

ESSEX PLANNING

**EPOA**

OFFICERS' ASSOCIATION

10 May 2018

Planning Service  
Essex County Council  
Market Road  
Chelmsford  
CM1 1QH

By email: [planningpolicyconsultation@communities.gsi.gov.uk](mailto:planningpolicyconsultation@communities.gsi.gov.uk)

Dear Sir/Madam,

**RE: CONSULTATION ON REVISED NPPF**

The Essex Planning Officers Association (EPOA) represents 12 Local Planning Authorities in Essex, as well as two unitary authorities (Thurrock and Southend-on-Sea). EPOA is comprised of Heads of planning departments from the authorities and discuss planning issues affecting the whole of Essex, and produce planning guidance documents, which are adopted as county wide policy.

Please find attached the response from EPOA to the consultation on the potential revision to the National Planning Policy Framework (NPPF). This consultation response focuses on the strategic aspects of the proposed revisions only and individual local planning authorities, and Essex County Council, within Essex have made their detailed responses separately where required.

Kind regards



**Graham Thomas**  
**Chairman Essex Planning Officers' Association**

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## **National Planning Policy Framework**

### **Essex Planning Officers' Association (EPOA) - Strategic Response**

The Essex Planning Officers' Association (EPOA) has agreed the following responses to consultation on the revisions to the National Planning Policy Framework (NPPF).

This consultation response focuses on the strategic aspects of the proposed revisions and individual local planning authorities, and Essex County Council, within Essex have made their detailed responses separately where required.

#### **General**

The EPOA welcomes in general terms the restructuring of the NPPF and the introduction of wide ranging reforms to improve the supply of new homes. The improved clarity in the application of the presumption in favour of sustainable development and a more standardised approach to assessing housing need, viability and measuring housing delivery are all welcomed.

However, the redistribution and amendment of the Core Planning Principles of the existing NPPF (paragraph 17) across the new draft, dilutes the key national planning policy messages to more subject based objectives that potentially will be read and interpreted in isolation from one another. This is particularly evident when considering the importance and role of economic growth to all aspects of planning, in particular to housing delivery.

#### **Diminished Focus on Economic Growth**

The EPOA acknowledges that planning policy reforms are required to ensure that the right number and type of new homes are built in the right places. However, in the drive to address housing delivery, the redrafted NPPF when read as a whole, has diluted national planning policy's ability to proactively drive and support sustainable economic growth. As set out above, the loss of the Core Planning Principles has highlighted this policy disconnect.

The cross-cutting nature and importance of economic growth for all types of development, including housing, means that it should be the starting point for national planning policy. A reference could then be made in subsequent sections to the importance to deliver housing and jobs in a joined-up manner to reduce congestion, improve air quality and quality of life and promote sustainable transport.

#### **Housing Delivery**

Although the measures to improve housing delivery are broadly welcomed, the emphasis on delivery has eroded the broad place-making objectives to create new communities where people want to live. Essex local authorities have taken up this challenge and are promoting Garden Communities in three new settlements in North Essex (Braintree, Colchester and Tendring), North East Chelmsford Garden Village, Dunton Hills Garden Village Brentwood and Harlow and Gilston Garden Town. See comments below.

## **Design**

Whether development proposals are well-designed is a subjective issue and surrounding site context is very seldom uniform. The existing NPPF allows decision makers to assess whether development proposals are acceptable in design terms essentially on a case-by case basis using the decision-makers judgement alongside policies and guidance.

Although reference is still made in the draft revisions to poor design being a reason to refuse planning permission, the new text highlights that design should not be used as a valid reason to object to proposals if they accord with clear expectations in local policies. It is very unlikely that local policies will be able to cover the wide range of design judgements through criteria which means that a case by case assessment will still need to be made. The revised text has the potential to undermine this important facet in decision-making and may lead to a more formulaic and ironically less innovative approaches to design.

## **Garden Communities and TCPA Garden City Principles**

EPOA considers that the promotion of the Garden City principles set out in the existing NPPF (paragraph 52) should be reinstated and reinforced in the revised NPPF. These principles highlight the importance in accelerating housing delivery, improving place-shaping and creating new communities. These principles underpin the North Essex Garden Communities Charter and are incorporated into emerging Local Plan policies, where new Garden Communities are proposed. Garden City principles are also being followed for the Harlow Gilston Garden Town and were included in the Uttlesford Local Plan (Regulation 18) to support proposed Garden Communities within the district.

There is concern that place policy measures to increase housing delivery have eroded the broad place-making objectives that support sustainable development and the creation of communities. Essex local authorities have taken up this challenge and are promoting Garden Communities in three new settlements in North Essex (Colchester Braintree Borders, Tendring Colchester Borders and West of Braintree); North East Chelmsford Garden Village; Dunton Hills Garden Village, Brentwood; Gilston Garden Town; and Uttlesford (North Uttlesford, Easton Park and West of Braintree).

In addition, ECC, and some seven local authorities, are signatories to the Joint Statement prepared by the TCPA for the re-introduction of TCPA Garden Community principles in NPPF.

See link below.

<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=02a95768-1e3a-44e2-97ed-3badb39510e1>