

RESPONSE TO THE DRAFT NATIONAL PLANNING POLICY FRAMEWORK

SUMMARY

Key points made by FoBRA are as follows:

- FoBRA agrees with much of the Framework's intention, accepting that there is a need for more housing and that the current regulations are wordy and complicated. We think it is the task of the planning system, and Local Planning Authorities (LPAs), to strike a fair balance between the three worthy but inevitably competing principles cited (§9-10). The Framework must be clear, however, which principle it is promoting (§13). "Sustainable development" we support (though "sustainable" needs a more robust definition) but "sustainable economic growth" is worrying and "economic growth" ignores the social and environmental roles of planning altogether.
- The new direction to LPAs that development needs are to be met through Local Plans and to grant permission where Plans are absent, etc., is alarming and quite unfair, even irresponsible (§14). No Plan is ever "out of date" until superseded (§26&110).
- The Framework grants unique protection to Birds and Habitats, so why not other categories of international importance, such as World Heritage Sites (§16)?
- The rules for "presumption in favour of sustainable development" lack balance. For example:
 - In the spirit of the Government's new localism agenda, neighbourhoods need to have power to protect important features (§17);
 - Brownfield should be developed before greenfield land (§19&70);
 - Preapplication consultation should be mandatory, including with residents (§19&56-58);
 - Enforcement procedures should be included (§19);
 - Neighbourhoods should be free to adopt plans which reflect local circumstances, even if these add some cost (§21&39);
 - Associated infrastructure delivery should not burden the taxpayer (§43),
 - It should not be assumed that space can always be found in crowded town centres for retail or leisure needs (§76).

Federation of Bath Residents' Associations

14th October 2011