The NPPF's full impact is not being grasped

Articles and letters in your 6 April issue suggest that some may not have grasped the extent of change that I believe the National Planning Policy Framework (NPPF) intends to achieve.

In the absence of an up-to-date local plan that conforms with the NPPF, the focus should be on the test in paragraph 14: planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

It is not appropriate, therefore, to select one element of the NPPF, for example in relation to design, as a sufficient basis for refusing planning permission. Instead, it must be clear that the impacts outweigh all of the benefits, to which significant weight must be attached.

Similarly, it is surprising to see planning authorities asserting that the NPPF may make no difference to their local plan. The NPPF is clear that plans will not be found sound unless they are fully informed by the presumption in favour of sustainable development.

This means starting from the proposition that the full, objectively assessed needs for things such as retail, housing and employment development are met unless it can be demonstrated that the harm of doing so significantly outweighs the benefits.

The NPPF retains a plan-led system, but planning authorities should only be able to secure the statutory force of an up-to-date local plan if their plans are positively prepared, making "every effort" to meet their area's objectively identified development needs. How many plans in the South East have genuinely been prepared on that basis?

John Rhodes, director, Quod

Local bus: integrated public transport is more common in other developed nations

Trade-offs must be made to cut carbon emissions

I welcome Roger Adams' response (*Planning*, 9 March, p16) to my letter (24 February, p16) as it reflects the hyperbole and misdirection generated by the anti-wind farm lobby.

I agree that consideration of landscape impacts is necessary, but to imply that the remainder of the countryside outside national parks and areas of outstanding natural beauty should benefit from similar protection to these designated areas is simply untenable. It opens up a whole different argument about whether we perceive our rural areas as functional spaces or as pretty play areas for the cash- and time-wealthy.

If landscape impacts continue to be used as grounds to reject applications, we are going to miss our 2020 carbon targets. Whatever technology we utilise to generate our energy will impact on the landscape to some extent.

I don't believe there is any zealotry in the approach I advocate. If we wish to continue living the lives that we do while reducing our emissions, some trade-offs have to be made.

Alastair Smith, development and planning manager, Wind Prospect Developments

GET IN TOUCH

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Regulation is crucial for transport connectivity

Sir Peter Hall asks why we cannot have an integrated public transport system in Britain so that "the bits fit together" as they do in Switzerland and the

// Checklist will help councils identify if their local plans conform to the NPPF // Initial assessment could take just one day //

Framework support toolkit t

By Susanna Millar

A new checklist to help councils see how well their local plans conform with the government's National Planning Policy Framework (NPPF) was due to be published as *Planning* went to press this week.

The self-assessment tool has been created by local government advisers the Planning Advisory Service (PAS) and Local Government Association to help councils understand how they may need to update their plans to bring them in line with the NPPF to ensure a robust base for local decision-making.

Councils with local plans adopted since 2004 are being given 12 months to get their policies in line with the NPPF.

The tool will be published in two parts. The first, which was written with councils that have adopted core strategies in mind, will give a rundown of all the new requirements of the NPPF with which local plans will need to comply.

The second part, which is being finalised and is expected to be published within weeks of the first, aims to give a more comprehensive overview of the NPPF and will focus on helping councils gauge the degree of risk in assessing their local policies against the framework.

The checklist has been developed in consultation with plan examination body the Planning Inspectorate (PINS) and PAS says it has already tested a draft version with five local authorities: Bristol City, Elmbridge Borough, Mid Devon District, Oadby and Wigston Borough and Waveney District Councils.

Housing: a new planning self-assessment tool will help councils identify if their local plans meet NPPF rules on new homes

PAS programme manager Alice Lester, who has led on the project, said there will be questions for the inspectorate to thrash out in terms of the interpretation of the NPPF.

However, she said the tool will "help councils think about the level of risk in their policies for planning applications coming forward".

She said: "It's about helping to identify the gaps and then thinking: 'What do we do about it'. We hope it will be useful for local authorities in understanding where they are in relation to adopted and emerging policies and in getting to grips with what type of work they need to do."

Lester added that the tool should be relatively quick to use depending on how well a council knows its own

Councils may face local plan struggles, accordin

By Susanna Millar

Local planning authorities have not sufficiently understood the extent of change the government's National Planning Policy Framework (NPPF) intends to achieve, one of the key advisers on the draft policy has said.

In a letter to *Planning* this week (see p16), John Rhodes, director of planning consultancy Quod and one of the four practitioners who advised the government on the draft NPPF, says that the final framework makes it clear that local plans will not be found sound at examination unless they are "fully informed" by the presumption in favour of sustainable development.

Under the framework, the presumption will apply where a local plan is absent, silent or its relevant policies are out of date – unless the adverse impacts of applying the presumption significantly and demonstrably outweigh the benefits.

Rhodes said this means starting from the proposition that the full, objectively assessed needs for housing, employment development, retailing and other aspects are met. He had previously argued that there

orities have already tested draft checklist

ɔe launched

VHAT THE TOOLKIT ASKS

he presumption in favour of ustainable development

- Does the plan positively seek opportunities to meet the development needs of the area?
- Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change?

lousing

- What is your record of housing delivery?
- Have you identified
  a) five years or more supply of specific deliverable sites
  b) an additional buffer of 5 per cent (moved forward from later in the plan period), or
  c) if there has been a record of persistent underdelivery, have you identified a buffer of 20 per cent (moved forward from later in the plan period)?
- Does this element of housing supply include windfall sites; if so, to what extent is there "compelling evidence" to justify their inclusion?

)URCE: PLANNING ADVISORY SERVICE

ɔlan, estimating that it could be just . day's work to complete the initial hecklist.

The government has said that ocal authorities have the option of arrying out a partial review of their ocal plans or may need to revise heir whole plan to take account of the policies in the NPPF, which was launched last month.

A spokesman for the Planning Officers Society said the self-assessment tool would help local authorities pinpoint where they may need to update plans.

But he said that there may actually be less for councils to do to make their plans compliant with the NPPF as the final version has reversed some changes mooted in the draft. "On town centre policy, for example, we are back to the status quo before the NPPF came out," he said.

The spokesman added that some authorities may decide not to spend time and money on a re-examination of their core strategy and accept that the NPPF will be taken into account as a material consideration in planning decisions as was the case when previous planning policy statements were issued.

42%

Proportion of England that is covered by an adopted local plan now the NPPF has come into force

Local authorities can also seek advice from a special team set up within PINS, including a telephone helpline service, which aims to help councils in bringing their plans in line with the NPPF.

The self-assessment tool will be available on the PAS website, www.pas.gov.uk

ɔ framework adviser

hould not be a transitional period ɔr authorities to get their local plans n place as it would delay growth.

A spokesman for the Planning Officers Society said that the ɔresumption would require a shift in hinking for local authorities when hey prepare plans.

"Inspectors will be looking at plans to see whether they make adequate provision for growth and will make decisions in light of the presumption.

"But to a large extent we will only see how the NPPF will work in practice once we've got some decisions on cases," he said.

Rural homes: loss of planning policy guidance on occupancy controls regretted

Experts call for NPPF advice gap to be filled

By Bryan Johnston

Planning experts have urged the government to act quickly to clarify arrangements for back-up guidance to underpin its new national policy.

Brownfield sites in the green belt and farm dwellings are among policy areas where professionals see a need for technical advice to replace planning policy statements (PPSs) and planning policy guidance (PPG) scrapped by last month's introduction of the National Planning Policy Framework (NPPF).

Michael Gallimore, a partner at law firm Hogan Lovells, said abolition of PPG2 on green belts has left a question mark over the status of major developed sites (MDSs), such as redundant hospitals, in the green belt that councils have identified as suitable for redevelopment.

"We still have sites labelled as MDSs, but people are wondering about the significance of this designation now the guidance underpinning it has gone," he said. "The government should either say it is ditching the MDS policy or, more sensibly, publish new guidance."

Fenella Collins, head of planning at lobby group the Country Land and Business Association, voiced concern at the revocation of annex A of PPS7 on sustainable development in rural areas. The annex set out a way to establish whether rural workers' dwellings can be justified as an exception to rural restraint policies.

"We now have no detailed official guidance on how to assess proposals for new rural homes or for removal of agricultural occupancy conditions on existing dwellings," said Collins. Ministers should reinstate the annex via a circular, she said.

Martin Goodall, a consultant solicitor at Keystone Law, said useful advice has been lost with the scrapping of PPG14 on unstable land, PPS23 on planning and pollution control, PPG24 on noise and PPS5 on the historic environment. "This will leave a gaping hole that will cause considerable difficulty for councils, developers' advisers and inspectors," he said.

The Department for Communities and Local Government has said it will work with practitioners and interested parties to identify what further guidance is needed, including the possibility that some might be produced by professional bodies and others outside government.

But Goodall warned: "Encouraging other bodies to promote their own ideas won't help in the long run because it will carry no official weight and will lead to a plethora of material in different places."