

Submission in response to: Revised National Policy Framework consultation: 10th May 2018

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The Edge is a voluntary built-environment think tank and is multi-disciplinary in a landscape remarkable for the number of single-discipline institutions it contains. We stand for being:

- **Interdisciplinary:** bringing built environmental professionals together, inclusively along with others who share their concerns.
- **Open and creative:** working across all disciplines with competitors and collaborators.
- **Strategic in approach:** encouraging accessible and shared knowledge and seeking to connect place, practice, policy and research.
- **Visionary:** in identifying the issues and in promoting effective and urgent responses to both local and global challenges.
- **Professional:** developing a broad-based ethic of responsibility to social and environmental demands based on an equitable global framework.
- **Business-like:** furthering the skills and capacity of the UK construction industry to promote prosperity and deliver a better built environment.

Response:

We welcome this consultation. Our response has been informed by expertise in a range of disciplines, as appropriate for a wide-ranging policy document such as the NPPF.

Please note that some of our comments are points of principle and apply to a range of consultation questions. We have therefore presented them in this stand-alone way rather than against individual questions.

The Edge recommends that these principles are embedded in the NPPF and not in the revised NPPG, as they need to be policy not guidance.

Introduction

The Edge acknowledges that the government's primary objective in revising the NPPF is to encourage a rapid increase in the provision of dwellings in response to a well-recognized and urgent housing need. However the Edge cautions that this must be done in a way that supports place-making – with health and wellbeing, integrated sustainable transport systems and high environmental building performance levels to serve the present and the longer term future.

In order for the NPPF's policy guidelines to deliver effective, long term outcomes consideration needs to be given to a more integrated approach to built and natural environment legislation. For example Planning Policy Wales, now out for consultation, is guided by three central pieces of legislation: the Well-being of Future Generations, the Planning Act and the Environment Act.

General points to incorporate into various sections of the revised NPPF:

1. The draft revised NPPF places much emphasis on housing numbers. This should not be at the detriment of **quality and sustainability**. This is a general comment which applies to a number of areas where we have concerns that design quality and sustainability could be compromised, with detrimental long-term impacts; in addition, examples of specific issues include the lack of emphasis of daylight, with associated health and wellbeing benefits (Chapter 11 - §123), and the focus on avoiding detrimental noise, with only very limited attention to the broader quality of the acoustic environment (Chapter 15 - §178).
2. Plan-making, decision-making, implementation and monitoring will rely on **local authority resources**. These have been under significant strain, compounded by additional responsibilities such as those of health under the Health and Social Care Act 2012. We strongly recommend MHCLG to review the current situation and provide more adequate support to local authorities to ensure the NPPF is delivered, consistently and without undue delays in the planning process, and including the delivery of environmental and social benefits. We would stress the importance of **implementation and monitoring**, which should be given equal importance to plan-making and decision-making.
3. **Environmental net gains**: the requirements for environmental net gains and biodiversity net gains, which are two different objectives, are welcome and are best achieved on site, not through off-setting. However as the Natural Capital Committee advised the Government, it is important that a natural capital net gain principle is established within the spatial planning regime for housing and infrastructure and the NPPF should seek to make this a requirement.
4. The new draft revised NPPF fails to fully reflect the **25 Year Environment Plan (25 YEP)**. This is a significant shortcoming. The NPPF has cross-sector reach and is a significant means for delivering the objectives of the 25 YEP, as highlighted in the 25 YEP itself. The NPPF should also be a clear demonstration of the government's commitment to environmental objectives, with clear and consistent alignment across departments. We think therefore that several sections of the NPPF should be amended accordingly, including: setting the 25 YEP as a material consideration (Chapter 1), referring to it in strategic policies (Chapter 3 - §20), and aligning individual policy objectives with it (e.g. on green infrastructure and biodiversity within Chapters 14 and 15, among others).
5. While we welcome the intention of Chapter 8 to promote healthy and safe communities, we think there should be more emphasis on **health and wellbeing** and how the built and natural environment can significant contribute to improvements in this area; in particular, health **should** be included as part of the essential strategic considerations in plan-making (Chapter 3 - §20). More planning policy guidance should also be provided to Local Authorities on the potential health and wellbeing implications of proposals onto future occupants and neighbouring communities, and the need for coordinated, cross-disciplinary and long-term approaches.
6. The multiple environmental, health and place-making benefits of **green infrastructure** (including trees) should be better reflected throughout, and objectives should be better aligned with the 25 YEP, including Chapters 8, 14 and 15.

Specific Comments:

7. **Chapter 2:** In order to demonstrate consistency, commitment, and cross-departmental working, the definition of sustainable development should make reference to and be aligned with the **UN Sustainable Development Goals**, which the UK government is committed to deliver both in the UK and overseas.
8. **Chapter 3:** There appears to be a downgrade in **requirements for local plans**; we have concerns about this. Planning should retain the hierarchy from strategic issues through to local policies and, where available, neighbourhood plans. There could otherwise be a significant gap in issues such as design quality, place-making, and green infrastructure.
9. **Chapter 3:** We support the intention to require more **transparency in viability assessments**. This should also apply, in return, to transparency on the use of developer contributions by local authorities. Quality of place and long-term environmental quality of development should not be compromised by viability assessments, which is why robust and consistent planning requirements are essential to provide certainty and a level development playing field.
10. **Chapter 3 - §34:** Development contributions should include energy alongside other listed infrastructure needs
11. **Chapter 3 - §20f:** Policies for energy infrastructure should include renewable energy generation alongside the already included proposals for heat (to align with clause 150b about associated infrastructure).
12. **Chapter 14 – §95** of the current NPPF states ‘... actively support energy efficiency improvements to existing buildings...’. This seems to have been omitted in the new consultation draft. It should be reinstated. Energy efficiency improvements to the existing building stock are crucial to meet carbon targets, reduce fuel poverty, and generally align with the Clean Growth Strategy.
13. **Chapter 14 - §148:** We strongly recommend reverting to the current NPPF wording on the 2008 **Climate Change Act**, i.e. that policies should be “in line with objectives and provisions of the 2008 Climate Change Act”, not the current proposed revised wording that they should be set “within the context of” the Act.
14. **Chapter 14 - §149b:** We note the consultation comment that this clause may be amended in the future. We would support this and welcome future consultation on this. We believe that, within a framework that would avoid complexity and multiplicity of standards and approaches, improvements beyond national standards should be allowed if the planning authority can demonstrate this does not reduce the financial viability of local development. This can allow areas where there is local public support and local viability to act as pathfinders for gradually increasing standards and reducing implementation costs, prior to wider roll-out via the national technical minimum standards.

Glossary – A number of changes are recommended to the glossary

Biodiversity Net Gain

Biodiversity Net Gain is development that leaves biodiversity in a better state than before.

See: *Biodiversity Net Gain: Good Practice for Development*. CIRIA, CIEEM, IEMA (2016)

https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf

Environmental Net Gains

Ensure the definition is in concord with the 25 YEP statement: *"We want to expand the net gain approaches used for biodiversity to include wider natural capital benefits, such as flood protection, recreation and improved water and air quality. They will enable local planning authorities to target environmental enhancements that are needed most in their areas and give flexibility to developers in providing them."*

Note: For planning purposes 'environmental net gains' should also include improvements in air quality, noise control, green space and trees for active travel and health benefits.

Green infrastructure:

Omit: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Replace with agreed EU definition A strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation in both urban and rural areas. This network of green (land) and blue (water) spaces can reduce investment in engineered (grey) infrastructure, improve environmental conditions, citizens' health, create job opportunities and enhance biodiversity.

Natural Capital

Natural capital is a way of defining the wide range of benefits that we derive from nature. It provides the air we breathe and the water we drink. It is essential to life and it underpins thriving societies and prosperous economies.

<https://naturalcapitalcoalition.org/>

Reference the work of the Natural Capital Committee

<https://www.gov.uk/government/groups/natural-capital-committee>

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