

Historic Towns Forum Response

National Planning Policy Framework

Consultation questions

We are seeking your views on the following questions on the Government's proposal for a new National Planning Policy Framework.¹

Email responses to: planningFramework@communities.gsi.gov.uk

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

Zone 1/H6, Eland House,

Bressenden Place

London

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(a) About you

(i) Your details

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(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response

Personal views

(iii) Are your views expressed on this consultation in connection with your

¹ (see: <http://www.communities.gov.uk/publications/planningandbuilding/draftFrameworkconsultation>)

membership or support of any group? If yes please state name of group.

Yes x
No

Name of group:

Historic Towns Forum

(iv) Please tick the *one* box which best describes you or your organisation:

- Private developer or house builder
- Housing association or RSL
- Land owner
- Voluntary sector or charitable organisation
- Business, consultant, professional advisor
- National representative body x
- Professional body
- Parish council
- Local government (i.e. district, borough, county, unitary, etc.)
- Other public body (please state)

Other (please state)

(v) Would you be happy for us to contact you again in relation to this consultation?

Yes x
No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

General Comments from the HTF

The Historic Towns Forum welcomes the chance to comment on the National Planning Policy Framework. While there is much in the NPPF that is uncontroversial, drawing on existing policy, there are many unsatisfactory elements that the HTF is concerned about and feels need further clarity. Some of these elements are matters of principle and some of detail.

The HTF is concerned that the Government is proceeding on the assumption that the "problem" of the planning system is that the existence of over detailed extensive guidance and policy causes uncertainty, disputes and delays. An alternative view is that the "problem" (if that's what it is) of the planning system is that people often disagree strongly about the nature of change in their environment. The idea that the replacement of 1000 pages with 50 pages will fundamentally streamline the system is mistaken - all the battles will still be fought, only the language of the arguments, for which there will be much more room in the NPPF, will change. Generalities like 'sustainable development' are not lawyer proof whereas more detailed and precise wording has a chance of being so.

It is unfortunate that the NPPF (Government) does not recognise that planning approval does not necessarily mean that the market will subsequently deliver development on site. The planning system should not be blamed; other factors need to be addressed. The downturn in the economy has led to a drop in housing delivery, not the planning system, and it should be acknowledged that developers and landowners control the supply of housing in order to maintain house prices in market areas.

The NPPF falls into the trap of equating brevity with clarity, consequently the document is less clear than existing policy and is too open to interpretation. Planning is a process dealing with complex interacting systems and the policies and guidance must reflect this or too much will be left open to question. To enable economic development, investment and growth, which is the intention, the planning system needs to provide clarity, certainty and consistency. This is essential for creating investor confidence. It is likely therefore that the NPPF will have a negative impact on investor confidence and the speed and effectiveness of planning – there will be less certainty and more confusion.

On the question of clarity:

- the NPPF falls down badly in not distinguishing between discussion, evidence, polemic and policy; the structure and design of the final NPPF must set out policies clearly;
- it will be helpful to spell out the relationship to other government policy statements.

~~In relation to the last bullet point the HTF believes that the NPPF should cover all forms of land~~

There is an imperative need for Government to understand the relationship between the quality of the built environment (old and new) and an area's ability to attract investment. It is essential that planning provides the certainty and level of quality assurance necessary to create conditions for entrepreneurial activity. The worry is that the NPPF could actually undermine the ability of many areas to attract jobs and investment.

In addition it should be written to apply to all of the country, not just higher growth areas like the south-east. Town and country planning should be a single activity. Our urban and rural settlements are mutually dependent. National planning policies must strengthen the bonds between communities and not become a means of exclusion.

The HTF feels that much higher priority should be given to the importance of design and heritage protection. The role of both in securing growth and regeneration, both physical and economic, should be recognised. At present there is little understanding of this in the document.

(b) Consultation questions

Delivering Sustainable Development

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

1(a) – Do you agree?

- | | |
|---------------------------|--------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | x |

1(b) Do you have comments? (please begin with relevant paragraph number)

The general principle of streamlining the national policy Framework is supported, but there is a concern about the balance struck by the draft between streamlining, providing sufficient certainty for decision making and a robust approach to sustainability. There are concerns that the way in which the presumption in favour of sustainable development is couched may lead to a greater number of planning applications being determined by appeal, which runs counter to the ideals of localism and the desire for a simpler, more efficient planning system.

Moreover, the NPPF is confusing in referring to 'sustainable development', 'sustainable growth' and 'sustainable economic growth'. There is a need for a clear and consistent understanding of sustainability and the Government could do far worse than build on the robust approach set out in existing Planning Policy Statements.

Throughout the draft Framework, the planning system is seen as an impediment to growth and seriously undervalues its enabling and promotional roles. This fails to recognise the value attached locally by communities to their local environment and the importance of a quality environment in encouraging investment.

Paragraph 13: This bends and weakens the presumption in favour of sustainable development, by suggesting that planning for prosperity is more important than planning for people and planning for places. The challenge is effectively to balance interests and take a long term view. 'Sustainable development' no more means allowing all development than it means no development.

Paragraph 14: This states that there is a presumption in favour of sustainable development and later says permission should be granted where the Local Plan is absent, silent or where relevant policies are out of date. This is of particular concern, especially when read with paragraph 26 concerning the definition of up-to-date plans. Applications should be refused where they would cause harm, regardless of the status of the plan. Also, the requirement to consider adverse impacts against the policy statement as a whole could be seen to downgrade issues like Green Belt protection, heritage protection, design and town centre interests. New Local Plans will take time to prepare and adopt. This must not be allowed to lead to an increase in the overall number of appeals. Planning by appeal is not the way to deliver high quality schemes, which both support economic growth and empower local communities. The Framework should allow for a transitional period for new plans to be brought forward and adopted in conformity with the NPPF. In parallel, in order to avoid a policy vacuum, existing development plans should maintain their status for the transitional period.

The inclusion of the phrase 'would significantly and demonstrably outweigh the benefits' fundamentally undermines the principle of balance and the precautionary principle that underpin a robust approach to sustainable development.

It is vital that LPAs do not face an onerous process to make sure that their plans comply with the NPPF. However, it is not clear whether the certificate of conformity will apply to all authorities or only those with an adopted Core Strategy. The latter position needs to be avoided. The conformity process needs more consideration and should be open to all Councils. A transitional period would support this and avoid a local policy vacuum.

Paragraph 19:

- The core planning principles do not make any reference to the role of planning in adapting to and mitigating the effects of climate change. This fails to reflect the significant role that planning has to play in responding to the challenges of climate change.
- The emphasis that planning decisions should be 'plan led' is welcomed but the lack of resources in LPAs due to public sector spending cuts will limit capacity to achieve widespread coverage of up to date plans for some time to come. The NPPF is neither sufficiently detailed nor relevant to local circumstances to fill the gap and relevant regional strategies are to be abolished.

Plan-making

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

2(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

2(b) Do you have comments? (please begin with relevant paragraph number)

The HTF welcomes the Government's continued support of the plan-making system, but seeks clarity on a number of issues.

Paragraph 21: Supplementary Planning Documents (SPD) are valuable, accessible and relevant tools that provide the means to provide additional detail inappropriate to include in a Local Plan. The statement that SPDs should not be used 'to add to the financial burden on development' is not constructive. SPDs aim to provide clarity in the development process. The discouragement of SPDs would only be sensible if national policy was more detailed. Whilst some LPAs have over-complex layers of SPDs, the focus should be on avoiding overlap and repetition, not discouraging SPDs

Paragraph 24: The HTF is pleased to see that policies can seek environmental enhancement (final bullet point).

Paragraph 26: With regard to LPAs seeking a certificate of conformity for their development plans, paragraphs 26 and 62 of the draft Framework raise concerns that this would mean that only a new Local Plan could be found to be in conformity. This would have significant resource implications for LPAs and could leave a policy vacuum, which would only serve to create further uncertainty and delay in the planning process. More clarity on the whole process is required.

Paragraph 37: Evidence is not just about the significance of heritage assets, but their condition and potential to support regeneration and adaptation.

Paragraph 39: This refers to the need for a willing landowner and willing developer to be able to make 'acceptable returns.' It is not possible to accurately determine the overall costs of bringing sites to the market at the plan-making stage and it is therefore impossible to determine at that stage exactly what returns the landowner and/or developer will make. However, high level viability work at the plan making stage is an important consideration and Community Infrastructure Levy charges should be worked up at the same time and tested alongside a Local Plan.

Paragraph 40: This refers to the CIL, but does not address areas where, mainly through local economic circumstances, there is little or no potential to raise funding through the CIL.

Paragraphs 44-47:

- These are wholly inadequate for addressing strategic planning issues. This is a serious inadequacy in the document which potentially undermines the economic aims stated elsewhere, which rely on robust strategic planning.

- These are weak mechanisms to support co-operation across LPA boundaries in the absence of a formal common plan dealing with identified „strategic priorities’. How will these common policies be tested and co-ordinated comprehensively if they are in individual plans that reach examination at different times? This will not work in practice.

Paragraphs 49-52: These are very disappointing. They fail to address the need for front-loading of community engagement - far more important to democratic legitimacy than the referendum (likely to be a waste of money), and essential if plans are to be realistic and to address local aspirations. Nor is the issue of the evidence base at neighbourhood level addressed.

It is not clear whether neighbourhood plans will also be subject to the tests of soundness highlighted in paragraph 48. As neighbourhood plans will be creating new planning policy, they must surely go through the same rigorous process as local plans.

The policies for planning strategically across local boundaries provide a clear Framework and enough flexibility for councils and other bodies to work together effectively.

2(c) Do you agree?

- | | |
|---------------------------|--------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | x |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

2(d) Do you have comments? (please begin with relevant paragraph number)

The HTF supports strongly the principles behind the cross boundary approach to planning. However, whilst some LPAs may co-operate to a point, it may not always be possible to reach agreement or consensus on cross boundary issues. Will this be taken into consideration as part of the examination process and will other sanctions for noncooperation be considered?

Decision taking

In the policies on development management, the level of detail is appropriate.

3(a) Do you agree

- | | |
|---------------------------|--------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | x |
| Strongly Disagree | <input type="checkbox"/> |

3(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 56-77: Generally, there is a fundamental misunderstanding of front-loading. Front-loading occurs at the beginning of the process, before policies are written and plans are drawn up. The pre-application stage occurs far later. Indeed, it is little different from the application stage if a scheme has already been prepared. The emphasis should be on the pre-design stage, not pre-application. Also, the issue of communities being excluded at the pre-application stage is not addressed.

Paragraph 58: This conflicts with paragraphs 64, 69 & 70. 58 in saying that „Consents relating to how a development is built or operated can be dealt with at a later stage’. Apart from lacking clarity as to the form of consents discussed, when combined with the current target driven system, it puts even greater emphasis on the need to have conditions on decision notices where fine detail cannot be worked out either at pre-application stage or during the target period. This also needs to be cross-referenced to concerns about how amendments are to be managed.

Paragraph 62: This paragraph makes no mention of existing development plans. It cannot be the intention that only new Local Plans will be the starting point for the determination of planning applications. This effectively amounts to the withdrawal of all existing documents which form the Development Plan. A solution could be to amend the Framework to allow for a clear transitional period for new plans to be brought forward.

Paragraph 64: With reference to the final sentence on the restriction of permitted development rights by planning condition, it is considered that this use of conditions to restrict/remove permitted development rights remains a very effective planning tool. This opportunity can be vital on constrained sites, e.g. where overlooking and loss of amenity would be caused by further extensions to houses.

Paragraphs 70: The draft Framework places an emphasis on not 'burdening' a development with so many conditions and obligations that it is rendered undeliverable even though it might otherwise have been acceptable. The paragraph in the draft Framework has the hopefully unintended effect of appearing to favour a reduced level of condition/obligation, which in turn increases risk to the quality of local environment and infrastructure, due to lack of mitigation. The HTF favours emphasis being given to the need to impose obligations in keeping with Community Infrastructure Regulations 2010/11 and the need to be reasonable in imposing conditions. The references to threatening viability should be removed. Where reference is made to viability, this should relate not only to short term economic issues. Poor development decisions can have an impact on social and environmental infrastructure in both the long and short term.

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

4(a) Do you agree

- | | |
|---------------------------|--------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | x |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

4(b) What should any separate guidance cover and who is best placed to provide it?

While the general principle of streamlining the national policy Framework is supported by the HTF, the Framework does not strike the right balance between streamlining and providing sufficient certainty for decision making. It would benefit from greater clarity overall in order to ensure high quality sustainable development is achieved through the planning system.

Any guidance needs to have:

- the full endorsement of the Government if it is to have any credibility;
- be accepted as a major material consideration in decision making; and
- should also be subject to full consultation with key stakeholders.

It is unclear why all guidance should necessarily be light-touch. The level of detail must be appropriate and proportionate to the technical complexity of the issues involved.

The HTF is keen to assist the preparation of guidance and has already worked with English Heritage and other bodies in preparing a practice guide on heritage issues.

Business and economic development

The 'planning for business policies' will encourage economic activity and give business the certainty and confidence to invest.

5(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

5(b) Do you have comments? (please begin with relevant paragraph number)

The planning system is not the main problem facing the economy. In historic towns, many of which are comparatively prosperous, maintaining a high quality environment is both important to local communities and is central to supporting economic growth.

Paragraphs 14, 48, 73 & elsewhere: These paragraphs use varying wording about meeting need. There is a danger that this repetition of slightly varying phrases and emphasis will lead to increased confusion. Where the Framework considers planning to meet forecast need, the same wording should be used in each instance. The emphasis must be on seeking to meet needs subject to the benefits to the whole community outweighing any adverse impacts.

Paragraph 73: There is no recognition of community/third sector-led growth and social enterprise.

Paragraph 74: The success of this paragraph will be hugely dependent on whether or not an applicant is co-operative and is willing to discuss realistic solutions. This is not the sole responsibility of the LPA.

Paragraph 75: The Framework states that "Planning policies should avoid the long term protection of employment land or floorspace..." What is the definition of long term? Is it longer than a plan period? Current good practice requires allocations to be reviewed as part of the plan making process. Where there is an identified need for business premises and land now and in the me-

dium term, the ability to protect employment land and floorspace is important in maintaining a supply of land to meet the needs of businesses in the area. Not being able to protect employment land will discourage economic activity, remove certainty that suitable land will be available in the future and hence discourage business investment. This undermines the growth objectives of the document: allowing loss of employment land/buildings to cater for short-term trends will compromise longer-term growth capacity. The NPPF also runs the risk of removing local planning authorities' ability to use discretion when determining the appropriateness of development proposals in order to balance the needs of all stakeholders. This is at odds with Localism and the definition of sustainable development and the need for balance.

5(c) What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

Planning must be informed by market signals and seek to work with them, but should not be *driven* by them. Markets do not address effectively matters such as the value attached by local communities to the historic environment, open space, local amenity and the countryside.

Short term market signals can change too quickly to be relevant to plan making which is intended to provide a medium to long term Framework for development. Plans need to address the whole economic cycle and be informed by signals that are evidence based.

The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.

6(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

6(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 76: The HTF is concerned that the fifth bullet point seems to indicate that needs should be met in full and not be subject to the availability of appropriate sites. The Framework should recognise that plans should only seek to meet needs subject to the benefits to the community outweighing any adverse impacts. Unsuitable sites should not be allocated in order to fully meet the needs, as this could impact adversely on the vitality and viability of town centres and the aims of sustainable development. There is no real recognition of the radically changing role of town centres.

Paragraphs 77, 78, 79 & 80: The HTF supports strongly the town centre first approach. However, the Framework does not contain any guidance on how the sequential approach or impact test should be applied. Without this there is a lack of clarity for stakeholders, which could lead to increased appeals and delays in development.

The NPPF should be clear that local planning authorities should require developers to provide a sequential assessment to support their planning application if the site is not located within a town centre. The current text is ambiguous as to who will assess potential sites. This should not be left to the local planning authority and the onus must be on the developer putting forward a site to

show that it is the most sequentially preferable site. Without this detail there will be a lack of clarity for stakeholders could lead to increased appeals and delays in development.

There are also concerns that the removal of offices from the town centre first approach could lead to the increased development of out of town business parks. This would have a subsequent environmental impact, for example increased reliance on private modes of transport leading to increased congestion and a reduction in local air quality. Such an approach would not be in keeping with the principles of sustainable development.

The NPPF should make reference to the proposed Cambridge Amendment to the Localism Bill, which seeks to promote retail vitality and diversity through the development of local level policies.

An area of activity completely absent from the NPPF is tourism (apart from one reference to rural tourism). This is a curious oversight given the Government's recent pronouncements on the importance of tourism to the national economy. Tourism is a multi dimensional activity interacting with many sectors of the economy and it has several strong interactions with planning:

1. It looks to the longer term and helps to avoid short term decision making that can harm the very qualities on which tourism depends, while recognising that some projects take years to deliver.
2. It identifies land for development, e.g. sites for hotels and leisure activities.
3. It identifies the need for and facilitates the delivery of transport infrastructure, e.g. new roads, public transport and park and ride.
4. It makes and shapes the overall place helping to maintain and improve the attractiveness for visitors, e.g. the town centre first approach to retail development.
5. It conserves heritage by preventing its destruction and facilitating regeneration around heritage assets.
6. It recognises and addresses climate change issues to help mitigate and adapt to the worst impacts, e.g. promoting walking and cycling for visitors and addressing flood risk.
7. It provides a broad Framework for tourism development by fitting the activity into the wider social and economic development of a town, e.g. meeting the needs of tourism within a wider development Framework.

The NPPF needs therefore to address tourism issues and assist in providing a Framework for its sustainable development. From the HTF's perspective, aspects of this should be incorporated in an improved town centre first policy, e.g. on the development of hotels. Planning has a vital part to play in effective destination management and this should be endorsed through the NPPF.

Throughout the sections on economic aims, town centres, etc. there is no recognition of the role of heritage.

Transport

The policy on planning for transport takes the right approach.

7(a) Do you agree?

- | | |
|---------------------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | |
| Strongly Disagree | x |

7(b) Do you have comments? (please begin with relevant paragraph number)

The Framework needs to be stronger on sustainable transport.

A key requirement is to recognise and stress the importance of an integrated approach to development and transport. This may be fundamentally undermined by the presumption in favour of sustainable development where this leads to consent for development in an uncoordinated way that is not related to the provision of transport infrastructure. The relationship between transport capacity/impacts and the granting of planning consent is critical, see questions below.

Whilst there are mentions of sustainable modes, they are ambiguous. Sustainable transport, and the need to make development sustainable, should be at the centre of every policy. Sadly the draft Framework uses terms like "where reasonable to do so". This is risible considering the overarching nature of the proposed *National* Framework, which should set the best possible practice. Sustainable transport can facilitate sustained economic growth and should not be treated as a „nice to have’.

Paragraph 83: Terms such as “where possible” and “where reasonable to do so” are not strong enough to encourage and ensure reductions in green house gas emissions from transport.

Paragraph 84: The social role of transport should be a third objective.

Paragraph 85: The HTF supports this paragraph, but stresses that this infrastructure needs to be both suitable and sustainable.

Paragraph 86: The HTF agrees that transport assessments should be provided for all developments that generate significant amounts of movement, however, this paragraph says „development should not be prevented or refused on transport grounds unless the residual impacts of development are severe’. This is ambiguous and needs further explanation. What is severe? It does not take into account local circumstances. It is not clear whether the adverse transport/highways implications of a development, which cannot be ameliorated, will be adequate grounds for refusal of planning consent. They should be.

Paragraph 88: The term “significant movement” needs clarifying. What is it? What levels are significant movement based on? Is it different for each locality?

Paragraph 89: Pedestrians and public transport are mentioned, but far more needs to be made of social objectives.

Paragraph 93: It could be counter-productive to the aims of many local authorities in historic towns to promote sustainable transport to consider local car ownership as a key consideration for setting local car parking standards. When applying locally derived standards, there will also be a need to take account of the density and design of development. Moreover, there is no mention of cycle parking standards in the draft Framework. This is surprising given the emphasis on health and well-being in the rest of the document, and the importance of safe and secure cycle parking to the number of people that choose to cycle.

Communications infrastructure

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

8(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

8(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 95 to 99: The HTF is very concerned to see that the limitations on the visual intrusion of telecommunications infrastructure and the development of such infrastructure in designated areas appear to have reduced in the Framework. In order to ensure protection of Conservation Areas, the Green Belt, Sites of Special Scientific Interest and areas and buildings of architectural, historic or landscape importance, the HTF urges the inclusion of something covering these issues at the end of paragraph 96, e.g. „Particularly in designated areas, Including Conservation Areas, National Parks, Areas of Outstanding Natural Beauty, Green Belts, Sites of Special Scientific Interest, Heritage Coasts, areas of high landscape quality and sensitivity and in the proximity of other heritage assets such as Listed Buildings, the aim should be for apparatus to blend into the environment’.

Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

9(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 102:

- In the 1st bullet point, the HTF considers that this should make reference to Sites of Special Scientific Interest.
- The HTF welcomes the recognition of the necessity of safeguarding minerals of importance to heritage assets in the 3rd bullet.
- The 6th bullet point refers to environmental criteria being applied to minerals planning applications to avoid adverse effects on the natural and historic environments and human health. If an allocation for minerals extraction has already been made, the planning application stage would be too late to introduce these criteria. This should be a two-stage process and such environmental criteria should be included in paragraph 101 in the criteria relating to the preparation of minerals plans. Failing to assess an allocation against these criteria would result in wasted time and costs being incurred by a developer at the planning application stage.

Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

10(a) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

10(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 107-113: These are written with a strong South East bias. For example, if the former housing pathfinder areas are considered, the policy has little relevance to the kinds of issues that need to be addressed. The policy needs to be wider in scope so as to be relevant outside of high-growth areas.

Paragraph 109: The Framework needs to recognise that it is not always practical for Local Plans to meet the full requirements for market and affordable housing in the housing market area. The limited availability of suitable sites is a practical constraint. The emphasis should be on seeking to meet needs subject to the benefits outweighing any adverse impact, e.g. on the environment. It is also important that local communities have a say when decisions are made. This will give clarity to stakeholders and allow the LPA to continue to plan to meet housing needs as much as is possible within the local conditions.

- In the second bullet point, the proposed addition of at least 20% extra deliverable sites is not supported. It is not justified by any evidence that it will work to increase housing delivery. It is an arbitrary, centrally imposed figure that may well be resented by local communities. An arbitrary increase in the (theoretical) supply of land will weaken longer term spatial local planning as developers seek to concentrate more house building in locations favoured by the current market.
- In relation to the seventh bullet point, the HTF strongly supports the policy of bringing back into use empty homes.

Paragraph 117: Design codes are generally very detailed and prescriptive. The NPPF might more usefully support the preparation of design guides.

Glossary: The definition of Affordable Housing (page 53) differs from that added to the recently updated PPS3. It refers to: 'Social rented, affordable rented and intermediate housing, provided to *eligible* households whose needs are not met by the market. *Eligibility* is determined with regard to local incomes and local house prices'. In PPS3, it was *availability* that was determined in this way. The new definition appears to be contrary to the Government's proposals to give local authorities the power to determine their own eligibility criteria to meet local needs.

Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

11(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 127: The HTF is concerned about the reference to „very significant weight’ being given to the desirability of establishing new schools. The Framework does not say what forms of school are covered by this paragraph. In a number of historic towns there is a significant presence of language schools and tutorial colleges, which largely do not serve the local population. Whilst such businesses support the local economy, they also have impacts on the local infrastructure, particularly in terms of availability of accommodation and loss of local amenity. This should be clarified.

The design of new schools is vital and should be covered in the Framework.

Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

12(b) Do you have comments? (please begin with relevant paragraph number)

The Design section captures the essence of good design and inclusion of the „function’ of places is welcome. Paragraph 116 of the Framework suggests that greater emphasis is being placed on ensuring that policies at the local level are robust and comprehensive, which is sound.

There is no mention of *By Design* and *Building for Life*, which are regrettable omissions.

It would be good to see more emphasis on urban spaces, in addition to green spaces. The importance of urban design should be stressed.

Paragraphs 114-123: Generally, there needs to be recognition of the importance of design to economic objectives. In para 122, it would be useful to emphasise that community engagement should take place before plans are developed. Early community engagement can influence fundamental factors like layout. Late community engagement is often concerned with aesthetics, there being only limited scope to change fundamentals.

Paragraph 114: The importance of adaptable places, previously included in PPS1, has been omitted. The adaptability of buildings is an important consideration to ensure sustainable devel-

opment can be delivered in the future and reference should be made to it in Framework. There should also be clear reference to disability access and the importance of a high quality public realm.

Paragraph 116: The list contained within the Framework is crucial to the overall guidance and cover, albeit at a high level, for the key areas for design consideration. However, the HTF is concerned that some LPAs without strong policies will struggle to counter poorly designed schemes. The text of the NPPF need to be tightened to provide better national guidance.

- 3rd bullet the HTF suggests that this should be more explicit about responding to local context and character to understand the identity of local surroundings.

Paragraph 121: The Framework states that „permission should be refused for development of obviously poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions’. This statement could allow what are at best mediocre projects to be permitted. PPS1 emphasised that design which is inappropriate in its context should not be accepted. The HTF considers that this aspect needs to be strengthened in the Framework. However, the question is how this will be weighed against the „presumption in favour of sustainable development’ and if no up to date local plan policies are available.

Green Belt

The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.

13(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

13(b) Do you have comments? (please begin with relevant paragraph number)

The HTF welcomes continuation of protection for Green Belts, though there are reservations.

Paragraph 145: This links back to paragraph 3.12 of PPG2, which assumes that engineering operations constitute inappropriate development unless they maintain openness and do not conflict with the purposes of including land in the Green Belt. The Framework appears to turn this on its head, by assuming that development “is also not inappropriate.” The HTF believes that this weakening of the approach to engineering operations unhelpful. In addition:

- on the reuse of buildings, useful information has been lost from paragraph 3.7 of PPG2;
- the criteria in PPG2 paragraph 3.7 and Annex D were useful for decision-making on planning applications - the loss of these criteria and the annex will result in greater uncertainty for both developers and decision-makers; and
- the final bullet point of the paragraph relates to development brought forward under a Community Right to Build Order; the Council is concerned that developers have the right to bring forward these orders and this may be against the wishes of the local community, which appears contrary to the aims of Localism.

Paragraphs 146 – 152: There could be a conflict between the aims in paragraph 152 (Climate change, flooding and coastal change) and the references in paragraph 146 to many elements of

renewable energy projects being inappropriate in the Green Belt. This appears to rule out all scales of low carbon and renewable energy development, and makes no distinction between say a large wind farm and a residential property proposing to generate energy through the use of small to medium scale wind.

Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

14(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

14(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 148: The Framework does not give sufficient consideration to the wider role of planning in responding to climate change. Little consideration is given to the role of planning in enabling climate change adaptation strategies to be put in place in both new and existing communities, and what consideration there is has focused too narrowly on flooding and coastal change. There needs to be wider recognition of the role that planning for new communities has to play in helping the transition to a low carbon society - not just the low carbon economy. Paragraph 148 needs significant change to reflect a proactive role for planning.

Paragraph 150: While the HTF supports the setting of local requirements in line with nationally described standards, it is unclear if LPAs will be able to set standards in advance of the national zero carbon timetable, where justified and supported by evidence. PPS1 is clear that such an approach is appropriate (paragraph 31, PPS1 Supplement). The ambiguous nature of the wording of paragraph 150 could stifle the development of innovative policies on standards for the environmental performance of new buildings and opportunities to deliver truly exemplar developments will be lost. The wording of paragraph 31 of the PPS1 Supplement should be reinstated - without this Local Plans will be open to challenge.

Paragraph 151: This is worrying, potentially providing a route to off-the-peg designs to be imposed in different localities, without consideration of local circumstances. There is no reason why sustainable development should not be designed for the specific locality.

The policy on renewable energy will support the delivery of renewable and low carbon energy.

14(c) Do you agree?

- | | |
|----------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |

- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(d) Do you have comments? (please begin with relevant paragraph number)

Paragraph 152: The HTF supports the general approach but notes:

- there is to be no justification for singling out deep geothermal energy over other technologies;
- there could be reference to developments being required to connect to existing decentralised renewable or low carbon energy where capacity exists;
- a case for addition of a bullet safeguarding renewable and low carbon energy supplies and the avoidance of development that would have a detrimental impact on existing or planned renewable and low carbon energy infrastructure; and
- the need to address the conflicts between paragraphs 146 and 152 mentioned above.

The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities.

14(e) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(f) Do you have comments? (please begin with relevant paragraph number)

The HTF supports the recommendation for a consistent methodology to be applied to renewable energy proposals outside of opportunity areas identified by local authorities.

There is a need for greater clarity about the evidence base that LPAs need to have in place to support their climate change policies. The current Framework (the PPS1 Supplement) provides a much clearer indication of the requirements to support the development of policy.

The policy on flooding and coastal change provides the right level of protection.

14(g) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree

Strongly Disagree

x

14(h) Do you have comments? (please begin with relevant paragraph number)

Paragraph 154: The HTF considers that climate change adaptation and flooding should be dealt with as separate topics within the Framework. As it stands paragraphs 154 – 158 represent an incomplete summary of the role of planning in adapting to climate change and does not work as a separate section.

Paragraphs 154 – 158: This is an incomplete summary of PPS25 and does not work as a standalone section. This is a missed opportunity to update national planning policy regarding flood risk management.

Paragraph 154: There are no definitions of 'vulnerability', 'strategic flood risk assessments' or 'site-specific flood risk assessments', which are key components in assessing the risk of flooding.

Paragraph 156: The language used throughout this section of the Framework, particularly in paragraph 156, implies that flood risk can be avoided. It cannot, it can be only managed.

Paragraph 157: The draft Framework seems very much focused on the risk of fluvial and coastal flooding. There is no reference or consideration of the risk from surface water flooding or any other sources of flooding, which is only representative of a portion of the overall risk from flooding.

Natural and local Environment

Policy relating to the natural and local environment provides the appropriate Framework to protect and enhance the environment.

15(a) Do you agree?

- | | |
|---------------------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | x |
| Strongly Disagree | <input type="checkbox"/> |

15(b) Do you have comments? (please begin with relevant paragraph number)

In the presumption that all sustainable development is good, the onus appears to be on the LPA to prove that a development is not sustainable, whilst limiting the information the Council can request in support of a proposed development. Moreover, there is concern that insufficient account has been taken of the precautionary principle, with too great a weight attached to development and insufficient consideration given to cumulative harm to a site by a series of smaller developments.

Paragraph 130: With reference to the proposed designation of Local Green Space, whilst the opportunity presented to local communities appears on the face value to be welcome, the HTF questions what the very special circumstances are, which would allow the loss of land designated as Local Green Space to new development. Without guidance it will be difficult for the LPA to safeguard land designated as Local Green Space.

Paragraph 131: Unfortunately, the criteria for designation of Local Green Space lack clarity in how LPA should use them and the statement „will not be appropriate for most green areas or open spaces’ undermines the concept of designating areas of green space to develop networks of green infrastructure

Paragraph 132: This paragraph and the final bullet point of the preceding paragraph 131 are not sufficiently clear. Do these two paragraphs allow the same forms of development as potentially appropriate in the Green Belt to potentially be appropriate in a Local Green Space?

Paragraph 166: The HTF supports reference made to locally developed criteria.

Paragraphs 171, 172, 173, 174 and 175: These paragraphs are acceptable as guiding principles, but a key concern is that without more detailed guidance it will be necessary to specify in the Local Plan all the relevant standards and codes of practice the Council may rely on when considering an application. Therefore, whilst the guidance at a national level is reduced, it will only be increased at a local policy level.

Historic Environment

This policy provides the right level of protection for heritage assets.

16(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input checked="" type="checkbox"/> |

16(b) Do you have comments? (please begin with relevant paragraph number)

The HTF welcomes the inclusion of key considerations from PPS 5 in the Framework. However, there is a strong presumption in favour of development, which could give rise to the historic environment not being given the level of consideration it needs and deserves. There is a lack of advice for development management in terms of proposals, which have some impact on the historic environment.

The text does not recognise the contribution heritage makes to economic objectives and in helping places to adapt to modern needs. The utility value of heritage needs to be emphasised. The overall aim of policy should be to reconcile special interest with utility value and other spatial planning objectives. Generally, there needs to be more emphasis on the economic, social and environmental (sustainability) benefits heritage delivers.

In addition to the comments set out in this section the HTF endorses the detailed wording changes put forward by English Heritage.

Paragraph 177: In order to link the development of the evidence base to reasoned decision-making, it would helpful to expand the 2nd bullet point of this paragraph to refer to contributing to our knowledge and understanding of our past by capturing evidence from the historic environment, using this information in decision-making and making this information publicly available, particularly if a heritage asset is to be lost.

Paragraph 178: This paragraph appears to have lost some of the strength of purpose of HE3.1 (PPS5). It would be useful to make reference to the need for a positive and proactive strategy

and it would also be constructive to clarify where the LPA should set out such a strategy, given the Framework's position on Supplementary Planning Documents. There is also a lack of clarity in this paragraph as to whether the strategy is quite generic or is tailored towards a specific area's character(s).

Paragraph 181: This paragraph should also apply to plan making, as heritage assets will need to be considered when allocations are made.

Paragraph 182: The HTF welcomes the reference to "deliberate neglect of or damage to a heritage asset."

Paragraph 183: Although the draft Framework deals with substantial harm being caused to a heritage asset, it fails to consider those decisions which might affect an asset to *some* extent. Over time, the setting or importance of a heritage asset might be reduced by cumulative smaller impacts. Protection against these smaller impacts needs to be stated expressly. Para 183 does not mention Conservation Areas, leaving them in a vulnerable position. It is necessary to mention the importance of preserving features and townscape recognised in a character appraisal as contributing to the special interest of an area.

Paragraph 185: This concerns the HTF as it potentially justifies loss of heritage. More emphasis needs to be put on heritage as a means to some of the most sustainable forms of development and regeneration.

Paragraph 187: This does mention Conservation Areas – perhaps this could be integrated with paragraph 183.

Glossary: The glossary defines „designated heritage assets' and „heritage assets' but not „un-designated heritage assets'. Additionally, the glossary does not explain the difference between „identified' and „designated'. On the subject of local listing of buildings, the glossary states that this takes place through the plan-making process. This may allow the loss of some buildings, worthy of local listing, if they are not assessed during the plan-making process – the flexibility of an ongoing process is required. If the term significance is to be used, it is necessary to relate it to the wording of the statute (special architectural or historic interest). The definition in the glossary fails to do this.

Impact assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

The Government has noted that the presumption in favour of sustainable development could lead to more appeals against planning decisions. This is not reflected in the Impact Assessment.

The impact assessment, and indeed the Framework, are very much focused on the delivery of identified development needs, but seem to overlook the fact that what is needed may not necessarily equate to what can be accommodated and delivered in a manner that provides a balance between economic, social and environmental issues.

The impact assessment seems to imply that low levels of housing delivery are the fault of the current planning system, with no consideration to the role of the market, developers' practices and economic downturn. The allocation of land for new development within Local Plans does not

necessarily imply that the market will deliver housing on these sites.

The impact assessment states that the objective is to secure more and greater coherence of strategic networks of green infrastructure by planning positively for their creation, protection, enhancement and management. This objective does not come through strongly in the Framework, with the Local Green Space designation appearing somewhat random with little thought given to how this would promote effective networks of multifunctional green infrastructure.

Planning for Travellers

18 Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

The draft planning policy for traveller sites is just over six pages long in contrast to the 2.5 pages devoted to housing in the Framework. This might indicate a need to further consolidate and streamline planning policy for traveller sites to make it consistent with the final version of the Framework. Any loss of detail could be covered in additional good practice guidance. It would be a retrograde step to maintain a separate planning policy document for travellers for equality reasons.

Specific questions on the impact assessment

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

No comment

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

No comment

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

No assumptions have been made about the need for a wide range of built and natural environment professionals to spend time familiarising themselves with the Framework.

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

No comment

QA5: What behavioural impact do you expect on the number of applications and appeals?

An increase in the number of applications and appeals.

QA6: What do you think the impact will be on the above costs to applicants?

No comment

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

No comment

QB1.1: What impact do you think the presumption will have on:

- (i) the number of planning applications;
- (ii) the approval rate; and
- (iii) the speed of decision-making?

The number of planning applications will increase, with a reduction in the number of approvals. The speed of decision making will depend significantly on whether the Local Plan is in conformity with the Framework.

QB1.2: What impact, if any, do you think the presumption will have on:

- (i) the overall costs of plan production incurred by local planning authorities?
- (ii) engagement by business?
- (iii) the number and type of neighbourhood plans produced?

Producing one Local Plan rather than a Local Development Framework suite of documents will reduce costs, particularly if the evidence base is more proportionate. This may assist business engagement.

The problem that may arise from the 'presumption in favour of sustainable development' where the local plan is absent, silent or out of date is that not even up to date plans can have policies relevant to all development possibilities. This may lead to lengthy local plans that try to anticipate every possible development and this will be counterproductive – they will take longer and be more costly to prepare.

Most LPAs will already have produced a number of recent planning documents. The situation regarding conformity and the existence of any transitional period is key to providing certainty to local communities and allowing LPAs to understand the likely costs of plan production.

No definitive opinion on the number of Neighbourhood Plans likely to come forward is possible

until there is more clarity on the cost of their production.

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

As currently worded, the presumption in favour of sustainable development tips the balance in favour of economic outcomes to the detriment of environmental and social outcomes as well as longer term economic outcomes.

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

The presumption, read together with paragraph 26 which, seems to say that only new Local Plans will be up to date, and paragraph 62 which ignores existing Development Plan Documents, will give developers confidence to make planning applications on sites opposed by the public, not included in adopted Development Plans or which may have been rejected in the past. The number of appeals will increase significantly.

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

No, it underestimates the increased costs of familiarisation with the Framework, and the costs of longer plans and increased number of planning applications and appeals.

QB2.2: Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

No comment

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

No comment.

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

No comment

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

No comment

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

It is important to retain a presumption in favour of development on previously developed land in preference to greenfield development. This is consistent with the principle of sustainable development through:

- making effective use of the scarce resource that land represents;
- reducing the loss of valued open space and agricultural land;
- encouraging more compact developments, which helps in promoting sustainable living and sustainable transport; and
- achieving environmental improvements.

A standard, or at least a firm general policy commitment, should be included in the NPPF. When re-drafted, the Framework should give local planning authorities the ability to require new development to reuse previously developed land before building on greenfield sites.

QB3.2: Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

See comment above

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

No comment

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

No comment

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

No comment

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

No comment

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

No comment

QB4.1: What are the resource implications of the new approach to green infrastructure?

No comment

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

No comment

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

No comment

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

No comment

QB4.5 Will your approach to renewable energy change as a result of this policy?

No comment

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?

No comment