

**TRAFFORD CORE STRATEGY EXAMINATION**

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o. 123

**Inspector's Note 7 re Draft National Planning Policy Framework.**

1. These comments are written in the context of my concern over the future of Davenport Green.
2. Despite current criticisms of the present planning system it has over the past 50 years generally balanced the need for new houses and other buildings with the needs of local people and their environment.
3. I am most concerned that the draft NPPF's "presumption in favour of sustainable development" could in fact turn out to be a default "yes" to any development, and that this will impact most adversely on Davenport Green, despite the current Green Belt status of most of it.
4. The removal of the obligation to develop brownfield sites in preference to green field sites is of particular concern, as this could quite easily impact adversely upon the urban re-generation process.
5. There seems no agreement on just one meaning of "sustainable development": an activity can only be truly sustainable if it can be pursued indefinitely into the future using resources which never run out, eg: low intensity farming and fishing, and also cycling and walking.
6. I find the statement "development means growth" to be far too sweeping; without proper scrutiny and control it could mean deterioration in people's local environments. The "presumption in favour of development" is also worrying; while no one wants to halt schemes which genuinely enhance localities and economies, there may well be cases where development should not proceed, but this new presumption pre-empts the situation, thus prejudicing proper planning.
7. NPPF para 17's second bullet point may well overturn most Local Planning Authorities' current careful calculations about land use and site provision. One detects an assertion that more development should be promoted than is set out in the Local Plan. What, then, is the point in having a Local Plan ?
8. NPPF para 29 shows, in my view, that Trafford Council is correct in its wish to see its town centres and their businesses prosper, and in its concern that commercial development at Davenport Green could well pull valuable business investment away from those centres. NPPF para 76 has more to say about promoting and enhancing town centres.

9. NPPF para 75 confirms that TMBC were fully correct in their recently abandoned intention to return to Green Belt that portion of Davenport Green which had been removed from it in 1995-6. The recent history of this area of land has been “long term protection of employment land”, and the “market signals” to date – within the remit imposed by the 1994 Planning Inspector -- have been that there is no interest in this site. To propose to return it to Green Belt therefore seems fully justified.

10. NPPF para 88 says that developments generating significant movement should be located where the need to travel will be minimized, and the use of sustainable transport modes can be maximized. Any high quality development at Davenport Green will do the opposite of this because of its relatively remote location and because the vast majority of professional staff expected there would use only cars and not public transport.

11. Green Belt. NPPF paras 133 – 147 seem to embody the basic principles of PPG2. In the case of Davenport Green, it appears to me that NPPF paras 138, 139 and 143 indicate that Trafford Council’s original plan to return land here to Green Belt met these criteria, so that the current situation whereby it will not be returned to Green Belt status is unsound.

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