

National Planning Policy Framework (NPPF)- Impact on the Historic Environment.

The NPPF is the government's proposed policy in relation to planning. The document reduces about 1000 pages of policy to 100. This would therefore replace the existing national policies in relation to the historic environment (Planning Policy Statement 5(PPS5)). As a result the heritage guidance would be reduced to 3 pages from the current 14 pages of guidance in the existing PPS 5. The guidance should be read in conjunction with the Planning (Listed Buildings and Conservation Areas) Act 1990 which remains unaltered.

This does not mean that all the items contained in the existing guidance are removed but instead if a policy has been stated once it is not repeated. For example creating mixed uses is discussed in core planning principles and the integration of new buildings is discussed in the design section.

The major change is a result in emphasis as currently policy areas which are common to all locations can be dealt with in national policy alone. Development plans should deal only with what is locally distinctive. The NPPF uses the basis that detailed policy will be contained within the development plans. So in effect the government will give broad principles and detailed policy will be decided at a local level. It is at present unclear exactly what will happen in relation to guidance documents in relation to these elements at national level e.g. English Heritage guidance on setting, enabling development etc. We would assume they would remain in place but this has yet to be clarified or how if they are retained these link into the proposed new framework.

Changes within Document.

Clearly there is a substantial slimming down of what is stated within the document. However it would appear to keep all of the important elements in the existing PPS 5 as the principles have not changed. This would appear on initial viewing to result in very little if any impact on the protection of heritage assets or the wider historic environment.

However is not clear though how this would work in practice as PPS5 had a guidance document which expanded upon how to interpret it at 55 pages in length. English Heritage believe that they will write a new guidance document but this has not been confirmed. This could therefore potentially lead to unintended consequences as there could be a much more varied interpretation of what is meant than at present. In theory this could be addressed within the new local development framework (LDF) with additional guidance documents and so the detailed guidance would be agreed locally as part of the localism agenda. An issue in relation to this is that currently the LDF cannot repeat what is in other documents e.g. PPS 5 so there could be a gap in policy between the two during any change over period.

Another issue is the removal of targets for development on brownfield land. This could result in gap sites not being redeveloped due to the higher cost of this than developing on greenfield sites. Coupled with the lack of a town centre first condition on new development it could be detrimental as gap sites within conservation areas within the centre of the city may not be redeveloped.

An issue which is not dealt with is that of climate change alterations to the historic environment however it could be said to be implied in that it would be covered under the paragraph on proposals “consider weight should be given to its conservation”. Sustainable development within the document refers to the economy not low carbon/ carbon neutral development.

Another proposed change is that the NPPF states that councils should have a strategy for the “conservation and enjoyment of the historic environment including heritage assets most at risk”. It would be assumed that the first part could be addressed through a general policy but it is unclear if for the assets at risk we would address the general issues as at present or if this is to be a more in depth document addressing specific issues facing assets at risks.

Conclusion

It would appear that in theory there would be little change in the protection of the historic environment in this document. However until it is used in practice and tested at appeal in particular where there would be a conflict between heritage assets and the economic benefit there would be concerns that the protection would not be as robust as at present due to the presumption in favour of development.

This is the Derby City Council Conservation Officer’s interpretation of the impact of the new guidance in relation to the historic environment and not the Development Control or wider City Council view. It has examined a number of relevant reviews and sources from the historic environment sector including Institute of Historic Building Conservation, Historic Towns Forum and other conservation officers views.