



**WWF-UK**

*Registered office*  
Panda House, Weyside Park  
Godalming, Surrey, GU7 1XR

Tel: +44 (0)1483 426444  
Fax: +44 (0)1483 426409  
info@wwf.org.uk  
wwf.org.uk

## PARLIAMENTARY BRIEFING

# National Planning Policy Framework: Debate

---

19<sup>th</sup> October 2011

---

### Summary

- WWF believes that the draft NPPF should be subject to a Strategic Environmental Assessment (SEA) and recommends the Government undertake a screening assessment immediately.
- WWF considers that the presumption in favour of sustainable development, as currently drafted, is actually a presumption in favour of any, and all, development. Without fundamental amendment it may cause significant damage to the natural environment and the integrity of the planning system.
- Whilst the draft NPPF goes some way to providing useful policy on the application of the duty to cooperate, WWF feels that there is still a need for more detailed guidance to establish an effective framework for strategic planning and assist local authorities in addressing matters of strategic importance.

### Introduction

WWF is a keen advocate of sustainable development and works hard with the government, business and communities to ensure that we can live within environmental limits. The Government has confirmed that it is taking forward a pro-growth agenda to address the economic deficit. WWF is not against growth and economic development, yet we strongly believe that growth must be sustainable and respect environmental limits.

### Impact Assessment

On sustainable development, it does not appear that there has been any use of the assessment proforma and guidance developed by Defra<sup>1</sup>. There is no consideration of intergenerational impacts, which are included within the proforma. Rather, the assessment is focused on the presumption and justifying its inclusion within the draft NPPF by reference to the intentions behind introducing it, instead of identifying and assessing the impacts that may

---

<sup>1</sup> WWF appreciates that this is currently being reviewed and updated by Defra. However, not even the current proforma has been used within this impact assessment



President: HRH Princess Alexandra,  
The Hon Lady Ogilvy KG, GCVO  
Chair: Ed Smith  
Chief Executive: David Nussbaum

WWF-UK a charity registered in England and Wales number 1081247 and in  
Scotland number SC039593, a company limited by guarantee registered in  
England number 4016725. VAT number 733 761821  
100% recycled paper

actually arise in practice. As a result, WWF considers the specific impact test for sustainable development to be completely inadequate and contrary to the commitments from the government within the 'Mainstreaming Sustainable Development' vision. WWF recommends that this assessment is carried out again and follows the proforma and guidance issued by Defra. We also encourage DCLG to work closely with Defra on ensuring this is completed in a satisfactory way.

WWF strongly believes that the draft NPPF should have been developed with the aid of a Strategic Environmental Assessment (SEA), which would provide robust and detailed evidence on the likely significant environmental impacts of its policies and the presumption in favour of sustainable development. We understand that it is the Government's position that an SEA is not required because the draft NPPF is a policy document and not a 'plan or programme' to which the SEA Directive<sup>2</sup> applies. However, WWF considers that the Directive may in fact apply because the draft NPPF is effectively bringing about a modification of the development plan.

### **Presumption in favour of sustainable development**

We welcome the statement in the foreword to the draft NPPF by the Rt Hon Greg Clark MP that "the purpose of planning is to help achieve sustainable development" and the explicit reference that development plans must aim to achieve the objective of sustainable development. It is our view that the planning system is the principal mechanism through which sustainable development can be achieved as it provides decision makers with the framework within which both short and long-term public interest considerations can be taken into account. The planning system plays a determinative and proactive role in the achievement of sustainable development and, as such, the NPPF should recognise that the key role of the planning system is to further or promote the achievement of sustainable development.

However, it is disappointing that the integrated approach required to achieve sustainable development is immediately dismantled in the very opening paragraph of the introduction in the draft NPPF, as it refers only to economic and societal aspects of the planning system. Reference to the natural and historic environments appears in the second paragraph, but not in a way that promotes the use of positive planning for the environment. Instead it is something to be considered and addressed only as part of development, as an impact to be managed. This fails to recognise the role of the planning system in contributing to the maintenance and enhancement of the natural environment, which affords both short and long-term benefits to wildlife and people. It also reinforces the assumption that economic and social considerations are paramount when local planning authorities are considering development proposals. WWF would prefer to see the (welcome) reference to the role of the planning system in securing a sustainable future moved from paragraph 2 to the opening paragraph, as well as recognition that shaping the places where people live and work is also about positive planning for the environment. This would reinforce the point that economic, social and environmental concerns are to be given equal consideration when local planning authorities make decisions within the ambit of the NPPF.

Reading the draft NPPF as a whole, it is clear that the inconsistent policy direction throughout serves to completely undermine using the planning system to deliver sustainable development.

### **Definition of Sustainable Development**

WWF is deeply concerned that the draft NPPF is intending to create a market-led planning system, driven by economic interests and the attainment of economic growth, which in the

---

<sup>2</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, which is transposed in UK law by the Environmental Assessment of Plans and Programmes Regulations 2004.

process is redefining sustainable development and undermining other measures to achieve it. The inclusion of a presumption in favour of 'sustainable development' and changes to objectives for economic policy represent a dramatic shift from the current system. We feel it is disingenuous for the Government to present this consultation as a mere exercise to consolidate, simplify and streamline planning policy when the re-draft is resulting in quite significant changes to the objectives and policy in current PPSs. For instance, the use of the term 'sustainable development' throughout the draft NPPF evidences either a misunderstanding of its meaning and how to apply it in practice, or a real intent to shift the balance and focus to the economic pillar – which in the long term can only be detrimental to the environment and society.

The role of the NPPF should be to provide more detail on what sustainable development means in a planning context. It should provide key principles and minimum standards to help interpret the definition of sustainable development for practical application at the local level. It should guide local authorities and communities on what criteria, indicators and other mechanisms they may need to ensure that their communities and development are sustainable and fit within the overarching definition.

For local authorities, sustainable development should be about considering policy development, service delivery and organisational management in a holistic way.

### **Duty to Co-operate**

WWF considers that the NPPF is a crucial component of the new framework for strategic planning because the duty to cooperate in the Localism Bill must be supported by clear and robust policy. WWF has been heavily engaged in the development of the provisions on the duty to cooperate to try and strengthen it. We strongly believe that both the duty and the NPPF must require local authorities to progress beyond the act of consultation through the exchange of information and to proactively seek cooperation with other relevant authorities and organisations to address strategic matters across boundaries. Voluntary arrangements for strategic planning may not be sufficient in allowing local authorities to resolve contentious issues that impact across administrative boundaries.

WWF considers that the policies on strategic planning in the draft NPPF go some way to helping provide a suitable framework. However, given that this is a relatively new policy area seeking to provide a completely different approach to strategic planning, WWF believes that more detailed guidance will be required to assist local authorities to understand how compliance with the duty to cooperate can be achieved.

WWF remains concerned that in an effort to be less prescriptive, the framework for strategic planning will not provide solutions to situations where local authorities just cannot agree or cooperate. More consideration needs to be given to what sanctions may be applicable in these cases, how disputes may be resolved and how local authorities can be held to account. WWF is not convinced that failing to pass the soundness test for a local plan or the application of the presumption will be appropriate sanctions in all cases. There may be times where more forceful intervention is required to ensure that local authorities properly work together to address strategic matters.

<b>Contact</b>	Margaret Ounsley
<b>Email/Tel</b>	<a href="mailto:mounsley@wwf.org.uk">mounsley@wwf.org.uk</a> / 01483 412389
<b>Date</b>	19 <sup>th</sup> October 2011

1961-2011: 50 years of conservation. WWF works in over a hundred countries to protect the natural world, tackle climate change and promote sustainable consumption.

Download Briefings at [wwf.org.uk/parliamentary](http://wwf.org.uk/parliamentary)

