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[online submission option available at: <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

and documentation on the National Planning Policy Framework on the same site.

Please note: online submission option could mean attempting to answer 106 questions. You may wish to make your own comments instead, as I have done below]

September 2024

**SUBMISSION TO CONSULTATION ON NATIONAL PLANNING POLICY FRAMEWORK NPPF)**

**INTRODUCTION**

The Government is consulting about amendments to the National Planning Policy Framework which they believe will speed the planning process. How this will occur without stopping land-banking, and deliberate delays in construction by developers who wish to wait until prices rise – or don’t actually have access to the construction workforce to complete development more quickly – is unknown. Consequently, we are free to conclude the Government is intent on propaganda about its wish to give the impression that more homes will be built. But the NPPF itself is riddled with problems:

Many of the basic assumptions in the current National Planning Policy Framework(NPPF) are highly questionable and not suitable for meeting sustainable development criteria of any credible character. Discussion in the early period of the NPPF’s existence demonstrated basic problems with the NPPF, including no effective operational definition of sustainable development; economic sustainability overriding social and environmental concerns; a ‘developer’s charter’ character to the effects of the NPPF; clear evidence that the vagueness of the NPPF was inferior in practice to about 1000 pages of planning policy it notionally ‘replaced’; no objective source of land value calculations in general use, giving scope to developer opinion; no constraint on land-banking where permission to build housing has been given but no development takes place for years, during which house prices often continue to rise – advantaging the developer but not those in need of housing; basic weaknesses on water, climate change, biodiversity and renewable energy; weaknesses in Appeals system where local government has difficulty funding appeals against proposals that are clearly deficient in some respects; Local Plans which were becoming too developer-friendly; unreliable or misleading Strategic Market Housing Assessments; too many homes left empty on one or other pretext.[[1]](#footnote-1) Many of these problems remain intact and require that the NPPF be abandoned in favour of legislation which supports far more community-based decision making and allows local authorities to reject more applications, and make use of a very strict application of a comprehensive definition of sustainable development. Building standards remain far too low. Modular construction should be the norm imposed to stop new build from being so expensive.

Broadly, the planning system does not appear to address the fundamental and urgent challenges of the Climate and ecological emergencies. Consequently, social and long-term needs of communities are not considered as paramount. It is not difficult to look into the work of the organisations of the British Green Movement of NGOs/green parties of the UK and see concerns and campaigns which are about the very many failures of local, regional and national planning. Consequently, Government reforms which will allegedly speed up existing forms of planning are actually just more bad planning and market failures for the future.[[2]](#footnote-2) These concerns need to examined in the context of the NPPF which needs abolition and replacement in line with a number of principles:

* Long-term ecologically and socially sustainable development
* Primary emphasis in housing policy upon acquiring more council and keyworker shared ownership homes from the existing built environment with no targets for market homes. This should include ending Right to Buy in England.
* The creation of a circular economy[[3]](#footnote-3) in which physical resources as far as practically possible are re-used and waste is minimised with a long-term zero target
* An end to the assumption that planning exists primarily to facilitate development: it should often be about simply saying ‘No.’
* A barrier to greenfield site development in general
* Sustainable regeneration, meaning for example: the use of the existing built environment for homes, and of surface car parks for apartments above surface level, and re-envisioning our cities as locations for urban forests as far as possible.[[4]](#footnote-4)
* To ensure downward pressure on the total number of vehicle journeys, especially by cars, and of all possible developments that may generate more traffic, more flights or more shipping – in order to reduce GHG emissions and other pollutants from the entire transport sector

Examples of objections from a variety of organisations to the fundamentals of the NPPF and not accommodating to the ‘lazy developer’ ambition to build on greenfield sites, include:

The Town and Country Planning Association:

“..given the urgency of both the climate and health crises, the TCPA thinks that the proposed changes to the NPPF are inadequate and will not result in the climate-resilient places and healthy populations that the government has committed to achieve.”[[5]](#footnote-5)

Campaign for Protection of Rural England (Herts) notes that the Government is willing to intervene to take over local authority’s plan making if it feels necessary. But centralisation of decision-making alienates people from political processes and rebuilding local government finance, and tax setting powers specifically, are needed. Replacing, after revaluation, council tax and business rates with Land Value Taxation is desirable as is the restoration of the Revenue Support Grant for areas which need it. And, commenting on amendments to the NPPF, they say:

“There is an emphasis on the provision of public services and infrastructure but it is not clear how it is to be provided.”

CPRE Herts. also notes problems with achieving 50% ‘affordable housing’ and the use and misuses of ‘viability’ to reduce the proportion of allegedly affordable housing actually delivered. This overall failure in the planning process clearly permits too much flexibility to developers who need to be controlled and directed to meeting actual housing demand, especially from lower income groups. Certainly, this should be about regeneration and using the empty built environment not the Green Belt or rather nebulous ‘grey belt.’[[6]](#footnote-6)

The NPPF includes the idea that the purpose of the planning system is to achieve sustainable development. However, there are no planning regulations or pieces of legislation which make new development sustainable in terms of energy use such as compelling the use of solar PV, or ensure re-use of water within buildings from sinks, baths and hand-basins for toilet flushing. Space standards have been eroded such that much existing development is meanly sized despite the numbers of people being housed or working in some cramped spaces. Space standards have yet to recognise that remote working and more flexitime mean new homes need to be far more spacious than at present, as a requirement in law. This means section 7 p.5 of the NPPF on achieving sustainable development is fictional.

No one in need of housing needs high house prices or high rents. These are market failures a State and local government led re-use of the empty built environment, and of spaces above car parks, needs to address by providing more council homes and keyworker shared ownership housing. We need targets for such goals and no targets for market housing. Private landlords wanting homes for private rent is not a housing demand. This is market pressure for the creation of high rent properties and should be resisted. Given the condition of many rental properties, compulsory purchase for sustainable retrofitting and use as council or keyworker homes seems best to meet local area needs over time.

The overriding principle of economic development should be actual sustainability which means land needs to be used by re-purposing existing sites, using brownfield and increasing density of use of employment land - and of housing by raising heights of new structures.

Sustainable communities need: minimal traffic movements and vehicle parking spaces to reduce traffic pollution (including non-exhaust emissions); larger spaces per person in homes; retention of green space and biodiversity and expansion where possible to help improve air quality, reduce noise and promote walking particularly; key local services within walking and cycling distance in line with 15-minute city/30-minute territories ideas.[[7]](#footnote-7)

To make progress in line with the principles above, overriding the limitations of the NPPF, requires that more of the taxation raised in society is used at local government level instead of:

* Paying 8 times more for rail and road infrastructure than the average for other countries in Europe
* Building trunk roads
* Expanding airports rather than making smaller ones ‘flight-free’ and usable for other forms of employment
* Failing to fund education, adult social care or housing sufficiently

**QUESTIONS IN THIS CONSULTATION**

Given the huge number of questions in this consultation, only a few have been responded to in this submission:

Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Answer: As a rule, large new communities are likely to suffer from continuing problems of infrastructure supply with only excesses of road-building and car parking likely to occur. Regeneration of existing urban settlements should be prioritising use of the empty built environment, building above car parks, and increasing the density of use in industrial estates and science parks to allow housing to be added. Large new communities, sometimes dumped on greenfield sites with remarkably little community infrastructure, should not be a planning goal.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Answer: No. Local planning authorities should have targets for council and keyworker housing according to actual demand, with no targets for market housing. If sites exist within a settlement that may be zoned for self-build private homes, this should be in very small numbers as part of larger sites e.g. as apartments above car parks. Such properties should be subject to the same covenants as other residents in the same development and no such properties may be privately-rented on high cost grounds.

Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Answer: Local authorities and unitaries should not have to absorb growth from neighbouring areas. Additional homes may be part of regeneration strategies needed for poorer local authority areas where expansion of reliable long-term employment in the public sector is creating an ‘uptick’ in local housing demand. Strategic planning should be under democratic control at a regional level e.g. when there are elected regional assemblies with specified powers and resources, and after County Councils are abolished in favour of unitaries. In short, our political system is much too centralised.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Answer: affordability should be given an entirely new meaning. The objective should be to reduce the average cost to a household of housing - in a given local authority area - as a percentage of average household income. This should be done over a 15-year period of reducing market housing both new private rental and new private ownership, in order to allow people greater discretion with the use of their household financial resources. Factors like long-term issues with higher food prices and the need to renew the physical infrastructure of key services like hospitals and schools, and to devote more resources to dealing with the Climate and ecological emergencies means households need help by reducing housing costs to meet other needs, possible changes to taxation and resources for crises like Covid and adaptation to Climate Change.

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

Answer: ‘Grey Belt’ should as a term identify areas of Green Belt for nature restoration, with new designations of protected landscapes for the future including areas zoned for rewilding, reforestation and the selective conversion of the existing built environment to include more council and keyworker homes.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful?

Answer. No. Extending the Green Belts and protected areas should be a goal for local authorities wherever practically possible.

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

ANSWER: Not much use without an expanded, refunded and re-empowered Environment Agency to orchestrate such Strategies, share best practice, ensure allocation of needed human and other resources etc.

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making?

ANSWER: No.

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1. See: <https://committees.parliament.uk/writtenevidence/54065/html/> [↑](#footnote-ref-1)
2. This is an ideological problem of what appears to be wilful naivety about the efficacy of market organisations in the planning process. See for an assessment of this type of problem: Edward Shepherd (2021) – *Ideology and institutional change: the case of the English National Planning Policy Framework -* <https://www.tandfonline.com/doi/full/10.1080/14649357.2021.1942528#abstract> [↑](#footnote-ref-2)
3. See: Kate Raworth – Doughnut Economics, 2017 [↑](#footnote-ref-3)
4. See: <https://www.nature.org/en-us/what-we-do/our-priorities/build-healthy-cities/cities-stories/benefits-of-trees-forests/> [↑](#footnote-ref-4)
5. <https://www.tcpa.org.uk/resources/nppf-consultation-initial-response-2024/> [↑](#footnote-ref-5)
6. <https://www.cpreherts.org.uk/news/briefing-note-national-planning-policy-framework-public-consultation/> [↑](#footnote-ref-6)
7. See: Natalie Whittle – (2021) - The 15 Minute City: global change through local living & Ezio Manzini (with Ivana Pais) – (2022) – Liveable Proximity: ideas for the City that cares & Carlos Moreno – (2024) – The 15-minute City: a solution to saving our time and our planet & Thalia Verkade and Marco te Brommelstroet – (2022) Movement: how to take back our streets and transform our lives. [↑](#footnote-ref-7)