



## Draft National Planning Policy Framework

### Response from the Dever Society

#### Introduction

1. The Dever Society is an amenity society for the Hampshire Downs and the Dever Valley, and is a registered charity. The Society's principal objective is to conserve, protect and celebrate the countryside in this part of Hampshire. In particular, it is concerned with the conservation and enhancement of the Hampshire Downs, which comprise the rural heartland of the county. The Downs provide a unique and valued resource for those who visit and enjoy the countryside, as well as forming an essential feature of the agricultural economy of the county.
2. The Dever Society was formed in 1990 in response to proposals by Zurich/Eagle Star to develop a new settlement based around the railway station at Micheldever Station, some 10 miles to the north of Winchester. The Society has a large membership, drawn not only from those who live in the Dever Valley, but also from a wide area of Hampshire and elsewhere in Britain.
3. While the Society's principal focus remains the protection of this area of the Hampshire Downs from inappropriate development, it has sought to play an active role in the planning of the wider area.
4. The Dever Society welcomes the opportunity to respond to the consultation on the draft National Planning Policy Framework. We have five main areas of concern:
  - The practical definition of the term 'sustainable development';
  - The risk of a development free-for-all on undesignated land in the countryside;
  - The omission of a requirement to build on brownfield or previously developed land before greenfield sites;
  - The potential conflict between the draft NPPF and the Government's localism agenda;
  - The uncertainty in terms of planning applications when a Local Plan is deemed not to be "up-to-date".

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#### THE DEVER SOCIETY

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REGISTERED CHARITY NUMBER: 1003093 ♦ REGISTERED WITH THE CIVIC TRUST

## **Definition of sustainable development**

5. We welcome the draft NPPF's use of the Brundtland Commission's definition of sustainable development, encompassing as it does environmental, social and economic sustainability. The difficulty has always been in attempting to put this definition into practice, and the draft NPPF is no different. We are concerned that the draft goes on to state that the "Government is committed to ensuring that the planning system does everything it can to support sustainable **economic** growth" and that "significant weight should be placed on the need to support **economic** growth through the planning system (our emphasis). Economic growth should not take precedence over social and environment sustainability – this is not sustainable development as defined by Brundtland.

6. The draft states that "local planning authorities should plan positively for new development, and approve all individual proposals wherever possible", and that proposals can be turned down only when "the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits." We believe that proving this would be almost impossible, and are concerned that as a result, refusals of permission would be overturned on appeal. In addition, the burden of such proof would fall heavily on objectors, many of whom may be small groups or communities with limited resources. The Dever Society has had experience of this - a recent planning application in our area was approved because the economic benefits of the development were deemed to outweigh the harm that it would cause to an important local amenity woodland. We believe that development proposals should only be granted permission if they can show that they would not erode the sustainable development principles laid out in Government policy documents such as *Securing the Future: delivering UK Sustainable Development Strategy*.

## **A development free-for-all on undesignated land in the countryside**

7. We welcome the clarification by ministers since the publication of the draft NPPF that Green Belt land and land in Areas of Outstanding Natural Beauty will be protected. However, as much as half of England is made up of countryside that has no designation and thus is unprotected. The majority of the area of Hampshire of concern to us falls into this category. Despite its lack of designation, it plays an important part in the rural landscape and contains significant amounts of high quality agricultural land. It also acts as a green buffer between the large settlements of north and mid-Hampshire. This will be the same for countless areas elsewhere in England. Lack of designation does not imply lack of importance, and we are concerned that the draft NPPF would allow a development free-for-all in such areas.

## **The deletion of the brownfield before greenfield policy**

8. The application of this policy in Hampshire has meant that in the last 10 years over 75 per cent of all new housing has been built on brownfield or previously developed sites. This has greatly helped with regeneration in our urban areas, protected significant amounts of greenfield land and reduced urban sprawl. We are very concerned that the omission of

this policy from the NPPF would put increased pressure on the countryside, as developers would trade on the presumption in favour of development to build on the easier and cheaper option of greenfield land.

### **Conflicts between the NPPF and the Government's localism agenda**

9. There would seem to be an inherent contradiction between the bottom-up localism agenda and the top-down presumption in favour of development imposed on local authorities and communities by the draft NPPF. There is an urgent need for clarification.

### **Local Plans deemed not to be "up-to-date"**

10. Many local authorities are in the process of preparing their Core Strategies as required by the Planning and Compulsory Purchase Act 2004. Local authorities must be given time to complete these and detailed transitional arrangements must be made for this. We are very concerned at the draft's statement that in the absence of an up-to-date plan, the presumption in favour of development should apply, as this could result in uncontrolled and unplanned development applications which would be difficult to resist (see paragraph 6 above).

The Dever Society  
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