

21st September 2011

Rt Hon Greg Clark, MP
Minister of State, Decentralisation and Cities
Department for Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU

Dear Minister of State

The Draft National Planning Policy Framework

We, the undersigned, acknowledge and share the concerns expressed recently by the past Presidents of the RTPI, and by representatives of other eminent bodies, about the increasingly polarised debate over the Government's proposals for planning reform in England.

We are supportive of a review of the planning regime and we recognise a number of the motivators behind the production of the draft National Planning Policy Framework (NPPF). We were, however, concerned that business and economic policies are given clear precedence the environment throughout the proposals.

The proposals, as they presently stand, are draconian in the extreme. They tear apart a plethora of detailed and well considered planning guidance that has evolved and developed over many years. Guidance which considers many of the strategic threats society faces today, not least of which is climate change and its impacts on our villages, towns, cities and natural capital.

The Government's stated presumption in favour of sustainable development in the draft proposals requires forensic examination. As currently drafted it constitutes a gross mis-representation of the term 'sustainable development' - a principle which requires balanced consideration of economic, social and environmental factors. The Government's presumption is weighed heavily in favour of economic development, presented in a way which implies high environmental priority. In reality does the reverse.

The importance of the planning system to the long-term wealth of this country cannot be over-emphasised. The current planning guidance considers in detail factors with complex interactions and which are about much more than the strength of local economies. Proposals to simplify checks and balances (which exist

for sound and carefully thought-out reasons) carry with them real risks of creating a landscape dominated by vested interests at the expense of the majority of citizens. Once damage is done it will be harder and more costly to repair.

We believe that a review of the planning regime must exercise due caution and must:

- (a) Be undertaken with due diligence and be supported by thorough and open public debate and consultation;
- (b) Be genuinely rooted in sustainable development, with an emphasis on creating healthy, inclusive, high quality communities and environments;
- (c) Include a strong strategic process which also takes clear note of difficult national and global factors (e.g. preservation of the environment and climate change) which will impact on local communities in the medium and long term. (Doing so will create high quality local environments in which business will wish to invest as well as helping to deliver investor certainty for such businesses);
- (d) Not be developed primarily as a tool to rejuvenate the economy, at the expense of other longer-term interests and challenges;
- (e) Recognise that land use planning is arguably the most powerful tool in shaping communities and the mental and physical well-being of the nation. Planning should be resourced appropriately in terms of skilled practitioners able to follow, understand and communicate complex guidance to those wishing to develop.
- (f) Preserve planning's independent non-partisan status with robust checks and balances in place.
- (g) Be comprehensive. The NPPF includes nothing on planning for waste management. Simplicity will undoubtedly be undermined if cross-references to annexes – dealing with specific strategic issues – are required to be added later on. Far better that the outcome is sufficiently well thought out and developed in the first instance.

We fear that the Government's proposals are a capitulation to a powerful commercial lobby group and will result in a builders' charter to develop at the cost of wider local and environmental interests. We urge the Government to reconsider the draft NPPF, and to undertake a more reasoned and more inclusive review of the planning regime. Planning for infrastructure, fit for the 21st century, must incorporate good environmental stewardship and future-proof communities against the worst implications of climate change.

Yours faithfully,

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