

REPORT TO SHEVINGTON PARISH COUNCIL POLICY AND GENERAL PURPOSES COMMITTEE-APRIL 5TH 2018.

CONSULTATION ON THE DRAFT REVISED NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The NPPF sets the national framework for the production of plans and decisions made by local authorities. This consultation ends on 18th April 2018.

Members will be familiar with some of the suggested changes to NPPF as they appeared in a report to Policy and General Purposes Committee on March 2nd last year on the Housing White Paper. Here are some of the elements of the current consultation.

Achieving sustainable development

A small but significant change to the presumption in favour of sustainable development is proposed. The current Framework includes examples of policies, which provide a specific reason for restricting development. This is replaced by a list:-

1. Sites protected under the Birds and Habitats Directives .
2. Sites designated as Sites of Special Scientific Interest.
3. Land designated as Green Belt.
4. Land designated as Local Green Space.
5. Land designated as an Area of Outstanding Natural Beauty.
6. Land within a National Park (or the Broads Authority).
7. Land defined as Heritage Coast.
8. Irreplaceable habitats including ancient woodland; aged or veteran trees.
9. Designated heritage assets (and other heritage assets of archaeological interest.
10. Areas at risk of flooding or coastal change.

The accompanying note to the consultation states that this approach does not preclude other policies being used to limit development where the presumption applies, if the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.

Plan making

Proposed are a number of changes to plan making policy. The key areas include emphasising the need to enable authorities to pursue the most appropriate strategy to meet strategic priorities, amending tests of soundness and encouraging better use of digital tools in consultation.

Decision taking(viability).

Proposals outlined in the consultation “Right Homes in the Right Places” have been brought forward in this consultation, suggesting that viability assessments should not be required where a proposal meets development plan expectations. However, perhaps more significantly is the proposal that viability assessments should use standardised methods and be made publicly available.

Delivering a sufficient supply of houses

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This new section brings forward a number of initiatives.

It references a standard methodology for assessing house numbers set out in planning practice guidance. The methodology is designed to be simpler than currently exists, which will help remove long protracted delays at inquiries and speed up the plan making process, which needs to happen in order to bring certainty to the market in the shorter term.

However simplified housing demand-led targets will exacerbate existing trends, putting more emphasis on where demand is already high and striking a blow to areas that have growth ambition but currently lack market stimulus to meet it. The planning system must ensure that places which now have lower targets do not have their growth and place-making ambitions stifled. This should be accompanied by a recognition that more needs to be done at a national level to tie together budgetary decisions with infrastructure aspirations as well as support for public intervention in the housing market.

The earlier guidance on the Housing Delivery Test outlined a tapered approach to measuring housing delivery against local plan targets over 5 years. This consultation maintains that local authorities should have an additional buffer of site allocations depending on delivery circumstances (up to 20%). As an additional requirement this revised guidance would require authorities who are delivering under 95% against their targets to produce an action plan as to how to tackle under-delivery.

The definition of Affordable Housing has been widened to include starter homes and now expects a minimum of 10% for affordable home ownership across the board (not specifically starter homes).

Promoting healthy and sustainable communities

This accepts the role that planning can play in supporting social interaction and healthy lifestyles.

Promoting sustainable transport.

This version of guidance shows that planning policies should support an appropriate mix of uses across an area, and within strategic sites, to minimise the number of and length of journeys needed for employment, shopping, leisure, education and other activities as well as a tightening of policy to link sustainable transport with opportunities to increase densification.

Making effective use of land

Previous proposals to promote higher density developments around commuter hubs are carried forward in this guidance. It also places emphasis on brownfield development within existing settlements. Further weight should be given to the land's location relative to public transport, employment and community facilities.

Achieving well-designed places.

The policy is now more specific as to how good design should be achieved by use of design codes and specific standards such as "Building for Life"

Green Belt

The guidance is clear in its intention to protect the Green Belt. It continues an

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exception for affordable housing on brownfield sites within the Green Belt. Such sites should also be located in terms of access to public transport, employment and community facilities.

Questions*(Comments in italics)*

Chapter 1 Introduction.

Q1 Do you have any comments on the text of Chapter 1? -*No*

Chapter 2 Achieving sustainable development.

Q2 Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development? -*No comments*

Q3 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? -*Yes*

Q4 Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances? *The setting out of a defined list of policies which could lead to a refusal of development is welcomed.*

Chapter 3 Plan making.

Q5 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? *Yes encourages consistency.*

Q6 Do you have any other comments on the text of Chapter 3? *No*

Chapter 4 Decision taking(viability)

Q7 The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic? -*No should be available to all interested parties.*

Q8 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? *Yes*

Q9 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*

Q10 Do you have any comments on the text of Chapter 4? *No*

Chapter 5 Delivering a wide choice of high quality homes.

Q11 What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites? *No comment.*

Q12 Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020? *No*

Q13 Do you agree with the new policy on exception sites for entry-level homes? *No*

Q14 Do you have any other comments on the text of Chapter 5? *The suggested demand led calculation may lead to exacerbate existing trends putting pressure on*

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areas where demand is already high and stifling development in less favoured areas. Paragraph 62 requires the need to identify the size type and tenure of homes needed. It is particularly important to provide homes for elderly people(including sheltered accommodation)as this will release larger family homes onto the market.

Chapter 6 Delivering a strong competitive economy.

Q15 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*

Q16 Do you have any other comments on the text of chapter 6?*No*

Chapter 7 Ensuring the vitality of town centres

Q17 Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses? *Yes*

Q18 Do you have any other comments on the text of Chapter 7? *No*

Chapter 8 Promoting healthy and safe communities

Q19 Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

Q20 Do you have any other comments the text of Chapter 8?

Chapter 9 Promoting sustainable transport.

Q21 Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts? *Yes*

Q22 Do you agree with the policy change that recognises the importance of general aviation facilities? *No comment.*

Q23 Do you have any other comments on the text of Chapter 9? *No*

Chapter 10 Supporting high quality communications.

Q24 Do you have any comments on the text of Chapter 10? *No*

Chapter 11 Making effective use of land.

Q25 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?

Emphasis needs to given to land having good public transport access to employment and community facilities.

Q26 Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs? *No*

Q27 Do you have any other comments on the text of Chapter 11? *No*

Chapter 12 Achieving well-designed places.

Q28 Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on? *No.*

Q29 Do you have any other comments on the text of Chapter 12? *No*

Chapter 13 Protecting the Green Belt

Q30 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? *Such land should be have good public*

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transport access to employment and community facilities.

Q31 Do you have any other comments on the text of Chapter 13? *No*

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

Q32 Do you have any comments on the text of Chapter 14? *No*

Q33 Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from buildings? *No comment*

Chapter 15 Conserving and enhancing the natural environment.

Q34 Do you agree with the approach to 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? *Yes particularly the latter.*

Q35 Do you have any other comments on the text of Chapter 15 (conserving and enhancing the natural environment)? *No*

Chapter 16 Conserving and enhancing the historic environment.

Q36 Do you have any comments on the text of Chapter 16? *No*

Chapter 17 Facilitating the sustainable use of minerals.

Q37 Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text of this chapter? *No*

Q38 Do you think that planning policy on minerals would be better contained in a separate document? *Yes*

Q39 Do you have any views on the utility of national and sub-national guidelines on future aggregates provision? *No*

Transitional Arrangements.

Q40 Do you agree with the proposed transitional arrangements? *Yes*

Q41 Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in this document? If so, what changes should be made? *No*

Q42 Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in this document? If so, what changes should be made? *Publish guidance alongside that for minerals (see 38)*

Q43 Do you have any comments on the glossary? *No*

Recommendation

That the above comments are conveyed to the ministry of Housing, Communities and Local Government.

Barry King - March 24th 2018