

# ClfA response to NPPF and National Model Design Code: Consultation proposals

*Submitted by online form*

## Introduction

The Government is proposing to make a number of changes to the National Planning Policy Framework and we would like to hear views on the amendments set out in this consultation.

Most of the changes relate to policy on the quality of design of new development, and which respond to the recommendations of the Building Better, Building Beautiful Commission.

We have also taken this opportunity to make a number of environment-related changes, including amendments on flood risk and climate change. The amendments also include a small number of very minor changes arising from legal cases, primarily to clarify the policy. A few minor factual changes have also been made to remove out-of-date text (for example, the early thresholds for the Housing Delivery Test), to reflect a recent change made by Written Ministerial Statement about retaining and explaining statues, and an update on the use of Article 4 directions.

This is not a wholesale revision of the National Planning Policy Framework, nor does it reflect proposals for wider planning reform set out in the *Planning for the Future* consultation document. A fuller review of the Framework is likely to be required in due course to reflect those wider reforms, subject to decisions on how they are to be taken forward.

## Building Better Building Beautiful Commission

The Government convened the Building Better, Building Beautiful Commission with the aim of championing beauty in the built environment, as an integral part of the drive to build the homes that our communities need.

The Government asked the Commission to develop a range of practical measures that will help ensure new housing developments meet the needs and expectations of communities, making them more likely to be welcomed, rather than resisted. The Commission had three primary aims:

- to promote better design and style of homes, villages, towns and high streets, to reflect what communities want, building on the knowledge and tradition of what they know works for their area;
- to explore how new settlements can be developed with greater community consent;
- to make the planning system work in support of better design and style, not against it.

The Commission's report proposed three overall aims. These were: ask for beauty, refuse ugliness and promote stewardship, and made 45 detailed policy propositions. In our response to the Commission, we have accepted their recommendation for a stronger focus on beauty in national planning policy, to ensure the system helps to foster more attractive buildings and places, while also helping to prevent ugliness. This consultation takes forward our commitment to making beauty and place making a strategic theme in the National Planning Policy Framework. We state clearly that poor quality schemes should be refused and, where appropriate, we have replaced references to 'good design' with 'good design and beautiful places'. Several other aspects of the Framework have been updated to reflect the Commission's recommendations.

## National Model Design Code

The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the Government's priorities and provides a common overarching framework for design. The National Model Design Code is intended to form part of the Government's planning practice guidance. It is not a statement of national policy. However, once finalised, the Government recommends that the advice on how to prepare design codes and guides is followed.

A design code is a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The draft National Model Design Code is intended to be used as a toolkit to guide local planning authorities on the design parameters and issues that need to be considered and tailored to their own context when producing design codes and guides, as well as methods to capture and reflect the views of the local community from the outset, and at each stage in the process.

The Government believes that design codes are important because **they provide a framework for creating healthy, environmentally responsive, sustainable and distinctive places**, with a consistent and high-quality standard of design. This can provide greater certainty for communities about the design of development and bring conversations about design to the start of the planning process, rather than the end.

We would welcome views on the application of the draft National Model Design Code in practice and the model processes it sets out. We would be pleased to hear from local planning authorities, neighbourhood planning groups, developers, members of the public and anyone with an interest in the design of new development.

We would be grateful for your views on the National Model Design Code, in terms of

- a) the content of the guidance
- b) the application and use of the guidance
- c) the approach to community engagement

## Summary of proposed amendments to the National Planning Policy Framework

### This revised Framework:

- Implements policy changes in response to the Building Better Building Beautiful Commission recommendations
- Makes a number of changes to strengthen environmental policies – including those arising from our review of flood risk with Defra
- Includes minor changes to clarify policy in order to address legal issues
- Includes changes to remove or amend out of date material
- Includes an update to reflect a recent change made in a Written Ministerial Statement about retaining and explaining statues.

- Includes clarification on the use of Article 4 directions

The sections below outline the main changes proposed to the Framework. A number of chapters remain unaltered, other than consequential changes to page, paragraph and footnote numbers (these are 1, 6, 7 and 10).

## **Questions**

### **Proposed changes to Chapter 2: Achieving sustainable development**

The revised text reflects the Government's response to the Building Better Building Beautiful Commission, and makes a small number of other minor changes:

The wording in paragraph 7 has been amended to incorporate the 17 Global Goals for Sustainable Development which are a widely-recognised statement of sustainable development objectives, to which the UK has subscribed.

Paragraph 8(b) has been amended in response to the Building Better Building Beautiful Commission recommendations to emphasise the importance of well-designed, beautiful and safe places in achieving social objectives of sustainable development.

The wording in paragraph 8(c) has been strengthened to emphasise the role of planning in protecting and enhancing our natural, built and historic environment.

The wording of the presumption in favour of sustainable development (paragraph 11(a)) has been amended to broaden the high-level objective for plans to make express reference to the importance of both infrastructure and climate change.

The final sentence in footnote 8 (referred to in paragraph 11(d)) has been removed as the transitional arrangements for the Housing Delivery Test no longer apply.

### **1. Do you agree with the changes proposed in Chapter 2?**

Yes

#### **Please provide comments:**

We welcome the new wording to paragraph 8c, which provides a stronger wording on the protection and enhancement of our natural, built, and historic environment. We also support the inclusion of UN Sustainable Development Goals.

We are cautious about the BBBC's definition of 'beautiful and safe places' replacing the language of 'built environment' in 8b, as we are concerned that aspects of the built environment – including the role that heritage plays in defining character and identity, could inadvertently fall outside of the intended scope of 'beauty'. For instance, archaeological heritage may be hard to 'see' in the landscape or townscape setting but will still contribute to the character of the built environment. We would welcome additional reflection on the potential for the terminology of the BBBC to harm consideration of these aspects of placemaking.

## **Proposed changes to Chapter 3: Plan-making**

The revised text reflects the Government's response to the Building Better Building Beautiful Commission, and recent legal cases:

In response to the Building Better Building Beautiful Commission recommendations, paragraph 20 has been amended to require strategic policies to set out an overall strategy for the pattern, scale and design quality of places.

Paragraph 22 has also been amended in response to the Building Better Building Beautiful Commission recommendations to clarify that councils who wish to plan for new settlements and major urban extensions will need to look over a longer time frame, of at least 30 years, to take into account the likely timescale for delivery.

Paragraph 35(d) has been amended to highlight that local plans and spatial development strategies are 'sound' if they are consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework, and other statements of national planning policy where relevant. This ensures that the most up to date national policies (for example, Written Ministerial Statements) can be taken into account.

### **2. Do you agree with the changes proposed in Chapter 3?**

Yes

**Please provide comments**

No comment.

## **Proposed changes to Chapter 4: Decision making**

The revised text aims to clarify the policy intention for Article 4 directions:

In order to ensure Article 4 directions can only be used to remove national permitted development rights allowing changes of use to residential where they are targeted and fully justified, we propose amending Paragraph 53, and ask for views on two different options.

We also propose clarifying our policy that Article 4 directions should be restricted to the smallest geographical area possible. Together these amendments would encourage the appropriate and proportionate use of Article 4 directions.

### **3. Do you agree with the changes proposed in Chapter 4?**

No

**Which option relating to change of use to residential do you prefer and why?**

We are concerned that the recent relaxation of permitted development around conversion to residential and the proposed lack of exemption for conservation areas within this proposal makes

article 4 provisions crucial to the protection of conservation areas where conversion to residential would be extremely damaging. Local authorities may rely on these provisions to protect areas where such PDR could have damaging consequences for local heritage.

We particularly object to the proposed alternative within this paragraph, as it could explicitly exclude the use of article 4 directions for conservation areas, which are a form of local designation. We understand that Government's view is that some locations in conservation areas will be suitable for conversion to residential, but we maintain that many are not and as such there must be opportunities for LPAs to limit or direct the use of PDR in those areas. We consider that the existing wording relating to the protection of 'local amenity and well-being' of the area is sufficient.

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

The revised text aims to clarify the existing policy and reflects the Government's response to the Building Better Building Beautiful Commission and recent legal cases:

New paragraph 65 has been amended to clarify that, where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. This is to address confusion as to whether the 10% requirement applies to all units or the affordable housing contribution.

New paragraph 70 has been amended to remove any suggestion that neighbourhood plans can only allocate small or medium sites. This was not the policy intention, so the wording has therefore been amended to clarify that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with new paragraph 69a) suitable for housing in their area.

New paragraph 73 has been amended to reflect Chapter 9: "Promoting sustainable transport" in ensuring that larger scale developments are supported by the necessary infrastructure and facilities including a genuine choice of transport modes. New paragraph 73(c) has also been amended in response to the Building Better Building Beautiful Commission's recommendations to clarify that when planning for larger scale development, strategic policy making authorities should set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles) and ensure that masterplans and codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community.

Footnote 40 (referred to in new paragraph 74(c)) has been updated to reflect that the Housing Delivery Test has now come into effect.

New paragraph 80(d) has been amended in response to legal cases in order to clarify that the curtilage does not fall within the scope of this policy.

New paragraph 80 (e) has been amended in response to the Building Better, Building Beautiful Commission's policy proposition 1 e) that it opens a loophole for designs that are not outstanding, but that are in some way innovative, and that the words 'or innovative' should be removed. This change is not proposed to rule out innovative homes, rather that it will ensure that outstanding quality can always be demanded, even if an innovative approach is taken.

## **4. Do you agree with the changes proposed in Chapter 5?**

Yes

**Please provide comments**

No comment.

## **Proposed changes to Chapter 8: Promoting healthy and safe communities**

The revised text seeks to clarify existing policy:

New paragraph 92(b) includes minor changes to help to clarify Government's expectations for attractive pedestrian and cycle routes. This supports the Building Better Building Beautiful Commission's recommendations on supporting walkable neighbourhoods.

New paragraph 97 has been amended to emphasise that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and efforts to address climate change.

### **5. Do you agree with the changes proposed in Chapter 8?**

Yes

**Please provide comments**

No comment.

## **Proposed changes to Chapter 9: Promoting sustainable transport**

The revised text reflects the Government's response to the Building Better Building Beautiful Commission:

New paragraph 105(d) has been amended to support the Building Better, Building Beautiful Commission's recommendations on encouraging walking and cycling.

New paragraph 109(c) and supporting footnote 45 has been amended to prevent continuing reliance by some authorities on outdated highways guidance. Our amended wording states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that the design of schemes and standards applied reflects current national guidance, including the National Design Guide and National Model Design Code.

### **6. Do you agree with the changes proposed in Chapter 9?**

Yes

**Please provide comments**

No comment.

## **Proposed changes to Chapter 11: Making effective use of land**

The revised text reflects the Government's response to the Building Better Building Beautiful Commission:

New paragraph 124 has been amended to include an emphasis on the role that area-based character assessments, codes and masterplans can play in helping to ensure that land is used efficiently while also creating beautiful and sustainable places.

### **7. Do you agree with the changes proposed in Chapter 11?**

Yes

#### **Please provide comments**

We welcome the amendment to new paragraph 124. We support the use of area-based character assessments, including conservation areas assessments, and historic landscape characterisation in the design of 'beautiful and sustainable places'.

## **Proposed changes to Chapter 12: Achieving well-designed places**

The revised text reflects the Government's response to the Building Better Building Beautiful Commission:

New paragraphs 125 and 127 have been amended to include the term "beautiful" in response to the Building Better Building Beautiful Commission's findings. This supports the Building Better Building Beautiful Commission's recommendation for an overt focus on beauty in planning policy to ensure the planning system can both encourage beautiful buildings and places and help to prevent ugliness when preparing local plans and taking decisions on planning applications

New paragraph 126 has been amended to clarify the role that neighbourhood planning groups can have in relation to design policies.

New paragraph 127 has been amended to emphasise that all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code and which reflect local character and design preferences.

A new paragraph 128 has been added in response to the Building Better Building Beautiful Commission's recommendations and our manifesto commitment to give communities greater say in the design standards set for their area. This reflects the Government's proposals for a National Model Design Code, which will include a model community engagement process, and will create a framework for local authorities and communities to develop a more consistent approach which reflects the character of each place and local design preferences. It also clarifies that the National Design Guide and the National Model Design Code should also be used to guide decisions on planning applications in the absence of locally produced guides or codes.

A new paragraph 130 has been added to reflect the findings of the Building Better Building Beautiful Commission and the Government's ambition to ensure that all new streets are tree-lined, and that existing trees are retained wherever possible.

New paragraph 132 and footnote 50 have been updated to refer to Building for a Healthy Life.

New paragraph 133 responds to the Building Better Building Beautiful Commission's recommendations to make clear that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. In addition, it clarifies that significant weight should be given to development which reflects local design policies and government guidance on design.

## **8. Do you agree with the changes proposed in Chapter 12?**

Yes.

### **Please provide comments**

We support paragraph 130 that 'new streets should be tree lined' wherever this is appropriate. The caveat provided in footnote 49, however, is crucial. There may be various reasons why tree-lined streets might be inappropriate in some locations. For example, in areas of substantial below ground archaeology, tree planting and root spread would need to be considered as a factor possibly requiring additional archaeological mitigation. This does not mean trees cannot be planted subject to archaeological mitigation or lower impact options (eg trees in planters), but there should be an option for applicants and decision-makers to not be forced to include tree lined streets, if there are strong environmental reasons not to. In due course, an appropriate explanation of 'justifiable and compelling reasons why this would not be possible' should be included in National Planning Practice Guidance, with that list that specifies archaeological impact as a possible reason.

## **Proposed changes to Chapter 13: Protecting the Green Belt**

The revised text seeks to clarify existing policy:

New paragraph 149(f) has been amended slightly to set out that development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order, is not inappropriate in the Green Belt provided it preserves its openness and does not conflict with the purposes of including land within it.

## **9. Do you agree with the changes proposed in Chapter 13?**

Yes.

### **Please provide comments**

No comment.

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

The revised text seeks to strengthen environmental policies, including clarifying some aspects of policy concerning planning and flood risk.

The changes proposed are in part, an initial response to the emergent findings of our joint review with the Department for Environment, Food and Rural Affairs (Defra) of planning policy for flood risk. The government's Policy Statement on flood and coastal erosion risk management sets out a number of actions to maintain and enhance the existing safeguards concerning flood risk in the planning system. Informed by this, we will consider what further measures may be required in the longer term to strengthen planning policy and guidance for proposed development in areas at risk of flooding from all sources when our review concludes.

On planning and flood risk, new paragraphs 160 and 161 have been amended to clarify that the policy applies to all sources of flood risk.

New paragraph 160(c) has been amended to clarify that plans should manage any residual flood risk by using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

The Flood Risk Vulnerability Classification has been moved from planning guidance into national planning policy (set out in Annex 3 and referred to in paragraph 162). It is considered that this classification is a key tool and should be contained in national policy.

New paragraph 163 has been amended to clarify the criteria that need to be demonstrated to pass the exception test.

New paragraph 166(b) has been expanded to define what is meant by "resilient".

### **10. Do you agree with the changes proposed in Chapter 14?**

Yes

**Please provide comments**

No Comment.

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

The revised text seeks to clarify existing policy and reflects the Government's response to the Building Better Building Beautiful Commission:

New paragraph 175 has been amended in response to the Glover Review of protected landscapes, to clarify that the scale and extent of development within the settings of National Parks and Areas of

Outstanding Natural Beauty should be sensitively located and designed so as to avoid adverse impacts on the designated landscapes.

New paragraph 176 has been separated from the preceding paragraph to clarify that this policy applies at the development management stage only.

New paragraph 179(d) has been amended to clarify that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around other developments should be pursued as an integral part of their design, especially where this can secure measurable net gains for biodiversity and enhance public access to nature.

## **11. Do you agree with the changes proposed in Chapter 15?**

Yes

### **Please provide comments**

We support the changes in this section, including the changes to new paragraph 175, which provide positive clarification on the need for sensitive location of development within designated landscapes. However, the use of the word 'setting' – to refer to the areas outside national park boundaries but where development may impact upon the designated landscape – is potentially confusing and requires clarification. The use of the word 'setting' also has technical meaning in respect of heritage assets (as per NPPF glossary) and is also used in relation to green belt and other landscapes. Thus, if this term is favoured it should be defined clearly in the glossary under a new heading "Setting of designated landscapes". This may also be of use for clarifying setting of conservation areas. We would welcome consistency in the language used to describe this, and we note that the Glover review refers to areas that 'buffer' National Parks.

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

The revised text seeks to reflect a change made to national planning policy by a Written Ministerial Statement on protecting our nation's heritage dated 18 January 2021.

New paragraph 197 has been added to clarify that authorities should have regard to the need to retain historic statues, plaques or memorials, with a focus on explaining their historic and social context rather than removal, where appropriate.

## **12. Do you agree with the changes proposed in Chapter 16?**

No

### **Please provide comments**

With reference to the new paragraph 197, we note that historic statues and plaques are an important part of our historic environment, which is why many of them are designated and many others are non-designated heritage assets by virtue of their heritage significance. However, we are concerned that new provisions will create different levels of protection for statues, plaques, or memorials compared

to other non-designated heritage assets. This undermines the logic of existing processes for understanding the significance of heritage assets.

We suggest that it would be more sensible to extend the new paragraph 198 to include all locally listed heritage assets in order to ensure there is a consistent approach to ensuring that all heritage assets are subject to appropriate consideration of the 'importance to retain' and ensuring that heritage assets cannot simply be demolished or converted in a way which damages significance, without being subject to a planning application.

We would also like to propose an additional change within this chapter, to new paragraph 193 (old paragraph 189). This change would correct an unintentional flaw in the current wording which creates confusion about what type of information applicants must supply to local planning authorities in order to facilitate assessment of the impact of application on heritage assets.

This change is minor, uncontroversial, and would be in the interest of improving clarity of meaning around existing policy.

We therefore propose that a simple clarification of new Paragraph 193:

189. In determining applications, local planning authorities should require an applicant to **describe the significance of any heritage assets affected and provide an assessment of the potential impact of the proposed development on that significance.** The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

This amendment has the effect of clarifying that while LPA archaeologists are ultimately responsible for determining the impact of a proposal on the significance of heritage assets, it is a requirement of the NPPF to ensure sufficiently detailed evidence is provided to enable this decision-making to take place (NPPF para.189) **and** to do this it is necessary to submit evidence of the impact that the proposals will have on the significance of heritage assets as well as simply describing the significance of the asset.

Although it is already common to provide an impact assessment to the LPA, at present the NPPF does not make this a clear requirement, with some interpretations suggesting that an applicant only needs to provide a statement of significance, and not information on how the applicant affects that significance.

Withholding information on impact assessment from the LPA is likely to negatively impact the effectiveness of the decision-making process, increase chances of refusal, and lead to an increased reliance upon appeal process and as a consequence slower and most costly applications. Good communication with LPA decision-makers improves processes.

The current wording also cuts across professional best practice. For instance, ClfA's Standard and Guidance for Desk-Based Assessment requires practitioners to include information about impact assessment and mitigation options within the Desk-Based Assessment. We also recommend that ClfA professionals involved in the production of statements of significance also follow this approach.

National Planning Practice Guidance implies that understanding impact assessment is the goal of providing information on significance as part of what is provided to LPAs to aid decision-making (NPPG Paragraph 18a-009-20190723).

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

Minor changes have been made to clarify existing policy.

New paragraph 209(c) has been amended to refer to Mineral Consultation Areas in order to clarify that this is an important mechanism to safeguard minerals particularly in two tier areas, and to reflect better in policy what is already defined in Planning Practice Guidance.

New paragraph 210(f) has been amended to reflect that some stone extraction sites will be large and serve distant markets.

### **13. Do you agree with the changes proposed in Chapter 17?**

Yes

**Please provide comments**

No comment.

### **14. Do you have any comments on the changes to the glossary?**

Yes.

**Please provide comments**

It would be valuable to have a definition for 'beauty' given the new prominence for the term in the proposed revisions. This definition should include broad representation of aspects of local character, history, archaeological heritage (whether visible above ground or not) or at least explain the relationship between beauty and these other relevant factors for placemaking.

We would also welcome, as discussed above, a glossary entry for 'setting of designated landscapes'.

### **15. We would be grateful for your views on the National Model Design Code, in terms of a) the content of the guidance b) the application and use of the guidance c) the approach to community engagement**

**Please provide comments**

a) The content of the guidance

We are pleased that the guidance contains strong references to local character and heritage considerations. However, as stated above, we are cautious about the BBBC's definition of 'good design' and 'beauty' as we are concerned that where this displaces language of 'placemaking', that

some aspects of the built, historic, and natural environment – including the role that heritage plays in defining character and identity, could inadvertently fall outside of the intended scope.

For instance, archaeological heritage may be hard to ‘see’ in the landscape or townscape setting but will still contribute to the character of the built environment and landscape, whether visible above ground or not. We would welcome additional reflection on the potential for the terminology of the BBBC to harm consideration of these aspects of placemaking.

We also note that the language of the ‘historic environment’ is entirely absent from the guidance and it would be valuable to ensure that this does not make it more difficult to draw upon historic landscape characterisation, information in historic environment records, and specialist advice from historic environment advisors in local planning authorities to inform the development of local design codes and to inform masterplan design.

There will be historic environment concerns which permeate all ‘coded’ areas, and each of these areas will have historic character that partly shapes their present day coding. The guide could helpfully express this in the section on Coding.

In paragraph 25, on scoping, we disagree with the use of the phrase “Codes are not expected to cover all of these issues”. We think this would be better stated as “Codes do not need to cover all of these issues” to provide less of a suggestion that codes should not cover all 10 issues.

In the section on Baseline, it would be valuable to include a reference to Historic Environment Records and Historic Landscape Characterisation studies that local authorities will already have access to. Other information which a local authority may or may not wish to obtain could also be considered, for example archaeological sensitivity mapping.

Masterplanning for larger development sites represent considerable opportunities for high quality design. The benefit of the masterplanning process is that design details can be discussed and developed in detail. Many of the best examples of innovative design in development projects come from projects which integrate historic environment advice in the masterplanning process. It would be an extremely valuable exhortation to best practice to include a reference to engaging expertise, specifically historic and natural environment specialists, at a masterplanning stage within the section of the guidance, for example in Figure 11.

Chapter 3.A on Guidance for Area types should contain a page on Cultural Heritage, similar to the one on Nature. In the guidance notes it is encouraging to see the references to Cultural Heritage in section C2 under context, but more could be done in following sections to underline the contribution that cultural heritage makes to distinctive and resilient places. For example, green spaces (N. 1) are often historic in character and include heritage assets above and below ground. The guidance acknowledges this in para. 58 but referring to ‘Natural Spaces’ (p.18) and ‘natural green space’ (p.21) may obscure opportunities to safeguard and enhance the contribution of cultural elements to local identity, sense of place and wellbeing. Cultural Heritage could be usefully added to 21 Open Space Design. Similarly, understanding the historic character of many watercourses is fundamentally important to addressing water and drainage (N2) – both to avoid problems and to add to the identity and distinctiveness of places by drawing attention to and enhancing historic water-related features. Greater attention to the historic relationship between local communities and water can make an important contribution to resilience, in the sense of ‘a nation ready to respond and adapt to flooding and coastal change’ (FCERM Strategy).

b) The application and use of the guidance

No comment.

c) The approach to community engagement

No comment.