

22 February 2016

Dear Sir/Madam

Proposed changes to national planning policy

This is Saltford Environment Group's response to the Government's consultation on proposed changes to national planning policy (December 2015) published by DCLG at <https://www.gov.uk/government/consultations/national-planning-policy-consultation-on-proposed-changes>.

To ensure that sustainable development with a 21st Century perspective is the overarching policy that determines planning policy, our comments include a recommendation that a sixth purpose for the Green Belt, "to protect agricultural land and/or eco-systems that help underpin the UK's food security", be added to the existing five purposes listed in NPPF at paragraph 80.

Our comments are restricted to questions 1, 7, 19 and 20 in the consultation document as follows:

Q1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national planning policy to include a wider range of low cost homes?

A1.1. We welcome the proposal that the definition of affordable housing will continue to include a range of affordable products for rent so that those on lower incomes with a requirement to live in expensive areas but unable to afford house purchase have an alternative option. The provision of rented housing is essential in some rural areas, for example, so the provision of rented accommodation does need to be a priority.

A1.2. There also needs to be 'in perpetuity' planning restrictions (as for affordable housing for sale) to protect the "available for affordable rent" status.

A1.3. As affordable housing can be a need for local people, e.g. to help care for elderly dependent relatives or meeting child care needs, serious consideration should be given to implementing measures to ensure that local people (within a given radius of the development) are given priority for living in new affordable housing so that it is not simply snapped up by incomers who may not have the same specific proximity requirements.

Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?

A7.1. Yes, it would be beneficial. Whilst we welcome the Government's intention to require local planning authorities to publish and maintain up-to-date registers of brownfield sites suitable for housing and its ambition for 90% of brownfield land suitable for housing to have planning permission by 2020, that does not overcome the problem of land banking by developers.

A7.2. Planning mechanisms, including the use of incentives/disincentives as appropriate, which expedite brownfield housing developments are necessary if the full potential and most effective use of suitable brownfield sites for housing development is to be realised. It should not be left to developers to pick and choose, and thereby determine, priorities for the location and provision of new housing.

Q19. Should local communities have the opportunity to allocate sites for small scale Starter Home developments in their Green Belt through neighbourhood plans?

A19.1. Whilst the provision of affordable housing and starter homes should be a national priority, any such opportunity should be determined by the local community at the local level wherever possible. This means that, in order to protect the Green Belt and the local community from speculative development, consultation and decision making should be determined at the Parish or District level, i.e. where development impacts are felt, and not at the higher unitary authority level. To maintain sustainable development as the purpose of planning policy, the NPPF five purposes (para. 80) served by the Green Belt should also remain a higher policy aim in the decision making process than the provision of affordable housing on Green Belt land, i.e.

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns;
- and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

A19.2. However the five purposes are missing a sixth and key purpose that is relevant to sustainable land use planning policy in the 21st Century.

A19.3. The UK does not know its future carrying capacity taking account of unsustainable UK and worldwide population growth and the future climate change impacts on domestic and overseas food production. Therefore Green Belt land that can be used for food production purposes or provides ecosystem support for agricultural land (e.g. pollinator habitat, flood protection etc.) is too valuable in macro-economic terms to be used for housing and should be protected from housing development as a "national strategic asset".

A19.4. Whilst individual parcels of land in themselves may contribute relatively little to food security and a healthy eco-system, the UK cannot predict or control the cumulative effect of gradual erosion and loss of such land to development until it is too late and the damage is irreversible.

A19.5. The Green Belt thus has a sixth purpose, "to protect agricultural land and/or eco-systems that help underpin the UK's food security" and this should be recognised in any

amendment to the NPPF provisions affecting the Green Belt if genuine sustainable development is to be the over-arching policy for planning policy in the UK.

Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact on openness?

A20.1. The openness and permanence of the Green Belt is recognised as an essential characteristic of Green Belts by the NPPF (para. 79). The quality of the countryside including the Green Belt and other green spaces within and surrounding housing settlements is widely accepted to be an important aspect of quality of life that is essential for maintaining good mental health in the population and promoting health and well being^{1,2}. Openness is by its very nature an important aspect of the feel and experience of the natural environment. **The future residents of affordable/starter homes and existing residents in the proximity of newly built housing are equally entitled to healthy natural environments that include an open aspect.**

A20.2. In view of the need to add a sixth purpose of the Green Belt (see answer to Q.19 above), i.e. to help underpin the UK's food security, any allowance to redevelop brownfield sites in the Green Belt should take account of that purpose whilst close proximity to employment and support services to reduce or avoid commuting congestion and to reduce the need to travel should be a requirement before such land is considered appropriate for redevelopment. **Having firstly observed the "six" purposes of the Green Belt, it is essential that the openness of brownfield land remains an important factor that should be taken into account for a new starter home development on brownfield land in the Green Belt so that the development is low rise and of low visual impact to the surrounding area.**

A20.3. Brownfield sites can provide important wildlife habitat and/or wildlife corridors. Where an ecological study proves this to be the case, the provision of compensatory habitat should be a pre-requirement for new developments so that healthy eco-systems can be maintained, recovered or enhanced in the same general area.

Please acknowledge receipt of these comments.

Yours faithfully

PHIL HARDING MBE

Chairman

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References

¹ 'Future health – Sustainable places for health and well-being', CABE 2009

<http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/files/future-health.pdf>

²Older people, the natural environment and common mental disorders: cross-sectional results from the Cognitive Function and Ageing Study, Yu-Tzu Wu et al 2015 <http://bmjopen.bmj.com/content/5/9/e007936.full>