



Alan C Scott
National Planning Policy Framework
Department for Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU

Dear Sir / Madam,

Land Forum Response to the National Planning Policy Framework Consultation

The Land Forum is a common interest group promoting the sustainable use of land. It includes a wide range of representative groups and stakeholders from both the private and public sectors and aims to take a strategic overview of current and future land use issues. The Land Forum has picked out some high level areas of consensus from its members for inclusion in the response to the NPPF below.

It should be noted that this response does not necessarily reflect the opinion of all individual Land Forum members or member organisations, and in particular is not representative of views from Government bodies who sit on the Forum. The Forum members that support this view are listed at the end of this response. Many individual member organisations will respond in more detail to the consultation by themselves or through other representative bodies.

The following list represents the common views shared by the Land Forum representation as described above.

1. The Framework document defines sustainable development in relation to its three normal strands of economic, social and environmental factors (paragraph 10). The majority of our members believe that the economic aspect is overemphasised in the document, and we would urge that sustainable decisions should be based upon a balanced consideration of these factors. The definition of sustainability features in two locations – paragraph 12 states that all the policies in the Framework document define sustainable development, in contrast to a simpler definition set out in paragraph 10. The Framework should only be based on one definition.
2. Whilst the shortening of the overall policy on development is laudable, the loss of effectively all underpinning guidance such as PPS and PPG documents leaves a vacuum which must be addressed. It is recognised that guidance can be slimmed down, but the some of the key elements of former PPS documents needs to be retained in concise form.

3. The consultation indicates that a wide range of policy/guidance documents are being withdrawn. The Land Forum suggests that key aspects of the present policy and guidance which are being omitted are replaced by a short focussed summary guidance document. This will ensure more consistent delivery of planning decisions across the country.
 - By way of example, the key aspects of a PPS may be condensed down to a 2-3 page chapter of a new guidance document, focussing on the main messages.
 - In PPS 23, we must not lose the principle regarding responsibility for delivering sites which are suitable for new uses. The current regime is clear that the Developer retains ultimate responsibility for remediation, and this should remain as a clearly stated principle. If it is lost, it will create confusion and conflict and could result in a cost burden on the public purse for sites that are not made suitable for use through planning.
 - Guidance should pick up on the presently used themes of land being made "suitable for use". Further clarity is needed to prevent the perpetuation of the contradiction between 'safe' (NPPF paragraph 163) and 'suitable for use' (164) currently embedded in PPS23.
4. The Land Forum supports the concept of sustainable land use in the NPPF; namely that the best piece of land should be used for the proposed end use regardless of whether it is greenfield or brownfield. However paragraph 19 'prefer land of lesser environmental value' and paragraph 165 'allocate land with the least environmental amenity value' only tangentially refer to brownfield. Without full and proper emphasis, the numerous sustainable benefits that brownfield regeneration brings are likely to be reduced.
5. Robust definitions are required on many ambiguous words and statements. It is recognised and accepted that localism will result in stronger local decision making based on local conditions. However, the additional inconsistency which flows from a lack of clarity in the NPPF will increase operating risks for multi-regional or national organisations.
6. The Glossary needs to be expanded.
7. Guidance needs to support, advise and assist on how the Framework should be implemented on a local level, to help establish a greater level of certainty and consistency in its application.
 - This especially needs to cover the balancing of the 3 pillars of sustainability in the context of creating Local Plans.
 - This should concentrate on providing as greater clarity as possible as the best method of reducing uncertainty and associated problems in operating under the Framework.
 - The useful 'myth-busting' NPPF section on the CLG website needs to be incorporated into the guidance, as it seems that these details are critical in being able to clearly operate under the new NPPF.
8. The introduction of the new framework will create a substantial pressure on having up to date Local Plans, and the transition period for introduction should be of sufficient length to allow updating and/or publication of new Plans

Land Forum Members Represented by this Consultation Response

- Association of Geotechnical Specialists (AGS)
- Strategic Forum for Construction; & UK Contractors Group
- Local Authority Contaminated Land Officers
- Contaminated Land: Applications In Real Environments (CL:AIRE)
- Environmental Industries Commission (EIC)
- Environmental Law Association
- Environmental Protection UK (EPUK)
- Home Builders Federation (HBF)
- The Land Trust
- Planning Officers Society
- The Soil and Groundwater Technology Association (SAGTA)
- Specialist in Land Condition (SiLC)
- Society of Brownfield Risk Assessment (SoBRA)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Crowcroft'.

Phil Crowcroft
Chairman, Land Forum