



RSPB view: the final National Planning Policy Framework

April 2012

Background

England's planning system plays an extremely important role in delivering sustainable development, by protecting and restoring nature, whilst also providing the houses and business that society needs.

The Government published its long-awaited National Planning Policy Framework (NPPF) for England on 27 March. The NPPF condenses more than 1,000 pages of policy into around 50 pages, and will be a key document which local authorities must take into account when preparing plans and taking decisions on planning applications.

The Government's draft version (July 2011) had proved extremely controversial as it clearly prioritised economic growth above social and economic considerations, and included a 'presumption in favour of sustainable development', that would have made it far more difficult to refuse environmentally damaging development, even on Sites of Special Scientific Interest (SSSIs).

A view from the RSPB on the final NPPF

The final NPPF is a dramatically-improved document, and it is clear that the Government has listened seriously to our concerns. The RSPB had three red lines for a successful NPPF, and these have all been met:

- The definition of sustainable development is based on the five guiding principles of the UK Sustainable Development Strategy, including living within environmental limits;
- The 'presumption in favour of sustainable development' has been reframed to exclude developments that should be refused because of specific restrictive policies such as Natura 2000 sites, SSSIs, Green Belt etc, and the damaging phrase "the default answer to development is 'yes'" has been deleted;
- Nature conservation policies have been strengthened, with new references to ecosystem services, coherent ecological networks, Nature Improvement Areas, Local Nature Partnerships, and a more explicit policy protecting SSSIs.

As a result of the changes made to the document, protection for the natural environment in the NPPF now compares favourably with that under the previous planning system. Internationally important sites protected under the Wild Birds and Habitats Directives, nationally important sites (SSSIs), local wildlife sites and biodiversity outside of these areas receive a similar level of protection to that through the former Planning Policy Statement 9 (PPS9) on biological conservation.

In terms of policies for the enhancement of the natural environment, the NPPF is arguably more positive than PPS9. From the ministerial foreword to planning principles to plan making, the role of the planning system in enhancing the natural environment is cited in several key parts of the document. Since the NPPF incorporates virtually all national planning policy into a single document, these policies are likely to have greater prominence than previously.

Section 11 of the NPPF contains several exciting new policies specifically targeted at enhancing the natural environment, and biodiversity in particular. These take forward the commitments made in [Natural Choice](#), the Government's Natural Environment White Paper. For example:

“Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure...”
[paragraph 114]

“To minimise impacts on biodiversity and geodiversity, planning policies should:

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;...*
- *where Nature Improvement Areas¹ are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.”* [paragraph 117]

Combined with the welcome reference to ‘providing net gains in biodiversity’ (paragraph 129), these policies could spearhead a much-needed era of positive planning for the natural environment, which not only protects our remaining and depleted levels of biodiversity, but restores some of what has been lost.

The NPPF remains a profoundly pro-growth document. The RSPB recognises the role the planning system has to play in relieving the housing crisis and stimulating economic growth. However, if we are to see truly sustainable development, the building of new housing, businesses and infrastructure must avoid damage to the natural environment. Whilst the RSPB believes that the policies contained within the NPPF are capable of protecting and enhancing the natural environment, its success will depend on how well it is implemented in plan-making and decision-taking at the local level.

Local planning authorities across England with policies adopted since 2004 may still give full weight to them for 12 months, even if there is a limited degree of conflict with the NPPF. Otherwise, existing policies are given weight according to their consistency with the NPPF. Advice is available from the Local Government Association, the Planning Inspectorate and the Department for Communities and Local Government to help with local plan updates. Whilst these transitional arrangements are welcome, some local planning authorities may still struggle to bring forward up-to-date local plans.

These latest reforms of the planning system come at a time when local planning authorities in England are more stretched than ever before. In many areas, local authority ecologists and budgets for biodiversity work have been amongst the first to suffer cutbacks. This leaves many local authorities under-resourced to protect and enhance the natural environment in the way the NPPF sets out, which could lead to reduced standards and an increase in damaging developments.

As the NPPF and other changes to the planning system take effect, the challenge for the Government is to put in place research and monitoring arrangements that will allow the Government, stakeholders and the wider public to tell whether the planning system is delivering on its stated objectives, including for nature.

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¹ The concept of [Nature Improvement Areas](#) was established in *Natural Choice*. These are landscape-scale areas where local partners come together to make significant and coordinated enhancement of the natural environment.