

National Planning Policy Framework and National Model Design Code: Consultation proposals

Response submitted online 24th March 2021

(Closing date 27 March 2021)

Introduction

(This page has no questions)

Summary of proposed amendments to the National Planning Policy Framework

(This page has no questions)

Proposed changes to Chapter 2: Achieving sustainable development

(No comments to make)

Proposed changes to Chapter 3: Plan-making

(No comments to make)

Proposed changes to Chapter 4: Decision making

(No comments to make)

Proposed changes to Chapter 5: Delivering a wide choice of high quality homes

65: There is a risk that major sites will be split into smaller sites and come forward in a piecemeal manner to avoid the minimum 10% affordable homes requirement, unless policy specifically removes the ability to take this approach. In addition, where a need exists, there should be a requirement to provide social rented housing as well as other types of affordable housing (which are often not genuinely affordable, even at discounted market prices).

73: “A genuine choice of transport modes” is vague and should be better defined to ensure inclusion of sustainable, convenient and accessible public transport options.

Chapters 6 & 7

(There are no proposed amendments)

Proposed changes to Chapter 8: Promoting healthy and safe communities

(No comments to make)

Proposed changes to Chapter 9: Promoting sustainable transport

(No comments to make)

Proposed changes to Chapter 11: Making effective use of land

(No comments to make)

Proposed changes to Chapter 12: Achieving well-designed places

125-128: “Beauty” is subjective and pre-established principles of beauty are likely to ultimately lead to standardisation and a loss of distinctiveness, innovation and unique development. Other than in highly sensitive areas (such as Conservation Areas, listed building settings and other protected areas), in the Council’s experience, the particular aesthetics of a building are not usually what drives opposition to development. It is more likely to be infrastructure burden and effects on residential amenity.

126/127: To help truly reflect local character and design preferences, Parish Councils should have the opportunity to present their preferences in the design guides and codes.

130: The requirement for all new streets to be tree lined (unless clear reasons why inappropriate) is welcomed in principle, subject to appropriate consideration for public safety, including equestrians, for whom unobstructed verges are critical for safety. The Council would like to see a similar requirement put in place for hedges, where appropriate, to help reduce the impact of air pollution.

133: Outstanding or innovative designs should respect heritage and character in addition to simply fitting in with the overall form and layout of their surroundings. This is of particular importance in sensitive areas such as Conservation Areas.

Proposed changes to Chapter 13: Protecting the Green Belt

(No comments to make)

Proposed changes to Chapter 14: Meeting the challenge of climate change, flooding and coastal change

160: Proposals must take into account local knowledge regarding flooding and flood plain behaviour. Desk-based assessments can be flawed and incomplete, and too often do not reflect the true position and experience of those living in or close to flood-prone areas.

Proposed changes to Chapter 15: Conserving and enhancing the natural environment

176: The Council would like to see similar protection and recognition extended to National Nature Reserves and Sites of Special Scientific Interest as that afforded to National Parks and Areas of Outstanding Natural Beauty.

Proposed changes to Chapter 16: Conserving and enhancing the historic environment

(No comments to make)

Proposed changes to Chapter 17: Facilitating the sustainable use of minerals

(No comments to make)

Proposed changes to Annex 1: Implementation

(This page has no questions)

Proposed changes to Annex 2: Glossary

(No comments to make)

National Model Design Code

The Model Design Code is silent on the role of Town and Parish Councils. With the focus being on local design, Town and Parish Councils are uniquely placed to understand, represent and be able to reflect what their respective communities want. Parish Councils should have the opportunity to set out their preferences within the local design guides and codes plan, and this opportunity should be presented in the national model.

There appears to be little scope for flexibility and exceptions. In the Parish Council's experience, there will always be plots, sites and areas which require case by case consideration rather than fitting into specific zones and land use types.

For there to be public confidence in the engagement process, community involvement must be extensive, open and transparent, with the public represented at all stages including during the processing of evidence and data.

It is unclear whether the introduction of design codes and guides is intended to change the current participative rights for the public. There should be no reduction or removal of public participation and public rights in the planning system due to the introduction of design guides and codes.

The Model Design Code is silent on the role of enforcement and appeals. These functions are key elements of the planning system, and their role in this framework should be covered.

Public Sector Equality Duty

The potential for undermining the delivery of social rented housing may disproportionately impact some protected groups who are more likely to require access to this type of housing.

The move towards more digitised delivery of Local Plans and other elements of the planning process is likely to exclude members of the public who are less able to access information electronically, who choose not to, or who cannot afford to.

Potential reductions or removals of public participation in the planning system may disproportionately affect people from disadvantaged groups.

As with any part of the emerging comprehensive review of the planning system, the potential impacts on people with protected characteristics could be significant. The Council would expect to see the government undertake and publish its own impact assessment in this regard, and make this available for comment.