

Draft National Planning Policy Framework – Consultation Response

Report to Executive Board (12 October 2011)– Suggested Report changes arising from Development Plan Panel 11 October 2011

Change	Para. No	Suggested Change
1.	General Comment	The final City Council response/recommendations should cross reference the corresponding paragraphs in the NPPF consultation document.
2.	Sections 2 & 5, Paras. 2, 2.2 & 5.1	The principle of simplifying and streamlining the planning system <i>should not be accepted</i> , the response and letter to MPs therefore needs to be amended to reflect this point. Detailed planning guidance is very useful and necessary in informing planning decisions. This should not therefore be swept away in one go. Where the review of guidance is necessary, this should be undertaken on a more gradual basis.
3.	Section 2, Para. 2.4	Amend last line to read ‘...permission should <u>not</u> be bought and sold’.
4.	Section 3 Para. 5 Housing Provision	In the response, the City Council needs to specify the number of windfall units delivered over a 5 year period, as a basis to demonstrate the significant contribution windfall has made in the city. The word “say”, needs to be inserted into the sentence, “At a minimum build of <u>“say”</u> 30 unit/hectare.....”
5.	Section 3 Sustainable Economic Growth Para.9	Need to include within this section, DPP concerns regarding para.75 of the draft NPPF which states, ‘Planning policies should avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses.’ DPP’s view was that this approach would be catastrophic for Leeds, as this would not allow the city to plan for longer term job growth and would result in employment land and premises being displaced by higher value uses (reflecting market signals).

6.	Section 9 Corporate Considerations Para. 4.3.1	DPP were concerned that the draft NPPF <i>did not</i> reflect Council Policies and City Priorities and should therefore be redrafted to strongly state that the NPPF as written is contrary to City Council Policies and City Priorities for sustainable development (in delivering environmental, social and economic objectives at the same time), urban regeneration, protecting local character, distinctiveness and environmental quality. This is due to the draft NPPF as written, being unduly weighted in favour of development and the economic aspects of sustainable development.
7.	Consultation response form, questions 11a & 11 b	Change 'Agree' to 'Disagree' but qualify reason in text box to Para. 11 b to note 'The City Council supports the principle of the need for a collaborative approach with schools promoters in resolving issues prior to formal planning applications being submitted'. However, there are concerns regarding the weight being attached to establishing new schools and how this relates to aligning provision with the strategic planning for schools and the delivery of an overall housing strategy (and for this to be underpinned with the necessary infrastructure).