



BATH PRESERVATION TRUST

Towards a better NPPF?

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What's right with the current draft?

- Laudable aim of simplifying and clarifying planning policy
- Historic Environment and Green Belt still have some special protection
- ...er

What's wrong with the current draft?

- 'Presumption of yes' – particularly when local plan is '***silent, absent, indeterminate or where relevant policies are out of date***'
- Definition of sustainability (dominance of economic criteria)
- Loss of national policies
- No practitioners guide or transitional arrangements
- Based on some dubious assumptions confusing failings of process with policy

What's the most outrageous thing in the current draft? (Quiz)

- Removal of brownfield before greenfield
- *“Supplementary planning documents should only be necessary where their production can help to bring forward sustainable development at an accelerated rate, and must not be used to add to the financial burdens on development”.*

Our submission

- Brevity ≠ clarity
- Query ‘presumption’ and evidence base (rewrite para 14)
- Challenge sustainability definition (rewrite para 14)
- Highlight impact on Bath World Heritage Site
- The need for transitional arrangements