

## Responding to the NPPF consultation

### Notes from the event

#### The panel speaks:

##### Brian Human

- Don't Panic! – this is not the end of planning as we know it – NPPF presents more of a solution than a problem
- Note that the document does not just apply to the heritage sector.
- Points:
- Does not define sustainable development
- Needs balance and less bias towards economic on the social/environmental/economic
- Planning policy – needs a sensitive transition period for Local Authorities to get plans up to date in order to comply to guidance
- Town Centre First agenda - weakens importance to town centre development versus edge of town development
- Tourism not mentioned in context of town centres only of rural towns.
- Emerging sustainable transport should be promoted
- Quality of towns (where people live) in perspective with historic properties
- There is no longer a presumption in favour of the historic environment e.g. local listings and Grade II buildings
- Stress importance for detailed guidance - who should do this – the Government or at a local level
- Local Authorities – don't be scared – establish a role to prepare local plans to meet local needs

##### Dave Chetwyn

- Government give a negative view to planning, obstructing investment and house building
- Actually the planning system should create certainty, development opportunities and confidence
- The definition of 'sustainable development' where sustainable means social community environmental dimension to development
- There are tensions where the economic element pulls against the socio and environmental and growth pulls against local empowerment. However these don't need to be incompatible as suggested in the National Trust response where social and environment are important as means to achieve economic goals.
- Less detail over simplifies and creates more ambiguity
- Quality assurance – developers are interested in the environment and the community
- There is an assumption of high growth
- A gap develops where regional growth funding has been reduced along with the lack of skills

### **Malcolm Hockaday**

- Planning has become increasingly complex. For the public to engage complexity needs to be reduced
- The Government is looking to re-balance in favour of the economy.
- In responding to the NPPF we should look at the whole document as all sections interrelate to the historic environment
- Getting the balance right
- Sustainability – the definition will be tested through the courts
- P178 – ‘harm should be assessed against public benefit’ - there is no definition of ‘public benefit’
- Also moderate and minor harm are not looked at
- Also viability for re-use – there is no help for this
- Suggests we look at ‘Campaign Against Sprawl’ response which goes through the NPPF line by line and has indeed written a new version of it

### **Caroline Kay**

- All (both organisations and individuals) should make a detailed response to the NPPF consultation and that those working in Local Authorities should respond to the impact assessment.
  - What is good about the NPPF:
    - It attempts to clarify and simplify
    - The historic environment and green belt have special protection
  - What is wrong about NPPF:
    - Presumption of ‘yes’ - how can a plan be clear enough not to be deemed indeterminate?
    - Loss of national policies and its detail
    - Problems with transition
    - Brevity does not mean clarity
    - No practitioners’ guide
    - Dubious assumptions in the impact assessment
    - Brownfield – should be an incentive to develop Brownfield before Greenfield
    - BPT response will highlight impact on Bath World Heritage Site
-

## **The discussion groups feedback:**

### **Group 1 – led by Brian Human**

- Sustainability – need to show how process works
- Useful definitions from PPSs (esp PPS1) definitions absent in NPPF
- Does not simplify – there will be more legal challenges - ‘the lawyers will be the winners’
- Roadmap needed showing how NPPF links to other policies/directives – and make this for both professional and general public use
- Other problems identified:
- Transition
- It lacks mention of energy and sustainable transport
- Design codes – should make guidance documents available to clarify
- Urban design not weighted enough

### **Group 2 – led by Dave Chetwyn**

- Sustainable development – the presumption of sustainable development depends on the definition of sustainable – that there should be more detailed consideration of future generations.
- Definition can become more top down
- No provision for home workers
- Transport not accounted for – consider the cost of travel versus environmental impact
- How will power (in decision making) between settlements be addressed?
- Lack of clarity
- Local plans become more important
- There will be more legal challenges
- To have consistent guidance is good
- But complexities will creep in with time
- Questions over neighbourhood plans (and the definition of a neighbourhood)

### **Group 3 – led by Malcolm Hockaday**

- Concern that definition is too woolly
- Balance of economic – environmental – social wellbeing
- Level of detail is lacking and it needs a different format
- NPPF should link more to other documents and show what weight given to supplementary guidance
- Does provide better use of language and more transparency, but still needs to be refined

### **Group 4 – led by Caroline Kay**

- On the definition of sustainable development the group ranged from there being a legislative definition to asking whether it was possible to define
- So – Presumption of yes is the problem
- NPPF will simplify but at the same time exacerbate conflict
- Transitional period will be difficult with legal challenges

- Local Authorities may not be able to (afford to) defend appeals.
- A graphic representation would make it digestible to the public

Also concerns over:

- Design review process
  - Strategy for enjoyment of the historic environment
- 

**Other points:**

- Send a covering letter with response
- The number of responses received should make some impact – another reason to respond.
- James Caird who is involved in the IHBC response will be recommending to the IHBC to endorse English Heritage's changes to the wording.
- Malcolm Hockaday urged people to continue to 'make a noise' after the 17 October deadline.