



Chartered  
Institute of  
Environmental  
Health

# Review of Planning Practice Guidance

Response to Department for Communities and Local  
Government consultation

February 2013

Sangeeta Sofat  
Review of Planning Practice Guidance  
Dept for Communities and Local Government  
1/J1 Eland House  
Bressenden Place  
London  
SW1E 5DU

By e-mail: [planning.guidance@communities.gsi.gov.uk](mailto:planning.guidance@communities.gsi.gov.uk)

Dear Ms Sofat

## Review of Planning Practice Guidance

I refer to the Department's consultation paper of the above name published on 21 December and the comments of the Chartered Institute follow.

By way of beginning, we cannot help noting that nearly 11 months have already passed since publication of the NPPF. Confusion among users of Planning Policy Guidance and Planning Policy Notes about their status has been palpable since and a more coherent process might have seen the results of this review published at the same time.

Resolving questions about the scope and form of future guidance now is, therefore, urgent. That said, we regret that this review, once begun, did not take a little more time to encourage participation; that by way of the 'roundtables' listed on p.13 of the report was by definition selective, while even the criteria behind the recommendations are unclear.

Notwithstanding, we agree that the suites of supporting documents extant on publication of the NPPF had grown too large. All well-intentioned, more is not necessarily better, however, and in the range of kinds of guidance, their different purposes and different status, they had become confusing and beyond the capacity of the Department to keep updated.

The report makes the point that better regulation would reduce the need for explanatory material subsequently. We agree. It is also true that less piecemeal production might reduce the need to preface each bit with repetitive contextual material.

We are, nonetheless, clear, despite our offers of assistance, that it is government's responsibility to provide adequate explanation of its planning policies; only government can control the quality of that or lend it the necessary authority but at the same time, whereas brevity may be a virtue, that guidance must say what it needs to say without dogmatic constraints. Guidance which is artificially short will not meet its audiences' needs with the results that uncertainty and inconsistency in application will continue to no-one's benefit. Inadequate guidance will also only encourage the production of supplementary material.

Turning to matters of detail, overall, we agree with the recommendations of the Review Group. With the proviso that 'essential' should not be construed too narrowly and that recommended standards have a place, we could not argue that it should not be clear, up-to-date, coherent and accessible, or that the Department should not be responsible for that.

Hosting it on a single dedicated website (as 'The' place to go for planning guidance) would facilitate both maintenance and accessibility and linking material to the NPPF is a good idea but we caution again against cutting it to the bone. It would be only good practice to notify

stakeholders of additions to the collection by e-mail alert; many websites offer such a service for free and we would oppose charging any in this case.

We have to sound a strong note of reservation about the proposed timetable; while there is no case for prolonging the life of clearly obsolete material, aiming for the first anniversary of the publication of the NPPF purely for the symbolism of that would be a mistake. Of more concern, however, is the aim to complete the great majority of the work to transform those elements of current guidance which will be retained by July; that is unlikely to be as easy to do as it sounds but it is important for the guidance in question and for the project as a whole that it is done well. We doubt too that, once on-line, it will be as easy to amend as recommendation 13 suggests and it would be better that it be properly consulted-upon and not be rushed in the first place.

Turning to specifics, we note the recommendation in Annex D for new guidance in the area of environmental quality, covering all three natural media plus noise and artificial light. Since these include areas on which we have said we, in partnership with other relevant professional bodies, would provide guidance if government did not, we welcome the recommendation and the report's recognition of those issues as 'important' matters for the planning system which, of course, they are. As we have also said, if government does not accept this recommendation, we fear the emergence of competing and perhaps contradictory guidance from unofficial sources which would not be helpful.

We welcome particularly the recognition that these are areas in which the government could, perhaps exceptionally among planning guidance, set standards and we have in mind such as those linked to the Noise Exposure Categories of PPG24 where, notwithstanding 'localism', inconsistency between local planning authorities would make no sense and, in fact, tend to impede development.

It is not clear to us, nevertheless, whether the proposal is for a single document or for several and though there is some logic in treating the environment as a whole our strong advice would be that there are sufficient differences in the planning context for individual treatment of the topics. In any event, we would repeat that guidance on environmental topics should not be arbitrarily limited to 2-3 pages; if it is not to be labelled as tokenism, and face some of the same criticism the NPPF has done, it must cover the necessary ground however wide that is.

The government's response to the consultation on the draft NPPF signalled a role for professional bodies in producing future guidance and, as such a body, the CIEH stands willing to help the Department to do that.

I hope these comments assist.

Yours faithfully

Howard Price  
Principal Policy Officer

# The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish guidance notes and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,000 members .