**To:** Planning Policy Consultation Team,Dept of Communities and Local Government

Swindon SW1P 4DF

PlanningPolicyConsultation@communities.gsi.gov.uk

Dear Planning Policy Consultation Team,

My response to the Housing White Paper Consultation is as follows.

Yours sincerely

**[replace with your name, address and postcode here]**

**Question 3**. We disagree regarding making available “surplus public land.” The status of public land/assets and land bequeathed to the community should be preserved.

**Question 10a:** We disagree that *Green Belt boundaries could be amended after examining other options.***Introducing such a test would lead to repeated legal challenges to the Green Belt.**

**Question 10b-f:** We disagree. We re-emphasize that **the current National Planning Framework (NPPF) text is sufficiently explicit that the Green Belt designation is effectively off limits; any net loss could never be acceptable.**  **“Housing need” does not constitute an “exceptional circumstance.”**

**Question 12c:** We agree with ***“the importance of early pre-application discussions between applicants, authorities and the local community about design.”***  If this is a genuine objective of the White Paper, much more should be included as to how this can be achieved. We suggest a broadening of the consultation questions to include **i. Financial support for community responses**, **ii. More realistic, sufficient timescales for community response to planning applications. iii. Planning conditions to be maintained (rather than eroded).** These are written in as necessary safeguards, often for the benefit of the community. **iv. Compulsory purchase.** We disagree with compulsory purchase so-called reforms (Page 42, 2.43) to make the process “clearer, fairer, and faster.”It is difficult to envisage how proper protection for landowners can truly be retained. Residents should not be driven from their homes to make way for new homes.

**Question 13c:** We agree that *development should reflect the infrastructure capacity of an area.*Failure to address infrastructure issues is a long-term major problem in our area. Although the Trans-Pennine Upgrade Programme may enhance the transport infrastructure (and therefore improve the traffic flow rate), there should be an embargo on building on the Green Belt there (as is planned in the GMSF), because the **additional housing will place pressure on the transport infrastructure and overload it again**, especially as the proposed housing development is beside a motorway junction. The transpennine upgrade programme itself will involve building more structures on greenbelt land. New roads mean that biodiversity corridors such as hedgerows will be destroyed, which has many repercussions ecologically (habitat fragmentation). To compound this with new housebuilding is a death sentence for Longdendale wildlife.

The White Paper is designed to steer readers by virtue of the questions it asks. Indeed we feel that this White Paper has the appearance of a Developers’ “Charter.” It should have been entitled as such, rather than masquerading as a document that recognizes the importance of the community voice in shaping plans. This White Paper as it stands is likely to generate yet further resentment and hostility from the nation’s local communities. Is this the effect that was intended?

**The White Paper one-way consultation should be replaced with a more pro-active two-way, ongoing dialogue.** We summarize here some of these areas requiring further such dialogue:

1. Green Belt designation is effectively off limits, and any net loss could never be acceptable

2. The preservation of community assets and land bequeathed to the community, rather than being sold off.

3. Question 12 needs to greatly widen in scope. Local Plans should not be developer-led but community-led.

4. Extended mayoral powers should be used to afford protection to residents

5. Development should be guided away from protected habitats.

6. If the road transport network is already fragile and over-capacity, there should be an embargo on further housing development in that locality

7. Industrial areas should be clearly separate from residential areas, and transport infrastructure developments should by-pass residential areas.