



Better Planning Coalition NPPF consultation response

The Better Planning Coalition represents 34 organisations across the environment, planning, heritage and housing sectors. We have come together to push for improvements to the planning system, to make it work better for people, climate and nature.

In combination, our member organisations are the largest collection of planning experts in the industry today. We are the go-to place for MPs and Peers and are working across all parties to make planning better.

The National Planning Policy Framework (NPPF) represents the central core of planning rules in England. It is here that councils and decision-makers look when writing their local plans or deciding on individual applications.

When it was first introduced over a decade ago, the NPPF set out to streamline the English planning system and introduce a ‘presumption in favour of sustainable development’.

We believe the upcoming review of the NPPF is a fantastic opportunity to make positive changes to our planning system and deliver something which meets all of our national and international commitments, such as species abundance and Net-Zero. Our planning system is the toolbox for thriving communities. It has vast potential to deliver positive outcomes for people, nature and our economy, supporting the delivery of new homes and reducing unacceptable health inequalities.

As a group, we have decided not to respond to individual questions in the consultation but instead to set-out our broad views on a reformed planning system. Individual members of

the coalition are submitting their own responses which go into specific detail on the consultation questions.

In July 2021 the Better Planning Coalition set-out [Six Tests](#) for the success of an updated planning system. Since then, we have made representations to Ministers and tabled amendments to the Levelling Up and Regeneration Bill as it has passed through Parliament.

The BPC believe that some changes must be enshrined in law, for example It is essential to amend the Levelling Up and Regeneration Bill to make the legal connection between the budget and provisions of the Climate Change Act 2008, Environment Act 2021 and plan-making and decision-taking on all development. Without this legal connection, there is no level playing field, no proper direction of travel, and no certainty for economic rewards, societal benefits or environmental gains.

However, we also welcome this consultation and the additional detail which has been provided in some areas. We also welcome the opportunity to input and influence the NPPF as it is being refreshed. Clearly policy has to, in many cases, follow the progress of the Levelling-Up Bill but we hope that further promised consultations will come out before the bill receives Royal Assent so that clarity of the future scope and operation of the planning system can be achieved.

We acknowledge that the Government is trying to provide better support for a plan-led system through both the Bill and policy changes but have concerns about the effectiveness of some of the measures being proposed and their unintended consequences in the longer term.

In general, we welcome the further emphasis on design as being an important part of the planning system. Clearly, there is a need for resources, skills and training to turn this from policy to reality. We want the NPPF to champion beautiful, quality places that are in keeping with local character. This means appointing Design Ambassadors at local authority level to champion good, holistic, sustainable design and, reviewing permitted development rights that have led to poor quality housing with little access to facilities, services and open space.

Well-designed development, and particularly high-quality placemaking, is vital for building healthy communities. However, we need clarity over the definition of beauty. The focus should also be on good design – addressing the negative effect on our health and wellbeing from poor design and creating places where people and nature can coexist harmoniously – rather than style, building on the momentum of the last NPPF and NMDC.

The continuing use of 2014 housing targets is problematic. Targets should reflect the current need and should always prioritise Brownfield first, to protect the environment and countryside.

We do have concerns about the role of democratic oversight and scrutiny within the system. Planning should be based on the principle of accountable decision making and the balancing of private development interests with the provision and protection of public goods.

Collectively, the Better Planning Coalition believes that NDMPs should always be subject to Parliamentary and Public scrutiny before being enacted and that NDMPs should be drafted in a way that does not prevent local authorities from being more ambitious in achieving the stated aims of the policy (the 'floor not ceiling' principle).

The NPPF consultation makes clear that Government intends that NDMPs should include a rationale and so clarity on what counts as being 'more ambitious' could be set-out in each case.

It is vital that there is clarity and consistency in the relationship between national and local-plan policies.

The coalition also has worries about de-regulation of the planning system and continued expansion of Permitted Development Rights, particularly where there is little or no oversight of proposals from local authorities. This is particularly worrying where it impacts heritage assets and their settings, nationally protected landscapes or ecological sites. This could undermine key policies in any revised NPPF (and ultimately NDMPs) in respect of beauty and placemaking, climate and carbon, nature's recovery and environmental improvement along with health and wellbeing of the population.

Planning is one of the key drivers in climate adaptation and mitigation. But there needs to be stronger links between the planning system and other important environmental improvement documents and strategies (for example LNRs and the Environment Improvement Plan). If targets on climate are to be delivered effectively, guidance and regulations to provide clarity on these links needs to be published urgently.

It is therefore essential to amend the Levelling Up and Regeneration Bill to make the legal connection between the carbon budgets and provisions of the Climate Change Act 2008 and plan-making and decision-taking on all development. Without this legal connection, there is no level playing field, no proper direction of travel, and no certainty for economic rewards, societal benefits or environmental gains.

In addition, climate mitigation and adaptation need to become central planks of the whole NPPF and future NDMPs. They should build on current measures for tackling and adapting to climate change and ensure that local plans are in alignment with both a council's own carbon reduction commitments and national undertakings.

Likewise, individual planning decisions giving rise to significant carbon emissions (such as fossil fuel extraction or airport expansion) continue to be taken with no clarity as to how the individual and cumulative impacts from carbon emissions are to be addressed in the planning process. In fact, missing from this consultation was anything on transport which seems a real oversight, given it is the largest sector for carbon emissions. Connected and compact communities, where people can meet the majority of their daily needs within a reasonable distance of their home by walking, wheeling or cycling or using public or shared transport, can be shaped by broad spatial planning principles.

The lack of robust methodologies for carbon impact assessment at plan and decision-making stage and the lack of clear policy (and consistent approach from planning inspectors) are a

major threat to the UK achieving its carbon reduction commitments. We therefore welcome the request through this consultation for input into identification of suitable processes and methodologies for this.

Turning to nature, we welcome the aims of the NPPF to ensure planning decisions contribute to, and enhance, the natural and local environment. The planning system must contribute to tackling biodiversity loss: this means better protecting species and our most important habitats and positively supporting nature's recovery.

The intention stated in this consultation document to consult later on the integration into national planning policy of Biodiversity Net Gain, Local Nature Recovery Strategies, strengthened protections for ancient woodland, and on opportunities for small-scale nature interventions in planning policy is a welcome starting point. However, there are no specific changes to the NPPF for nature and biodiversity proposed in this consultation, nor does the consultation propose any of the changes that are needed to ensure that the land use planning system protects and recovers important sites for biodiversity and ensures development contributes to the recovery of nature. This is a significant missed opportunity for tackling the urgent ecological emergency.

We believe that human health, wellbeing and equality should be embedded in the planning system, including priorities for access to protected natural green space, active travel and reducing air pollution.

There should be a general duty for local planning authorities to consider the reduction of health inequalities, which would be measured based on healthy life expectancy to mirror Levelling Up Mission 7. There should be a second duty to improve wellbeing, mirroring Levelling Up Mission 8.

These duties would allow planners freedom to interpret this appropriately for their areas, but would include issues such as access to nature, opportunities for everyday exercise, access to sustainable transport and safe, affordable housing.

The NPPF refresh should prioritise proximity to existing services for new housing developments and ensure that new and existing communities are planned, bringing together homes, jobs and key local infrastructure.

Finally, housing. The coalition agrees that we do need to build more homes. We particularly need to build social and truly affordable homes and ensure the definitions of these are fit for purpose. These should be built in the right places and we are disappointed that the government is wasting this opportunity by not bringing in a genuine brownfield first policy. We believe this means the prioritisation of suitably located urban brownfield sites over of low biodiversity value greenfield for large scale housing development, both in terms of public investment and in local planning policies to control the sequence of (or 'phase') developing sites allocated for housing in plans. As well as a brownfield first approach we also support the recommendation set out in the paragraph 3.8 of the [Independent Review of Build Out Rates](#), published by government in October 2018. It calls for a greater diversification of housing tenures such as affordable and social housing on large sites.

Local authorities who refuse poor quality, unsustainable development in the wrong place must be supported but we are aware that the proposed NPPF changes within the consultation provide multiple opportunities for local authorities to avoid providing the houses that the country needs.

A safe, warm, affordable, stable home is a basic human need. If that need goes unmet it has significant detrimental impacts on the health and wellbeing of the population. Ensuring access to high quality affordable homes in neighbourhoods that support health and wellbeing will also boost economic growth. Our aspiration for levelling up should be based on making sure that everywhere is a good place to live, regardless of income. The availability of housing in neighbourhoods with high quality amenities and sustainable transport infrastructure can act as a “magnet” to a skilled workforce which then attracts or creates businesses and investment.

Therefore, while we support refusals for the wrong development in the wrong place, we do not think that should be the end of the story. Where the quality of the proposed development is not up to standard, local authorities should be supported to negotiate with developers with the aim of achieving a proposal that can be approved. Where a development is being proposed in the wrong place, local authorities should be supported, and further required, to identify and allocate sufficient land in the right place.

A commitment to quality development should not be used as a route to under providing housing.

8.5 million people in England are facing some form of unmet housing need. For almost half of those people social rented housing would be the most appropriate tenure to address this. We must ensure targets are set locally based on a robust local assessment of need.