

Revised National Planning Policy Framework published

Summary:

The [Government published its significant revision to the English National Planning Policy Framework \(NPPF\)](#) on 24 July 2018. This briefing reviews the outcomes of the revision process, including feeding back on changes sought by CIfA to the draft revised NPPF, published in March. We cited several major concerns with this draft. They included provisions directly and indirectly affecting heritage being weakened or relegated to footnotes, glossary, or National Planning Practice Guidance (NPPG), a weaker definition of HERs, and wider changes to the visibility and centrality of both the historic environment and the central presumption in favour of sustainable development.

This statement focuses on the changes CIfA sought and the outcomes that are reflected in the final document. [For analysis of the detailed changes, see the briefing released by Historic England.](#) Further consideration of the implications of the changes to the Framework may be forthcoming, as practitioners across the planning sector begin to unpick them.

In summary, the majority of provisions relating to the historic environment from the original NPPF are retained in the final revised document. Some passages have been re-written or re-ordered for clarity, and largely, we believe that this is successfully achieved. There is, additionally, an improvement in the positioning of the requirement for Local Planning Authorities (LPAs) to maintain or have access to a Historic Environment Record, which is now in the main text.

There should be no major impact on the way the historic environment is managed or any lessening of the weight afford to heritage assets as a result of the revisions.

Advocacy outcomes:

In the [consultation response document](#), published alongside the final draft, Government states that it

“...recognises the importance of the historic environment and has no intention to reduce, whether through the Framework or otherwise, the important protections that exist for it.”

The final revised version incorporates most of CIfA’s top asks and makes other changes that are intended to implement the Government’s stated commitment not to reduce protections for the historic environment. These main changes are listed below:

1) Historic Environment Records

CIfA strongly argued for the inclusion of the requirement for LPAs to maintain or have access to an HER to be included in the main text, as it is a policy, and not a definition. We are pleased that this was accepted, and it is one of the main advances achieved in the new revised document. The new provision is located in paragraph 187 which reads;

“Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and*
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.”*

This provision provides additional contextualisation for new paragraph 189, which sets out how proposals affecting heritage assets are to be dealt with. These policies are unchanged in substance from the original version.

2) Glossary definitions

Alterations in the draft version would have seen the definition of the historic environment dropped and definition of HERs weakened.

ClfA argued that it was necessary to include description of HERs as ‘services’ in order to express the necessary role of specialists to update and interpreting information. The draft re-defined HERs as ‘resources’.

ClfA also argued for the reinstatement of the original definition of historic environment, arguing that dropping the definition made the framework less user-friendly.

In the final document, Government has reinstated the original preferred definitions in both cases.

3) Non-designated assets of archaeological interest

The provision for sites of archaeological interest was relegated to a footnote in the draft text (now footnote 63). This reads;

“⁶³ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”

ClfA argued that this change was likely to be read as a downgrade by practitioners and planning committees. In the consultation response document, Government conceded this point, noting that:

“Concerns were raised, particularly amongst the archaeological sector, that moving the policy on non-designated heritage assets of archaeological interest into a footnote risked the policy being overlooked and could therefore weaken protection for this type of asset. Private sector respondents who commented on this issue were overwhelmingly opposed to the policy itself and considered that non-designated heritage assets should not be treated as equivalent to designated heritage assets.”

Government’s response to this was:

“The policy approach to non-designated heritage assets of archaeological interest, now referred to in footnote 63, is unchanged from the 2012 Framework. However, we have made clear in the introduction to the final Framework that footnotes in the document are an integral part of national planning policy, which needs to be read as a whole.”

This clarification (Paragraph 3) now states:

“The Framework should be read as a whole (including its footnotes and annexes). General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making in chapter 3.”

4) Sustainable development

One concern with the revised draft was that the definition of sustainable development had weakened due to a change to the wording which removed obligation to ensure that economic, social, and environmental gains were sought “jointly and simultaneously”. The revised draft’s removal of this phrase appeared to contradict accepted international definitions of sustainable development, and open the potential for large economic gains to be judged as providing ‘net gain’ and therefore acting as mitigation in itself for environmental or social harm.

The final draft has seen a very minor, but possibly significant change to the text of paragraph 8, adding ‘each of’ as follows:

*“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across **each of** the different objectives [economic, social, and environmental])”*

5) Optimum viable re-use

The final text also reinstates reference to the importance of seeking optimum viable use for heritage assets into the new paragraph 196.

Overall reception:

CiFA is satisfied that many of the changes we proposed have been accepted. We also welcome the opportunity raised to consider how best to support the new policy through revisions to the NPPG.

There will be a period of adjustment necessary, as practitioners get used to new policies, but we will be urging CiFA members to take note of, and to reinforce as necessary, Government’s advice not to read the revisions as decreasing the protection afforded to heritage assets, nor altering the necessity to afford weight to their conservation and investigate their potential archaeological interest in the development management process.

As stated, the majority of the historic environment chapter has remained unchanged and has seen one significant improvement with the inclusion of the policy on maintaining access to an HER into the main text. This is all good news and we are pleased that we were able to improve some of the failings of the draft revisions.

CiFA remains concerned that the revised document has increased the emphasis on development and housebuilding, and reduced mentions of the historic environment that previously occurred throughout the document. The cumulative effect of these mostly minor changes is a policy which puts less emphasis on *sustainable* development and makes it easier to overlook the contribution of the historic environment to character and its potential to create benefits.

Overall, we see the revision as a further step in the Government’s ‘streamlining’ planning agenda designed to increase development and house building. The new version makes many subtle changes which reinforce this particular focus. We believe that this puts pressure on the planning system and makes it harder to ensure that the right development goes in the right places, as so much effort is targeted at maximising productivity to meet development needs.

We will be looking for further opportunities to work with Government and with colleagues across the historic environment and planning sectors to continue to make the case for good regulation which enables effective provisions for conserving the historic environment as part of a system which delivers sustainable development.

Do you have specialist knowledge of this policy area?

Volunteer to be a consultant on CifA policy in this area and help us shape our advocacy.

Email rob.lennox@archaeologists.net for details.

For further information about CifA's advocacy and campaigns and for details on other priority areas, visit www.archaeologists.net/advocacy or email info@archaeologists.net.

