

A new National Planning Policy Framework for
consultation July 2024

*Will changes to the planning system steer us away
from car-based sprawl and facilitate access to
new homes by sustainable transport?*

Some of the problems that we have identified in the past

1. **Little coordination (if any) between local public transport investment and location of new-build**
2. **High housing targets for rural and semi rural local authorities** where public transport is extremely limited.
3. **Dispersed model of development.** High carbon spatial model of development: increased traffic and travel by road ; counter urbanization
4. **New development in conjunction with road building** bypasses, large distributor roads and bigger motorway junctions
5. **Building far from jobs and services** – more driving, need to drive
6. **Limited cross boundary working in Local Plans outside major urban areas** – the map over the border is greyed out; the Local Authority ‘island’ idea.

7. **Developer-led locations** with selection mainly on 'deliverability'; greenfield favoured
8. **Upside down geography – not 'vision and decide' but mitigation of environmental and transport** at outline planning application - more road capacity
9. **Concept of 'self-sufficient' communities around walking and cycling hard to achieve** without places to walk to and a migration of services and employment out of town
10. **Low density car-based sprawl** rather than high density urban quarters, apartments
11. **Limited choice for those who don't drive** or who want a life style that is built around excellent public transport access

- 12. Transport Assessments** too much based around widening junctions to enable more traffic
- 13. Travel Plans** impossible in so many places because of the lack of public transport and places to walk to
- 14. Parking space dominates** because car-based housing; impacts on public realm, greenery, good urban design
- 15. Developers scrutinise their own large-scale housing impacts:** environmental assessment, and may enter into Planning Partnership Agreements, even paying for the officer
- 16. Viability clause in NPPF:** limits spend on affordable housing, infrastructure/services

So does the latest consultation on the NPPF and other plans put forward by the new government improve things?

July 2024 consultation: salient points from Planning Resource

- **Make the standard method for assessing housing needs mandatory**, requiring local authorities to plan for the resulting housing need figure,
- **Implement a new standard method and calculation** to ensure local plans are ambitious enough to support the Government's manifesto commitment of 1.5 million new homes in this Parliament;
- **Re-calculate housing targets** (spreadsheet already issued)
- **Reverse other changes to the NPPF made in December 2023** (note: this relates to the five year housing land supply)

Brownfield sites, Green Belt and Grey Belt

- **Broaden the existing definition of brownfield land**, set a strengthened expectation that applications on brownfield land will be approved and that plans should promote an uplift in density in urban areas;
- **Identify grey belt land within the Green Belt**, to be brought forward into the planning system through both plan and decision-making to meet development needs;
- **Improve the operation of ‘the presumption’ in favour of sustainable development**, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies

Affordable homes and community

- **Deliver affordable, well-designed homes**, with new “golden rules” for land released in the Green Belt to ensure it delivers in the public interest;
- **Changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need** on all housing development and that the planning system supports a more diverse housebuilding sector;
- **Deliver community needs to support society.....**the right infrastructure for new housing developments

And on environment

- Steve Reed wrote a [joint letter](#) to environmental groups, referring to the Planning and Infrastructure Bill and its aim to “transform” the planning and environmental assessment system.
- In the letter, published on 21 July,: *“Nature recovery remains a top priority alongside the need to overhaul the planning system, grow the economy, and reach net zero.”*
- *“Environmental assessments and case-by-case negotiations of mitigation and compensation measures often slow down the delivery of much needed housing and infrastructure”.*
- *“Meanwhile, the condition of our environment, and even our most important habitats and species, has declined over a sustained period. This is a lose-lose situation, for our economy, the public and for the natural environment.”*

Much remains unclear and detail is lacking – the only real change so far documented in detail appear to be the housing targets.

The following maps give some idea. They show the new housing targets for different local authorities from Lichfields, these being the main ‘cog’ in devising a Local Plan.

Housing Targets (per 1,000 homes)

Proposed standard method (per 1,000)

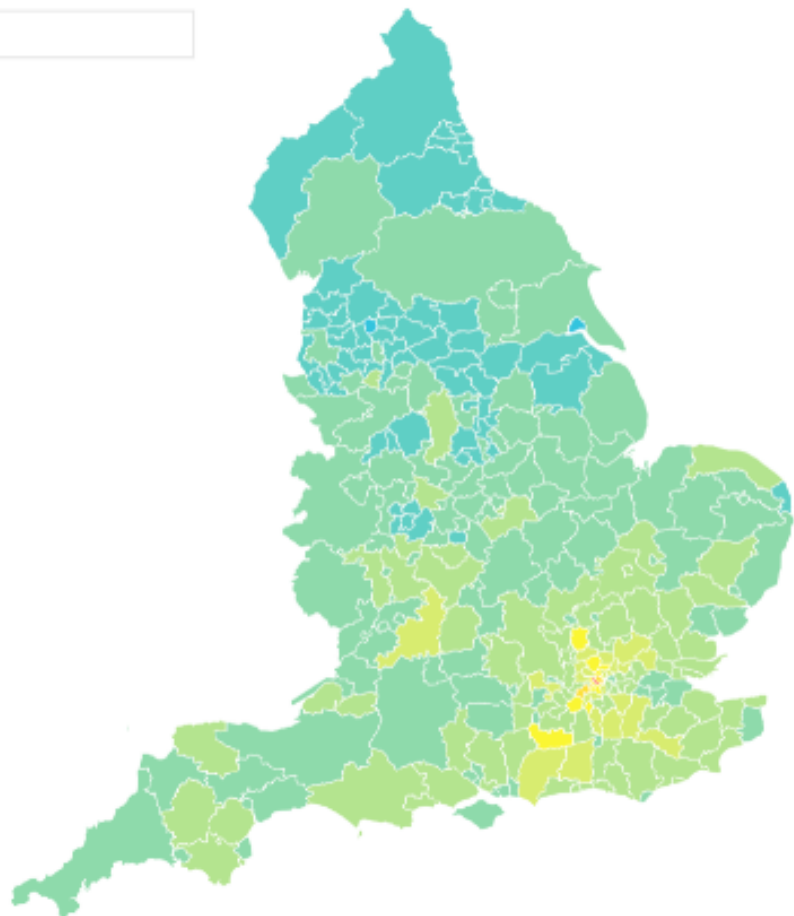
Current standard method (per 1,000)

Current Local Plan (per 1,000)

Average delivery (per 1,000)



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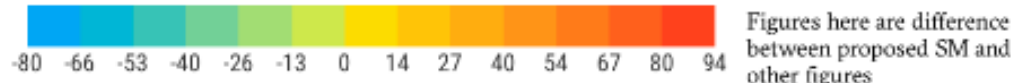


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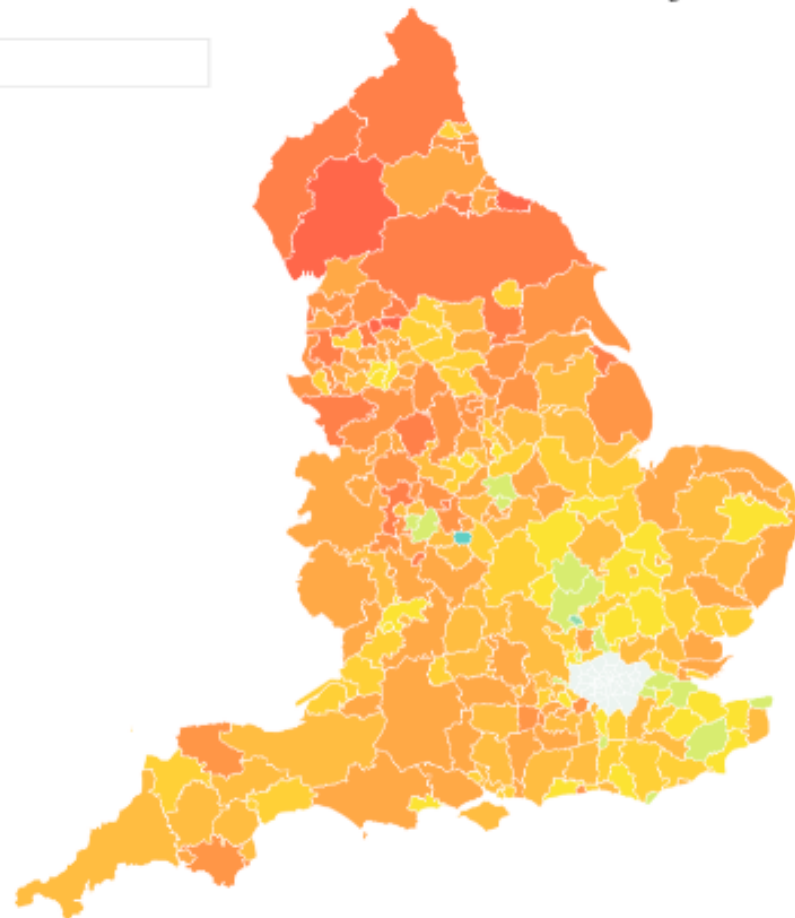
From current method (%)

From current Local Plan (%)

From average delivery (%)



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So what are the next steps?

It seems that although the government would agree with us about public transport provision for new development and the creation of local walkable communities, there are real problems with the 'new' NPPF which was rushed out too quickly.

Perhaps we need to explain some of the pitfalls of not doing planning properly, cross ministry. And the need in particular for modern local public transport networks to cement new areas together. Over to you!

- Little coordination between local public transport investment and planning
- Housing targets high for rural areas
- House-building in combination with major road building
- Dispersed model of development
- Building far from jobs and services
- Limited cross-boundary or sub-regional working

Developer-led locations
Not 'vision and decide' but developer-led site selection
Places without community facilities and services
Low density car-based sprawl for Greenfield sites
Limited choice of new housing for those that don't drive

Transport Assessment too much about highways
Travel Plans can't work in wrong location
Parking and effect on public realm and travel
Developers scrutinise own developments due to lack of LA resource
Viability clause used to reduce affordable/social homes and infrastructure