

National Planning Policy Framework Consultation

Response from the Historic Towns Forum

1.1 The Historic Towns Forum (HTF)¹ welcomes the opportunity to comment on the proposed National Planning Policy Framework (NPPF), which will become a vital part of the new planning system. Preparation of the NPPF provides an opportunity to rationalise existing policy and guidance, to bring it up to date and to remove inconsistencies.

1.2 The HTF response considers both principles and content.

Principles

1.3 There are several principles that should guide the overall approach to the NPPF.

- a. Its form and content must recognise that it is an integral part of the whole planning framework that embraces the National Planning Policy Framework, Local Development Frameworks and Neighbourhood Plans. NPPF policies are strategic at the highest level.
- b. The content should address only those matters that need to be the subject of national policy in that they address issues:
 - i. of agreed national priority; and
 - ii. where, in the interests of good planning, there needs to be consistency across the country.
- c. It must be based on clear national objectives and intended outcomes.
- d. There must be consistency across issues so that the NPPF represents a coherent package of policies, i.e. policies relating to aspects of planning activity must be consistent with each other and mutually reinforcing rather than exclusive.
- e. The policies within the NPPF should be designed to endure for a minimum of five years under normal circumstances and should in key respects be robust for the 10-15 year time horizon anticipated in Local Development Frameworks.
- f. The *policies* should avoid unnecessary detail. They may be supported by subsequent *advice* and *guidance* to assist local planning authorities' discretion in local implementation. The NPPF should not include *instructions* on how to deliver policy.

¹ The Historic Towns Forum promotes prosperity and heritage in historic towns and cities. It represents the interests of local authorities, but its membership also includes corporate and amenity organisations involved in heritage. Key aspects of its work are: promoting best practice; and taking a holistic, joined-up, approach to historic places.

Content

- 1.4 The NPPF should cover seven broad types of policy.
- a. The purposes, objectives and core principles of planning and the aim of promoting sustainable development.
 - b. The purposes of and procedures for preparing Local Development Frameworks and Neighbourhood Plans; the relationship between them; and the relationship of both to the NPPF.
 - c. The core purposes of and procedures for Development Management, including, for example, S106 agreements and the application of the Community Infrastructure Levy (CIL).
 - d. Crosscutting contextual policies, e.g. design and place making.
 - e. Policies covering key activities and topics, e.g. housing, conservation, telecommunications and transport.
 - f. Policies addressing environmental concerns, e.g. noise, flood risk.
 - g. Policies guiding the use of planning tools, e.g. Green Belts, advertisement control.
- 1.5 If the objective of simplifying national policy through the NPPF is to be achieved some policy areas and some details in the current policy documents will be removed. In the view of the HTF it is important that NPPF contains policies that will promote:
- a. sustainable development that balances the environmental, community and economic, aspirations;
 - b. positive place making through a commitment to:
 - i. conservation and best use of existing built and natural environments;
 - ii. protecting and reinforcing local distinctiveness;
 - iii. high standards of design and development; and
 - c. the prosperity that will underpin these aspirations.
- 1.6 This can be achieved by bringing forward key aspects of updated policy from existing documents, consistent with the principles above. The HTF attaches the highest priority to the following:
- a. sustainable development and climate change (PPS1 and Supplement);
 - b. local spatial planning (PPS12);
 - c. planning for viable and vital town centres (PPS4);
 - d. planning for the historic environment (PPS5);
 - e. planning for sustainable transport (PPG13); and
 - f. the use of S106 agreements and CIL (Circular 05/2005 and subsequent documents).
- 1.7 The NPPF must make clear the strategic importance of protecting of the historic environment and uphold the policies established in the recently revised and concise policy document PPS5. The strategic importance derives from its cultural value, contribution to national and local identity, environmental quality, sustainable use of embodied energy, and importance to the tourism industry.

Conclusions

1.8 Our heritage is an essential component of a place's infrastructure – physical and cultural - and we have a duty to the future not to use it up or destroy it. This aspect of sustainability has to run through all planning policy.

1.9 The Historic Towns Forum is concerned that there is little clarity in the consultation of the Government's intended scope of the NPPF. It could be a short compendium of selected policies from current PPSs and remaining PPGs, Circulars, Regulations and other policy documents, or could be much more. A 20 page document would be very different from one of 150 pages. This lack of clarity makes a definitive response difficult. The Forum nevertheless urges the Government to:

- a. recognise the value of the PPS 5 process, and commend this as a model for abbreviating other national planning policies, and for seeking no further abbreviation;
- b. recognise the value to local planning, whether by local authorities or local communities, of consistent approach to common issues and the certainty that this provides – the basis of our development management system;
- c. revise the Localism Bill in the light of the separate representations by the Forum to provide a clear framework within which to draft the NPPF; and
- d. commit to a wide ranging and in depth consultation on the draft NPPF.

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February 2011