

MHCLG CONSULTATION ON THE REVISION OF THE NATIONAL PLANNING POLICY FRAMEWORK

CHESTER ARCHAEOLOGICAL SOCIETY COMMENTS

Chapter 3 – Planning for the homes we need

Paras 9 and 25 - Cross-boundary strategic planning

Cooperation between local authorities is essential. It is unfortunate that the scope of these proposals is limited to England, as the Welsh border lies only 2km from the centre of Chester and runs through an edge-of-town industrial estate; we imagine that analogous situations exist elsewhere. Strategic planning is impossible without the cooperation of the relevant English and Welsh authorities.

Question 5 and Para 12 - Focus of design codes

We agree that the focus should be on localised design codes and masterplans rather than district-wide ones. This may allow an increase in densities in some areas, but it needs to be emphasised that all design codes should take account of the character of the immediate locality, as set out in the *National Design Guide* and *National Model Design Code*.

Chapter 5 – Brownfield, grey belt and the green belt

It needs to be emphasised that all developments – whether on brownfield, grey belt or green belt sites – need to contribute to the extension or creation of spatially coherent, sustainable communities as characterised in NPPF Chapter 8, rather than occur on isolated ‘windfall’ sites; local authorities need to have sufficient staff with adequate skills to achieve the necessary masterplanning and the power to resist attempts by developers to build wherever they wish. See also Question 21.

Question 20 – ‘Brownfield passports’

Even within settlements, some brownfield sites may be more properly used to give people access to local green space (subject to any necessary decontamination).

Brownfield sites have by definition seen previous occupation, which may be of archaeological importance, and even where such remains have been recorded in the course of previous development there may be unrecognised complexity and the degree of survival may vary considerably over a small distance. Any ‘brownfield passports’ therefore need to be informed by adequate knowledge of the survival, character and significance of the archaeological resource and should protect it appropriately, eg by indicating the likely general constraints on groundworks associated with new development. Where this level of information does not exist, evaluation (trial excavation) may be necessary. Even so, when considering individual buildings, further evaluation may well be required to permit mitigation through modifications to groundworks, followed by an archaeological programme where necessary. Local authority archaeological officers will need to be resourced appropriately.

Green belt - General

Green belt land must be expected to contain archaeological sites and landscapes. However, existing knowledge may do little more than hint at their existence, and their character and significance may often be largely unknown without excavation or other targeted investigation. The problem of site recognition is particularly acute across much of rural lowland north-west England, where archaeology is often not easily visible on the surface, eg through aerial photos, finds discovered through fieldwalking or metal-detecting, because of the nature of the terrain and the long-term history of the region. Any proposals for the release of such land for

development therefore need to be informed by prior appraisal and investigation to identify archaeological potential and to characterise sites sufficiently for constraints to be set out.

Question 21 – Previously developed land in the green belt

We suspect that some previously developed land in the green belt will not be of sufficient size or contribute to spatially coherent communities so as to justify development and would be better being rewilded or returned to agriculture (subject to any necessary decontamination).

However, here we should like to draw attention to the extravagant use of land for surface car parks, especially those attached to supermarkets, retail parks and business parks on the edges of towns, whether in the green belt or not, which should be considered for development where alternative access by public transport can be provided.

Questions 23-27 – Grey belt

Among the criteria for defining grey belt land should be that it does not include land that is better suited to providing local green space for nearby residents. Built-up land that already detracts from the separation of neighbouring towns or the setting and character of historic towns should not see further development.

Chapter 6 – Delivering affordable, well-designed homes and places

Question 59 – Removal of the word ‘Beauty’

In our experience, all too often developments are permitted that are recognised to be substandard in design terms and sometimes do harm to conservation areas. Anecdotally, people may expect schemes that are otherwise welcome to look ‘ugly’. Again, in our experience government planning inspectors have supported developers’ appeals even when their proposals clearly contravene local design policies and guidance, and local authorities may themselves may pursue schemes that contravene their own policies. It should be considered whether such experiences are partly responsible for nimbyism.

The assertion that beauty is subjective is made to counter even reasoned, specific objections to such proposals. However, research by the Create Streets Foundation suggests that perceptions of ‘beauty’, if not objective, are at least widely shared and predictable, and that its attainment is thus routinely achievable. There is therefore no reason why the word ‘beauty’ should not be retained in NPPF, if it is defined when first used. Some of the thinking from Create Streets is incorporated in the *National Model Design Code* and especially the *National Design Guide*, and the need to comply with these principles, including in ‘boxland’ (edge-of-town retail parks consisting of metal sheds), cannot be repeated too often.

It is important that local authorities should take the initiative in devising local design codes and deciding how the provisions of the *National Design Guide* should be applied in a particular area, and agreeing these with residents. If the initiative is left to developers, the results will be sub-optimal as benefits will be negotiated away from the start. These parameters should be prepared not just for large new developments on previously developed land, grey belt and green belt, but also for small infill sites, especially in or adjacent to conservation areas. Such guidance should be visual and unambiguous, so that it is immediately obvious if proposals fail to comply.

The only design expertise in a local authority may lie with conservation officers, whose advice may be overridden by planning officers. Experienced design officers with greater authority should be appointed. The role of government planning inspectors also needs to be

reviewed; it should be to uphold plans and standards, not give succour to developers. Likewise, the ability of local authorities to approve developments in which they have an interest needs to be reconsidered.

Question 60 - Upward extensions

Upward extensions are acceptable, and may even improve the appearance of some buildings, but they should respect the character of the neighbourhood as well as that of the buildings in question. Again, local design codes are needed, especially in conservation areas.

Chapter 7 – Building infrastructure to grow the economy

General

The construction of large-scale infrastructure is likely to have a corresponding archaeological impact. Our experience with the abortive leg of HS2 north of Birmingham was that the consultants engaged did not understand the very varied visibility, character and significance of archaeology across the country; efforts should be made to engage local/regional expertise, especially that of county archaeological officers.

Chapter 8 – Delivering community needs

Questions 67-8 – Public infrastructure

We strongly agree. However, the challenge for planners and architects is not just to build specific facilities but to create joined-up attractive town or local centres with a 'sense of arrival', to which all of NPPF Chapter 8 paras 94-100 are relevant, rather than just functional but disjointed, amorphous seas of houses, retail parks and public infrastructure. Individual heritage assets or conservation areas can give a sense of identity or even help to shape such places.

Question 69 – A 'vision-led' approach to transport planning

We strongly support this approach, but it needs to be applied to existing settlements, not just to new developments. Ever-increasing infrastructure for motor traffic threatens the 'walkability' of settlements and the character of historic centres (and has been tearing them apart since the 1960s). In fact, historic centres built before the motor age may offer a model for more accessible places designed for people. Local plans should include the creation of a comprehensive network of safe, direct and attractive cycling routes 'from anywhere to everywhere', the 're-stitching' of communities, and the return of land given over to such roads, car parks etc to better uses. Experience in the Netherlands of the creation of cycleways suggests that full implementation is likely to take decades; funding arrangements need to be appropriate to such a timescale and local authorities need to be emboldened to take the necessary action, which will inevitably provoke opposition

Question 70 – Promoting healthy communities

Part of the answer lies in more attractive, walkable places, as advocated in our answer to Question 69.

For all of chapter 8 we need visual, detailed spatial masterplanning,

Chapter 9 – Supporting green energy and the environment

Question 74 – Protection of habitats

Renewable energy developments in the countryside, even nominally 'temporary' solar panel arrays, can threaten not only the 'natural' (ie biocultural) environment' (as well as views) but also the historic environment in the form of shallow archaeological remains and earthworks.

However, in contrast to the 'natural' environment, which can sometimes be restored, the historic environment cannot: 'once it's gone, it's gone forever'. We therefore support the argument that local authorities proactively identify sites for such development to minimise these threats. This will have staffing implications.

Rural solar panel arrays, albeit arguably necessary, are not only unsightly but can waste agricultural land. The installation of solar panels on roofs should therefore be strongly encouraged for existing buildings and should become the norm for new ones.

Question 78-81 – Tackling climate change

Chapter 16 of the NPPF on the historic environment should include a presumption in favour of the adaptive reuse of locally listed buildings, in the context of a greater focus overall on the refurbishment of existing buildings rather than their demolition; see this from the Council for British Archaeology: [Achieving a Sustainable Built Environment](#). This should increase the supply of attractive housing, whether to buy or let. There should also be a statement on the potential of historic centres, conservation areas and community spaces to contribute to the creation of more 'walkable' and attractive places; see Questions 67-70 above.

Street trees should be planted and small green urban spaces created in appropriate places.

Woodland (re-)creation should be pursued in appropriate places. However, as with the use of land for green energy, it can be highly destructive of archaeology, both through the initial disturbance of the soil for planting and through subsequent root action. Suitable areas for woodland creation and vulnerable areas of archaeology should therefore be identified in advance.

Question 83 - Availability of agricultural land for food production

The coming years could see changes in farming practices, eg a shift from meat to plant production, with corresponding changes in land use. These could threaten archaeological remains preserved in pasture land, eg medieval ridge and furrow ploughing. A strategic approach is needed to minimise this threat.

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