states that the neighbourhood plan needs to be in general conformity with the strategic plan.

We consider the removal of the 60% target for housing on brown field sites and marginal land to be a profound mistake and are concerned that the requirement to provide more land for housing, than is actually needed or demanded, will lead to a ‘cherry picking’ culture.

We hope our views will be given due consideration.

Yours sincerely,

Patrick Keogh (Secretary)

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Alan Scott

NPPF consultation team

Department for Communities and Local Government

Zone 1/H6

Eland House

Bressenden Place

London SW1E 5DU

8<sup>th</sup> October 2011

Dear Mr Scott,

Loughborough South West Action Group was formed in March 2009 in response to the consultation exercise on the proposed Core Strategy for Charnwood.

More than 300 people attended a meeting earlier this year to discuss 'locally valued green space' and left local councillors in no doubt about their opposition to proposed developments across some of our most beautiful countryside, which is recognised as 'an area of particularly attractive countryside'.

However, you will appreciate that this designation offers no protection and will also be aware that Charnwood does not have any green belt.

I have enclosed a letter, which has been sent, to Nicky Morgan MP highlighting our concerns about the draft NPPF and would ask you to accept this as our response to the proposed Framework.

We believe that our group represents upwards of 1000 local residents.

Yours sincerely,

Patrick Keogh (Secretary)