



WORLD HERITAGE UK DRAFT RESPONSE TO REVISED DRAFT NPPF

World Heritage UK

World Heritage UK is an organisation set up in 2015 to undertake networking, advocacy and promotion for the UK's 31 outstanding World Heritage Sites, and the Tentative List Sites progressing towards World Heritage Site status. World Heritage UK is the only organisation *exclusively* focused on World Heritage in the UK, and the only one that is led by the Sites themselves.

As a State Party to the World Heritage Convention, the United Kingdom is required to protect, preserve, present and transmit to future generations its World Heritage Sites. It does this primarily through its planning systems.

The views set out in this response are based mostly upon work done by World Heritage UK in the last year or so to identify how the planning systems in the UK help to deliver the State Party's responsibilities, and how the systems could be improved. Its findings will be set out in its Planning Position Statement. In this context, World Heritage UK welcomes the opportunity to comment on the Draft Revised National Planning Framework.

It is worth noting that England's World Heritage Sites include a wide range of historic monuments and past industry, landscapes, townscapes, and natural and ecological features. Therefore they will be impacted by a range of planning policies and cannot be treated as a single homogenous entity.

World Heritage UK welcomes the recognition given to the protection of World Heritage Sites in various places in the Draft Revised NPPF. Nevertheless it strongly advocates that such protection should be enshrined in primary planning legislation, and respectfully requests that this happens at the next suitable opportunity.

The views set out here are made on behalf of World Heritage UK, and are not necessarily those of any individual site, member organisation or individual member.

Chapter 1 – Introduction

Question 1 – Do you have any comments on the text of Chapter 1?

No comments

Chapter 2 – Achieving sustainable development

Question 2 – Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

Footnote 7 to the table at paragraph 11 sets out examples of policies that protect areas or assets of particular importance. World Heritage Sites should be added to this list.

Question 3 – Do you agree that the Core Principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

The list of Core Principles was helpful in highlighting in one place the key expectations of the planning system. It would be useful to retain such a list.

Question 4 – Do you have any other comments on the text of Chapter , including the approach to providing additional certainty for neighbourhood plans in some circumstances?

No comments

Chapter 3 – Plan-making

Question 5 – Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

No comments on proposed changes to tests of soundness.

Question 6 – Do you have any other comments to make on the text of Chapter 3?

Paragraphs 17, 18 and following. World Heritage UK strongly disagrees with the proposed changes to the nature of the development plan. The Revised Draft NPPF states that “as a minimum, authorities must ensure that there is a plan which addresses the strategic priorities for their area”. There would be no obligation on local authorities to produce more detailed policies in a Local Plan. This would leave as optional many of the policies in Local Plans that currently protect, preserve and help present World Heritage Sites. These policies include those that encourage good design, set out the type of development that is or is not acceptable at or adjacent to World Heritage Sites, protect Sites’ settings and promote conservation. It cannot be assumed that local authorities will voluntarily produce local plans. If they do not, this would severely weaken the effectiveness of the planning system in helping to deliver the State Party’s obligations on World Heritage Sites.

Chapter 4 – Decision-making

Question 7 – The Revised Draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

No comment.

Question 8 – would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

No comment.

Question 9 – what would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

No comment.

Question 6 – Do you have any comments on the text of Chapter 4?

Paragraphs 40 to 47: World Heritage UK welcomes the continuing support for pre-application engagement. It has encouraged its members to be more actively involved in decision-making processes and recognises the value of early dialogue.

Chapter 5 – Delivering a sufficient supply of homes

No comments on this chapter (questions 11 to 14).

Chapter 6 – Building a strong, competitive economy

Question 15 – Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

No comment.

Question 16 – Do you have any other comments on the text of Chapter 6?

It would be worth highlighting here or in Chapters 15 and/or 16 the economic value of World Heritage Sites both locally and nationally. For example, a 2016 study found that the Jurassic Coast's World Heritage Site designation was worth up to £111 million per year to the Dorset and East Devon economy and helps support up to 2000 jobs.

Chapter 7 – Ensuring the vitality of town centres

Question 17 – Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses.

No comment.

Question 18 - Do you have any other comments on the text of Chapter 7?

It would be worth highlighting the economic value of World Heritage Sites that constitute, embrace or relate to town centres, such as Bath and Liverpool.

Chapter 8 – Promoting healthy and safe communities

No comments on this chapter (questions 19 and 20)

Chapter 9 – Promoting sustainable transport

No comments on this chapter (questions 20 to 23)

Chapter 10 – Supporting high quality communications

No comments on this chapter (question 24)

Chapter 11 – Making effective use of land

Question 25 – Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

World Heritage UK would support the proposed approaches unless the resulting development threatened the Outstanding Universal Value of a World Heritage Site or its setting and/or buffer zone, all as interpreted by policies in the respective local plan or plans. Such an approach would respect the varied nature of Sites and their needs.

Question 26 – Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

Again World Heritage UK would generally support this approach unless the resulting development threatened the Outstanding Universal Value of a World Heritage Site or its setting and/or buffer zone, all as interpreted by policies in the respective local plan or plans.

Chapter 12 – Achieving well-designed places

Questions 28 and 29 – changes in policy and comments on the text of the chapter.

World Heritage UK strongly supports the encouragement of good design. New building design for development in World Heritage Sites, be it contemporary or otherwise, should be guided by the context. Contemporary design can be compatible and exciting if done correctly.

However World Heritage UK does not agree with the caveat to **paragraph 126c**, which suggests that increased densities could overrule local character and history, including the surrounding built environment and landscape setting. This is not acceptable where high-density development would threaten the Outstanding Universal Value of a World Heritage Site or its setting and/or buffer zone, all as interpreted by policies in the respective local plan or plans.

Chapter 13 – Protecting Green Belt land

Question 30 – Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are ‘not inappropriate’ in the Green Belt?

No comment.

Question 31 – Do you have any other comments on the text of Chapter 13?

Paragraphs 135 and 136: While World Heritage UK understands the need to make best use of urban land and to protect the Green Belt, it is important to understand that this policy approach can threaten the Outstanding Universal Value and/or setting/buffer zone of some World Heritage Sites by increasing development pressures within urban areas. This is a question of priorities, which the Revised Draft NPPF does not resolve. Thus development in Green Belts may be approved in “very special circumstances” while “Substantial harm or loss of ...World Heritage Sites should be wholly exceptional.” (paragraph 190). Given their worldwide importance, World Heritage Sites should take precedence over Green Belts. Therefore World Heritage UK submits that there may be circumstances where it would be appropriate to review Green Belt boundaries to relieve development pressures at or adjacent to World Heritage Sites.

Chapter 14 – Meeting the challenge of climate change, flooding and coastal change

No comments on this chapter (questions 32 and 33)

Chapter 15 – Conserving and enhancing the natural environment

Question 34 – do you agree with the approach of clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

No comment.

Question 35 – do you have any other comments on the text of Chapter 15?

World Heritage UK is seriously disappointed that this chapter does not recognise or set out policies for England's natural World Heritage Site (the Dorset and East Devon Coast) or any such sites that may be inscribed in the future. The existence of such sites is recognised only in Footnote 53 in Chapter 16, and then no indication is given as to whether the policies applicable to World Heritage Sites in that chapter apply to natural sites. Chapter 15 should recognise natural sites and be clear about whether or not the policies in Chapter 16 apply. World Heritage UK suggest that an additional paragraph between **paragraphs 168 and 169** be inserted to address these issues. It would be very happy to discuss any appropriate wording.

Paragraph 168c: improving public access to the undeveloped coast may not be desirable in all cases. Indeed where there are already or are projected to be high levels of visitors, it may be better to manage visitor numbers away from such areas. Otherwise the aim of maintaining the character of the undeveloped coast may be compromised.

Chapter 16 – Conserving and enhancing the historic environment

Question 36 – Do you have any comments on the text of Chapter 16?

Paragraph 182: World Heritage UK warmly welcomes the new reference in this paragraph to World Heritage Sites and their Outstanding Universal Value. The inclusion of this reference in the first Paragraph of Chapter 16 provides a clear signal in respect of the importance of World Heritage Site status.

For the reasons set out with regard to natural World Heritage Sites, it would be better if those Sites were recognized and addressed in that chapter. This would make footnote 53 superfluous.

Paragraphs 185 to 198: World Heritage UK strongly encourages the use of Heritage Impact Assessments to help local planning authorities determine development proposals. It recognises that the Planning Practice Guidance refers to such assessments, but it would be helpful if their use was underlined in the NPPF, particularly for any single development proposal or number of proposals that cumulatively would have the potential to impact a Site's Outstanding Universal Value and/or its setting/buffer zone.

Paragraphs 190 and 191: Some World Heritage UK members have asked for a definition of "wholly exceptional" and "substantial public benefits" and whether precedents had been set that would assist in the understanding and application of

these terms. World Heritage UK would be interested to learn how these paragraphs have been interpreted and whether precedents have been set. If not, it suggests that a review would be helpful in informing any changes of wording. Again it would be happy to discuss this issue.

World Heritage UK supports of the proposed retention of **Paragraph 196**, which requires local authorities to “look for opportunities for new development within World Heritage Sites...to enhance or better reveal their significance;” as well as the proposed retention of **Paragraph 197**, which recognises that not all elements of a World Heritage Site will necessarily contribute to its significance.”

Chapter 17 – Facilitating the sustainable use of minerals

Question 37 – do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text of the chapter?

Paragraph 145a: World Heritage UK welcomes the continued protection of World Heritage Sites through the provision of landbanks of non-energy minerals from outside these areas as far as is practical. However that protection should also be applied to areas that form part of the setting and /or the buffer zone of Sites, as interpreted by policies in the respective local plan or plans.

Paragraphs 204 to 206: The text addressing the issues on oil, gas and coal exploration and extraction is very weak in relation to heritage issues. In this respect, World Heritage UK advocates a similar approach as for non-energy minerals, including the suggestions above.

Question 38 – Do you think that planning policy for minerals would be better contained in a separate document?

No – it is very important that all national planning issues are addressed in a single document to ensure a consistent approach across all policy areas and identify and resolve any conflicts of policy approach.

Question 39 – Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

No comment

Transitional arrangements and consequential changes

No comments on questions 40, 41 and 42

Glossary

Question 43 – Do you have any comments on the glossary?

The glossary should include “World Heritage Site”

Don Gobbett,
Board Member,
World Heritage UK

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