



National Planning Policy Framework

Key issues

September 2011

The new National Planning Policy Framework (NPPF) has a central role to play at the heart of the planning decisions which affect the future quality of our cities, towns and villages. As the new national charity for the civic movement working with a network of hundreds of community-based and volunteer-led civic societies across England, Civic Voice is excited by the prospect of reforming the planning system to help people shape their surroundings more effectively. We work to make the places where everyone lives more attractive, enjoyable and distinctive and to promote civic pride. We know how important effective planning is to these goals. Given this role it is no surprise that civic volunteers are the most numerous participants in the planning system and these views are informed by their practical experience and local outlook.

The role of planning

Civic Voice believes the planning system has untapped potential to engage people in becoming more actively involved in their community as well as managing land use change and development for the widest public good. It combines vision with necessary regulation and plays a critical role in protecting and improving the quality of local places.

The review of national planning policies is key to achieving this potential for planning, alongside the Localism Bill. We share the ambition for a more localist and user friendly approach which only addresses those issues which need to be included. We welcome having all of national planning policy in one place. A clear and effective national planning policy framework is fundamental to the overall effectiveness of spatial planning, providing certainty for both developers and communities and delivering quality development. It needs to both establish a favourable policy direction and be written in accessible language. It also needs to provide a clear foundation for preparing development plans which properly reflect community views. It should be underpinned by a planning system with the resources, particularly at a local authority level, commensurate with the important role it plays.

These are the expectations against which we have judged the draft NPPF.

Key issues

There is much to be welcomed in the detail of the draft NPPF. It emphasises the importance of design, introduces neighbourhood plans, values green space, recognises town centres, avoids unhelpful targets and protects national designations. This welcome detail is set to be overwhelmed, however, by the new bias of “pro growth” planning and the risks to everyday England. We encourage an alternative and more planned approach which will deliver “smart growth” that drives economic recovery alongside social, cultural and environmental progress.

Everyday England - Our primary concern is for “everyday England” – the local neighbourhoods, streets, buildings, green spaces, town centres and views of daily life for

the vast majority of people. It is our everyday surroundings that are most at risk from a draft NPPF that is (helpfully) strong in its advocacy of the importance of places designated for the benefit of their wildlife, heritage and natural beauty and of the Green Belt but not for the undesignated, everyday places on our doorsteps.

Local voices – The Government has promised a welcome “*power shift*” to put “*communities in control*” and to ensure their views make a difference. This is especially important in everyday England. Yet, current guidance that the views of local communities about what matters in their historic environment should be heard in developing the evidence base for planning is set to be lost and support for local listing of buildings and structures to be dropped – denying a voice to the very people who know their area best. The draft NPPF is also weak in valuing the community view at the very earliest stages of preparing plans and drawing up development proposals.

Fair planning – Planning will never be easy. There is too much at stake. Public trust in its decisions depends on a fair process and unbiased decisions. The draft NPPF sweeps this away. The default answer to development is to be “yes” and councils should give permission “*wherever possible*”. Even the policies in local and neighbourhood plans are to be drawn up to do “*everything it can to support sustainable economic growth*”. The result is a double presumption in favour of development – with “*pro growth*” policies locked in through a plan-led system. Where there isn’t a plan or there are no relevant policies there is a free-for-all and local authorities are told simply to “*grant permission*”. This isn’t fair and local communities will increasingly challenge the results and lose faith in the system. Instead, plans and planning decisions should be founded on a truly integrated understanding of sustainable development which recognises environmental limits and social justice.

A clear geography – The draft NPPF is virtually place-less. It says nothing about the character of England; its towns, cities or countryside. It also lacks a strong geographical rationale setting out the preferred locations for development. This would focus development where it can regenerate towns and cities, avoid sprawl, boost town centres for their economic & social role, and reduce the need to travel & use the car. There is welcome support for town centres but it removes the “brownfield first” approach to housing, adopts a “more not less” approach to plan making and allocating land for building, loosens the “*town centre first*” policy for new offices; and requires retail and leisure uses to be in town centres only “*where practical*” not for this to be “*required wherever possible*”. We fear the sprawling nature of new building that will result will add deadweight costs to the economy as the costs to the public and private sector and to communities from additional infrastructure and increased travel costs mount up.

Smart growth – Planning is a means for informed discussion about the kind of society we want to live in and the places we want to inhabit. It is essential to our happiness and well being as well as our economic future. Effective planning supports smart growth – securing economic recovery alongside social, cultural and environmental progress. It produces quality development in the best locations and stands the test of time. Our economic future lies in high quality, well designed towns and cities which respect their history in developing their future. This requires strong planning. Yet, the draft NPPF implies planning is an obstacle to economic growth and glibly redefines 25 years of international debate over sustainable development to place a premium on economic growth. The facts don’t support the arguments. Over 80% of planning applications are granted permission, over 30% of appeals are won, less than 1% of planning applications take more than a year to decide and there is much more land with permission for building than there is demand. We need more planning not less and to invest in a system which can guide smart growth that supports social, cultural, economic and environmental progress in the round.