



SOUTH DOWNS NETWORK
Working for the best possible National Park

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Mr Alan C Scott
National Planning Policy Framework Consultation
Department for Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU

10 October, 2011

Dear Mr Scott,

Response to National Planning Policy Framework Consultation

The South Downs Network is an alliance of around 50 environmental, conservation and local amenity organisations in the South Downs National Park area. Its purpose is to share information and best practice, to help prevent damaging development while supporting sustainable development in and around the National Park.

The South Downs Network is extremely concerned that the full ramifications of the draft National Planning Policy Framework are not properly understood and that the Framework as currently drafted could have many unintended consequences. In so far as it concerns National Parks, the Network considers the following changes to this draft to be essential:

- a. state that National Parks will receive the highest status of protection (as in current national planning policy).
- b. include reference to the statutory purposes of a National Park and the statutory requirement for all public bodies to have regard to those purposes.
- c. give stronger protection for National Parks in relation to quarrying, so that quarrying will not take place other than in exceptional circumstances (as now).
- d. protect the setting of National Parks from development which will have adverse impact on the special qualities of National Parks, including views over the setting which are a vital feature of the special qualities of many National Parks.

- e. have sustainable development defined in a way that reflects accepted principles of sustainability and can be applied in practice to development proposals, otherwise National Parks will be unable to continue their roles as beacons of genuine sustainable development.
- f. prioritise brownfield land development, as this accords with sustainable development and the statutory purposes of National Parks to conserve and enhance the natural beauty of the park area.
- g. state how it will deliver the commitments in the Natural Environment White Paper, particularly in the National Parks.

Anything less and the role that National Parks play as exemplars of sustainable development, and the socio-economic and environmental benefits derived as a result, could be lost.

A key concern of the Network is that the draft Framework will place considerable cost on local planning authorities, local communities and developers alike. For the planning system to deliver sustainable development at reasonable cost, a degree of certainty is required. This is what the current system provides, even if there are ways to improve it. Unfortunately the draft Framework is over-simplistic, does not provide certainty and so is unlikely to deliver this stability. As a result a level of certainty would have to be re-established by developing a whole new record of case-law through the courts. This is likely to lead to a large number of planning appeals which will slow down the planning system rather than speed it up.

In summary, the South Downs Network believes that the implementation of the draft Framework would actually be *counterproductive* in its current form. Therefore the Network objects to the draft Framework, and would urge you therefore to take stock and find the time to undertake a significant redraft of the Framework so it can provide the basis for a coherent and efficient planning system.

Yours sincerely,

Dr Tony Whitbread
Chair
South Downs Network