

**The Heritage Alliance
Operation of the National Planning Policy
Framework
Communities and Local Government
Committee**



7th May 2014

The Heritage Alliance is the largest coalition of non-government heritage interests in England. It brings together over 90 major and predominately national bodies from specialist advisers, practitioners and managers, volunteers and owners, to national funding bodies and organisations leading regeneration and access initiatives. They are supported in turn by thousands of local groups making up over six million, members, Friends, Trustees, volunteers and staff.

As the representative body, we convened a special meeting of our Spatial Planning Advocacy Group to draw up our response. While many of our members will be responding from their own specialist perspective to this Inquiry, our response identifies the consensus – supporting the strong agreement through the independent heritage movement that while the NPPF operation in the first two years should be welcomed, there are still major issues in implementation which could have an adverse effect on the historic environment and broader government objectives.

The Heritage Alliance Response:

The Heritage Alliance welcomes this Inquiry on the operation of the National Planning Policy Framework [NPPF] in its first two years by the Communities and Local Government Committee.

The Alliance has long supported the Government's campaign to streamline the planning system, while conserving our heritage in order to maximise its economic, environmental and social returns. The Alliance welcomed the finalised version of the NPPF which has provided a working framework for conserving and enhancing the historic environment (section 126-141), alongside recognising the appropriate conservation of heritage assets in line with their significance as one of the 'Core Planning Principles'. The Alliance also welcomes the recently published 'alpha' version of the Planning Practice Guidance [PPG], which it feels will add the necessary clarity to the implementation of the NPPF in relation to planning decisions and the historic environment at the local authority level. The Alliance also welcomes the decision from the Department for Communities and Local Government [DCLG] to agree to retain the existing PPS 5 Practice Guide until the English Heritage good practice advice has been consulted on, revised and then published later in 2014. However, while recent case studies have demonstrated how the NPPF is slowly helping to achieve a more equal weighting for the historic environment in planning applications (All Saints Church, Somborne Park [APP/G0908/A/13/2191503], StockBridge [APP/C1760/A/13/2190892], and Lydden New Bield), The Alliance remains deeply concerned that a divergence exists between the framework outlined in the NPPF and its implementation at the local authority level. While the Alliance is not able to comment specifically on individual planning decisions, its response considers the impact of the

NPPF in its first two years in relation to the historic environment, which it stresses has broad implications on planning constraints, the planning for housing and town centres.

The Alliance continues to fully recognise and support the need for sustainable development objectives outlined in the NPPF (Para. 6-10), affirming that a balanced approach to sustainable development objectives can be consistent with the protection of the historic environment. The Alliance remains concerned, however, that the considerable weight applied to the economic component of sustainable development in the NPPF will continue to lead to the development of mediocre quality in implementation, with an adverse effect on our heritage and the wider environment. The Alliance therefore wishes to reiterate that the planning system has a vital function in protecting and enhancing the environment – both historical and natural – for future generations. We therefore ask the Inquiry to consider recommending rephrasing the NPPF (para. 14), so that developers should demonstrate the social and environmental sustainability of planning as well as purely economic objectives.

The Alliance also remains concerned with the distinction between ‘harm’ and ‘significant harm’ in the NPPF and its implementation in planning decisions. While the PPG has been useful in helping to clarify what is meant as significant harm, The Alliance feels that this has not been implemented and confusion remains over what that actually means.

The Alliance also remains concerned that without adequate historic environment professionals at the local authority level to implement the NPPF, government objectives (such as planning for housing supply) will not be met. Recent research (2013) undertaken by the Institute of Historic Building Conservation [Alliance member], the Association of Local Government Archaeological Officers and English Heritage, has shown a 28% fall in the number of HER officers and conservation officers giving advice at the Local Authority level since 2006 – and this downward trend is expected to continue. While the NPPF states that local planning authorities should consult the historic environment records and appropriate expertise (para. 128) in determining applications, this continued drastic decline in specialists giving professional advice, reduction and closure of some historic environment advisory services, could alarmingly have catastrophic consequences for economic growth, the supply of housing, and the overall protection of the historic environment.

It remains clear that professional planning advice and a well-maintained Historic Environment Record at the Local Authority level are critical for the implementation of the NPPF, local economic growth and overall sustainable development objectives. Advice from historic environment professionals allows commercial firms to meet statutory requirements more promptly, to help avoid wasted applications, unmanaged risk (and compensation liabilities), and prevent unplanned costs and delays to housing development. Furthermore, the Alliance is concerned that already considerable risks to the historic environment could become further accentuated as the UK economy recovers and the construction sector expands, as planning applications will increase alongside the demand for advice. Continued recovery could be delayed or bottlenecked due to limited capacity from over-stretched and under-staffed officers providing limited and inadequate advice. The Alliance therefore recommends that the CLG Select Committee address this downward trend in the implementation of the NPPF, and also take note of evidence from John Howell MP and Lord Redesdale’s recent Local Archaeological Services Inquiry.

Furthermore, while the NPPF references that Local Authorities should target the development of brownfield sites over greenfield (para.79-92), the Heritage Alliance shares the concern with its member, The Campaign to Protect Rural England, that

undue strain is placed on Local Authorities to develop greenfield instead of brownfield sites. As a recent CPRE research report (2014) has identified, only a minority (27%) of local authorities outside London are setting targets for the re-use of brownfield land in their area. The Alliance recommends that the Inquiry should look at the clear divergence between planning guidance and its implementation in the context of the allocation of brownfield before greenfield for development.

As a long-standing member of the Historic Environment Forum working on the development of Planning Guidance and subsidiary Good Practice Advice, the Alliance will continue working closely with CLG and other relevant bodies to ensure that this very significant change in planning policy is implemented effectively in a way that continues to support these two key aspirations in the NPPF.

‘The purpose of the planning system is to contribute to the achievement of sustainable development.’ *Ministerial foreword to NPPF*

‘Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.’ *Ministerial foreword to NPPF*

We look forward to the Select Committee’s findings.

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