

Written evidence submitted by Ruth Langhorn [NPP 330]

I attended the forum on the enquiry into the NPPF on 1st September and would like to make some further points:

- Brownfield sites are not being developed ahead of green field sites.
- The wording of the NPPF is vague.
- Planning for housing in local plans seems disproportionate.
- Future generations lives are being made worse by current actions.
- Presumption in favour of sustainable development clause is causing widespread problems.

1. The NPPF recommends use of brown field sites par. 111 but has no measures to enforce or even to encourage this:

There should be some financial incentive to developers to build on brown field sites. This would compensate for the smaller sites, perhaps the contaminated land and the more difficult access within a town centre where a lot of brown field sites are sited. Regenerating sites nearer to town centres will also accomplish the other aspiration of the NPPF to regenerate town centres.

- i) The new homes bonus could be weighted towards brown field sites and so encourage development on smaller brown field sites that are generally in a location nearer to town centres and so nearer to available facilities.
- ii) The VAT that is currently not charged on new builds should be extended to development of brown field sites.
- iii) Some financial incentive could be given to developers to regenerate brown field sites.

The town I live in has an old mill that has stood derelict for a number of years probably nearly 30 years. It has about 8 floors whereas all other surrounding buildings are only 2 floors high. It is the tallest building in the town and is highly visible as you drive into the town centre and is a major eye sore and if it does not discourage shoppers from visiting the town centre it certainly detracts from the experience of shopping in our town.

2. The wording of the NPPF is vague in places in particular the use of 'sustainable development'. This needs some quantifiable metrics to apply to applications to see if they are sustainable. As it is LPA are applying different criteria and developers are being allowed to build in areas that would never have been deemed suitable before the NPPF.
3. The planning for houses seems to be irrational. Take for example the local plan for Cheshire East which has a disproportionate allocation of houses for the south of East Cheshire. This seems to be with no rational explanation on why this is done. It does not seem to take account of the local need for affordable housing. It does not seem to take account of where people work, which if they do not work locally or within

Cheshire East, then they work in the larger cities which in south Cheshire East's case is Manchester and possibly Liverpool, Bradford, Halifax and Leeds. Very few people in south 'Cheshire East' commute south for work. The only accessible city to the south of Cheshire East is Stoke on Trent and the next large city is Birmingham which is not really within commuting distance. So this disproportionate allocation of housing in the south of Cheshire East will result in a large increase in commuting to the north on an already overburdened road system. The roads throughout the south of Cheshire East are mostly winding country lanes, with no lengths of dual carriageways until you reach Wilmslow. Any new housing should be built where there are facilities that provide current employment, that is to the north of East Cheshire. As the Cheshire East local plan itself states it has a high level of industry relating to R&D and science in the North of Cheshire East:

North Cheshire Science Corridor

11.7 North East Cheshire, as part of a wider North West Science & Technology cluster, has the potential to become a UK lead specifically to aid commercialisation of innovation in the 'KeyEnabling'(47), 'Great Eight'(48) and 'Health-Science' technology fields. The area is host to a net concentration of globally significant companies which represent a hotbed of intellectual capacity and entrepreneurship. Cheshire East has particularly high levels of R&D activities within Great Britain with Cheshire East accounting for 36.9% of the region's R&D jobs and 3.3% of the country's (GB)R&D jobs.(49)

Bearing this in mind the allocation of housing should be evenly distributed throughout Cheshire East and not concentrated to the south as it currently is. The increase in housing for Wilmslow is 400 for a population of 30,326(2001 census) and for Congleton is 3500 for a population of 25,750. The increase should be proportional to the current population if only to be able to provide services in the foreseeable future with the current facilities.

I quote Wilmslow as this is geographically in the centre of where Cheshire East identify developing the North Cheshire Science corridor.

Is it not logical to increase local service centres by 10% to cope with the increase demand on local services? Following this logic Wilmslow would have an increase of 1318 houses (at a household size of 2.3) and Congleton would have an increase of 1119(at a household size of 2.3). Those extra houses being planned for Congleton with only a small increase in available jobs would leave approximately 2000 houses in Congleton with say 2 adults, so 4000 cars commuting to the north of East Cheshire. But if those houses had been built in Wilmslow then they would already be in the vicinity of the North Cheshire Science corridor and would only have to commute a short distance. I have randomly chosen Wilmslow and Congleton, it could easily have been Sandbach(allocated 2,200 in the south of Cheshire East population 4,864) and Handforth (allocated 150 in the north of Cheshire East, population 9,000)

The high propensity of houses to the south of East Cheshire is not 'sustainable' in an economic way as the extra cost of fuel(to the individual)and the extra maintenance of the road system(to the local highways department), it is not sustainable in an

environmental way with unnecessary pollution from cars and demand for fossil fuels and it is not 'sustainable' in a social way as it deprives the working public of their free time making them commute ever further distances to work to earn a living. This is against the NPPF par. 7.

4. Local services are not being planned to keep pace of the already allowed developments. For example take school places. The number of pupils in Primary school's classrooms are already increasing with no provisions for extra classrooms or schools in Cheshire East. These increased class sizes are being taught in classrooms designed for smaller class sizes. This will be to the detriment of the education of future generations. This is against the NPPF principal of sustainability – 'better lives for ourselves don't mean worse lives for future generations'.
5. The NPPF clause 'presumption in favour of sustainable development' applied when there is no local plan in place and when the 5 year land supply is missing seemed to be a problem for a large proportion of the attendees on the forum day on 1st September. This reflects badly on the Localism Act which has an aim to give more power to neighbourhoods. This clause should be removed or the previous plan should hold full weight until a replacement plan is available. This is allowing developers to build wherever they want where a plan is not yet in place. This is not planning. This is a charter for developers.

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