

Date: 14 October 2011

Our ref: PL/JP/0.9

Your ref:



**Epping Forest  
District Council**

**Directorate of Planning &  
Economic Development**

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John de Wilton Preston (01992) 564111  
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Dear Sir,

### **NPPF Consultation response**

I enclose this Council's consultation response which comprises (a) the report to Planning Services Scrutiny Panel on 3<sup>rd</sup> October; (b) the appendix to that report which lists all the consultation questions and this Council's replies; (c) this Council's response to the consultation on 'Planning for traveller sites'; and (d) the covering letter for (c). The latter two items should be read in conjunction with the response to the additional question on traveller matters added by CLG after the NPPF consultation had started.

I would be grateful for confirmation, by e-mail, of receipt of all these documents before the end of the consultation deadline.

You will note that one of this Council's main concerns is the lack of suitable definition of 'sustainable development', and from media and other sources, I am aware that this concern is shared by many other authorities and agencies. If this Council chose to produce its own 'local' definition of the term, which would probably be strongly linked to the protection of the Green Belt, for use in the new local plan, is it reasonable to assume that this would be supported, rather than challenged, by PINS in line with the intention to remove power from the Planning Inspectorate (as described in "Open Source Planning" – the Policy Green Paper (No 14) published by the Conservatives in 2010)?

In a recent meeting with Bob Neill MP, Parliamentary Under Secretary of State for CLG, this Council raised concerns about the lack of any mention of a transition period after the adoption of the final NPPF. The meeting was arranged primarily to discuss the 'Planning for traveller sites' consultation and this Council's experiences of attempting to prepare a DPD on pitch provision (under a Direction from the previous Government).

Irrespective of the perceived advantages and disadvantages of that Direction, what it required was the full involvement of at least the Council's planning policy team for over 18 months and obviously seriously disrupted other work on preparing the Core Strategy for the Local Development Framework. We are consequently at least 18 months behind where we might otherwise have been. Without a transition period, and assuming that extant local plan (and alterations) policies will be abolished on adoption of the NPPF, the Council feels that it will be in a very vulnerable position until the new local plan is adopted. There is therefore a need for a transition period with a realistic time span to allow this Council, and others, to prepare new plans to make up for time lost for reasons outside their control. We request that we are given an additional 18 months for our existing 2006 amended local plan to be saved.

Yours faithfully

A handwritten signature in cursive script that reads "John de Wilton Preston".

John de Wilton Preston

**Director of Planning and Economic Development**