

The RTPI’s response to the consultation ‘Levelling-up and Regeneration Bill: reforms to national planning policy’

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Questions from ‘Chapter 3 – Providing certainty through local and neighbourhood plans’

1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

We understand the logic behind this proposed change and agree that plans which are harder to overrule and less resource-intensive to produce would be beneficial to LPAs and their communities. We appreciate how frustrating it can be for a community to see a plan which is adopted being immediately weakened, often due to circumstances outside their control.

However, LPAs should be continually reviewing their housing land supply as a matter of best practice. The consultation document suggests that increasing the proportion of local authorities that have an adopted and up-to-date local plan would in itself lead to an increase in homes delivered, regardless of plan quality. This is something which we question.

Indeed, the government should recognise that, in conjunction with the other changes proposed, this proposal will likely have the overall effect of reducing the number of homes built across England, and moves the system away from achieving the government’s 300,000 homes-a-year target. The reduced pressure on LPAs to demonstrate land supply and that they are meeting housing need will increase developers’ uncertainty about the extent to which an area has a deliverable pipeline of land forthcoming (with the greatest impact being SME builders, who this framework seeks to empower), and uncertainty for LPAs, some of which are [already halting development of their local plans](#).

This change is part of an overall picture in which there are few incentives for LPAs to plan to deliver more homes in places where they are ‘needed’ or generally desirable. It is reasonable in principle to shift to a system in which those incentives are not linked to quantitative assessments of need and the threat of speculative development, but there needs to be alternatives. The government should consider how these can be introduced.

Overall, if the proposed changes are made:

- It will remain important for LPAs to monitor and review their housing land supply, and publish this information. .
- LPAs should be prepared to be audited independently on their evidence of supply, to avoid appearing to be judge and jury in their own cases, if they wish to take advantage of this concession.
- Government should require that plans overall, and their housing land supplies, are subject to statutory review timetables.
- Government should consider instructing LPAs, when plan making, to plan for a housing land supply longer than the lifetime of the plan (perhaps over a six or seven year period). This would reduce uncertainty when plans are due to be renewed or replaced, and increase the likelihood of a sufficient pipeline throughout the plans’ lifetime.
- As a general point, housing targets must come with investment in infrastructure and planning services required to support their delivery. Failure to do so undermines faith in the system and delivery itself.

2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Again, we understand the concerns which underpin this proposal and its overall direction of travel. However, it is important to maintain some degree of consistency and contingency in planning for housing needs and land. The latter is important because the deliverability of sites is contingent upon a wide range of factors than can change significantly over time and after planning permission has been granted.

We therefore support the removal of the 10% and 20% buffers , but only where an LPA's past performance on meeting housing delivery targets can be proven to the Planning Inspectorate, together with reliable evidence that they are likely to be met in the immediate future. For the reasons stated above regarding contingency, we believe that the general 5% buffer should remain in all cases.

3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

We understand the logic behind this change, but question how widespread an issue oversupply early in plan periods actually is.

Given the potential downsides and challenges associated with the concept of oversupply, we do not agree that an oversupply of homes early in a plan period should be taken into consideration when calculating a 5YHLS later on.

First, it would be difficult to ascertain whether an LPA has 'oversupplied' when plans' lifetimes overlap. Second, historic targets, against which LPAs would have been delivering, are by nature out-of-date and less relevant. We believe that using these as the basis to determine over or under supply could be problematic. Third, the proposals do not appear to take into account the housing needs of different groups in relation to oversupply. Would a general oversupply of market rate homes to buy mean that an LPA would no longer have to plan for a supply of land suitable for affordable and specialist homes, etc?

4 What should any planning guidance dealing with oversupply and undersupply say?

Given the points raised above we question whether these changes need to be made. Please see our answer to Q1 for possible guidance.

We'd be happy to contribute more fully should the government wish to consult on this further.

5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

RTPI members strongly felt that neighbourhood planning has a potentially valuable role to play in improving community engagement and understanding of change in the built environment at a grass roots level. However, communities often find the neighbourhood plan

process time consuming and labour intensive, and the take-up of neighbourhood plans in disadvantaged urban communities – where they may be most valuable - [has been disappointing](#).

The RTPI therefore broadly supports these changes, which give communities a greater sense of agency and incentivise the production of neighbourhood plans. Neighbourhood plans retaining their decision making weight for longer, in relation to decisions where the Presumption applies, will also help with the resourcing challenge by reducing the need for them to be reviewed regularly.

However, the key barrier to the take-up of neighbourhood planning, particularly in in disadvantaged communities, remains [a lack of skills and financial resources](#) in parish and town councils to begin the process. This is the key challenge the government needs to address.

Questions from ‘Chapter 4 - Planning for housing’

6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

Yes, RTPI members believe that the Framework’s opening chapters should provide a much clearer sense of the government’s view of the importance of planning, not just for homes, but for all types of development. The NPPF should focus upon national issues and provide a framework for these to filter down to local action, rather than providing national policy for inherently local issues.

The opening chapters should be clearer about what types of planning enable the delivery of new homes. The Framework’s opening chapters should also give greater weight to the quality of homes and places, and the positive impact that high quality places and homes can have across society.

7 What are your views on the implications these changes may have on plan-making and housing supply?

As stated in our answer to Q1, we understand the government’s concerns on housing delivery and agree that the current plan making system can be technocratic, cumbersome and reduce community trust. Addressing these issues is something the RTPI supports. But, particularly when viewed alongside proposed changes to densification and greenbelt review, these proposed changes to the framework do not provide enough incentives to local leaders to plan for development that would otherwise be in the public interest, locally or nationally.

Consequently, whilst these changes set out to empower plan making and enable the delivery of sustainable, appropriate, housing, it is likely that they will have the opposite effect. Housing supply is likely to fall most where it is most needed.

The root cause of this problem is that the proposed changes misunderstand the existing barriers to effective housing delivery and effective planning more widely. As set out in our introductory remarks these relate to:

- A lack of an unambiguous commitment to using planning to achieve a range of society's goals, not just housing supply, in partnership with communities and with clear priorities set out in national policy;
- A lack of strategic planning over areas larger than a single local authority; and
- [Severe levels of under-resourcing across the system.](#)

Alongside these foundational problems, both the proposals themselves and the way in which they are being taken forward are causing significant risk and uncertainty to developers and LPAs. Ironically, these are a problems which they aim to address. We have already seen the effects of these changes, with at least 47 local authorities recently withdrawing or delaying their local plans.

8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

The current policy suffers from a lack of clarity around what an acceptable alternative to assessing need would look like, and this takes away from what could be a progressive policy.

The RTPI agrees that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach. However, these local approaches must be reviewed in a clear and rigorous manner against published policy and guidance.

The guidance and review process must ensure that the primary aim of using alternative methodologies is not to simply reduce housing numbers but to meet local housing needs most effectively and according to genuine local characteristics.

9 Do you agree that national policy should make clear that Green Belt [sic] does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Green Belts

Green Belts, since their initial creation and implementation, have shaped much of the nation's development, helping to control urban sprawl and direct development in many places. However, Green Belt policy was designed to accompany proactive planning for new settlements, to operate over whole city regions (not individual districts) and to be dynamic. In current practice, RTPI members have noted that neither are the case now.

Although it will remain possible for local decision makers to voluntarily review Green Belt in their local areas, we are concerned that the proposed changes will mean that Green Belts act simply as an unchangeable policy constraint on land use.

The outcome is likely to be that even in places where there is a strong case to be made for a Green Belt review, it will not necessarily happen. This will inevitably have a negative impact upon the affordability of housing in specific areas. It is clear that if the government chooses to undertake this policy direction, they must provide incentives for reviews where they are needed or beneficial.

We believe that proportionate reviews of Green Belts at a strategic (i.e. city-regional) level are important for them to serve their intended purpose as a policy tool for preventing urban sprawl. The reviews must be flexible to react to changing needs and settlement patterns as well as accommodating high-quality development.

Densification

We are also concerned by the interpretations of 'density' and 'character', because these changes are likely to disincentivise densification, even in circumstances where it is the most suitable option.

It is difficult to marry this approach with the government's targets of a 35% uplift in the largest cities and we question how these two goals can be achieved simultaneously. Whilst local design codes will help to define character, we are concerned that these changes will tilt outcomes in favour of objectors as opposed to enabling sustainable development.

Further, 'density', much like 'character', is a complex concept to apply in practice without very clear guidance. There is a wide gulf in terms of community acceptance and appropriateness between so called 'gentle densification' and the construction of tall towers. To regard all 'densification' as one issue masks this important distinction. More generally, 'character' changes naturally, and changing the character of areas, for example, via regeneration, can be an important and positive part of planning.

Overall response

Our greatest concern with these three changes is that, acting together, [they will work together as a 'pincer' on development](#), which is likely to reduce overall housing delivery, and perhaps most significantly, undermine the delivery of affordable and specialist housing even in the places where it is most needed and sustainable.

RTPI members strongly feel that an issue such as the Green Belts needs to be reviewed at a strategic (city-regional) level and should not be viewed as a static blocker to development. It has to be planned and reviewed, in terms of its purposes, amenity and overall value, at a bigger-than-local level, which takes into account housing markets, commuting, the quality of all green infrastructure in an area and future housing need.

If the proposed plans go ahead then the government must consider what incentives are in place for LPAs to review their Green Belt allocations. The changes will also place a premium upon strong and forward-looking leadership to ensure that areas can still deliver the sustainable development that they need.

10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

This is a confusing turn of phrase, given the language used in question 9. The accompanying text suggests that LPAs would not have to meet their housing need if their only option for doing so was via out-of-character densification. It does *not* suggest that an LPA would only be able to densify an area in a way that changed its character if it was able to prove it was *necessary* (i.e. the only way it had of meeting need).

The first applies the burden of evidence to those local authorities not wishing to meet need via out-of-character densification. The second applies the burden of evidence to those local authorities that are willing to meet their housing needs through densification that may be perceived as out of character. Indeed, the second suggests that they must demonstrate that is the *only* way of meeting need.

In practice, applying the burden of evidence in this way to local authorities that wish to densify would further disincentivise them from meeting their needs and/or, in urban areas, achieving the 35% uplift.

Also, as a general principle, the decision to densify should be a matter of local discretion, made through local policy and design codes.

11 Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination?

Many RTPI members feel that the removal of ‘justified’ goes to the heart of the legitimacy of the planning process. The local (and also the national) state rightly supersedes private property rights in the public interest. However this requires that the public interest be objectively demonstrated in agreed ways. Any suggestion that plans need not meet this high bar must be resisted.

It was widely agreed across our member roundtables that the current plan making process is onerous, and that current evidence requirements can be too burdensome, with PINS’ assessment criteria unclear. The RTPI therefore supports efforts to simplify the plan making process, so long as this does not undermine the effectiveness or legitimacy of plans. The solution to this is to encourage best practice in evidence gathering, maximise the use of digital data, improve how PINS guides local planning authorities, and, above all, sufficiently resource local planning teams.

It is our contention that it is a shortage of the best qualified plan-making staff which causes a risk averse approach to evidence, in which evidence is merely reproduced, not expertly evaluated. The planning profession risks becoming a post box for large quantities of disparate expert evidence, whereas it was and should be involved in curating evidence carefully.

12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

No comment.

13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

We assume that this question refers to this proposed new paragraph:

“The Standard Method incorporates an uplift for those urban local authorities in the top 20 most populated cities and urban centres. This uplift should be accommodated within those cities and urban centres themselves unless it would conflict with the policies in this Framework and legal obligations.”

As a general proposition, RTPI members have severe reservations about the ‘uplift’ and consider it is insufficiently justified. Indeed, the calculation of housing targets is already intended to take account of how relatively populous places are through the application of statistical method. Our members have reported examples of local authorities which are not attempting to meet the uplift for this reason.

The uplift is also symptomatic of a general over-emphasis on housing delivery at the cost of many other crucial policy objectives. Local authorities may, for example, earmark what would be crucial employment land for additional housing, to the detriment of local economies, employment patterns and labour markets.

These wider points aside, this addition raises a number of issues. Firstly, it is hard to see what incentives there are for LPAs to achieve this uplift given this consultation’s proposals on plan making, housing need, and densification. The last of these in particular, when considered alongside the fact that some urban local authorities have very little viable brownfield land for development, would seem to make achieving the uplift almost impossible in some places.

Strategic planning

More generally, if the government wants to pursue a policy of focusing development on England’s most populous towns and cities then it must do so at a strategic ‘urban’ or housing market level, rather than at a local authority level. This is because administrative boundaries often do not correspond to employment/labour market or housing market areas in any meaningful sense.

Planning for housing and related infrastructure at the strategic level means that local authorities work together to ensure that housing needs can be met across a broad urban area, with new developments occurring where they are most suitable and sustainable (whether this is targeted regeneration in deprived areas, meeting demand by building in the places most able to accommodate it, or delivering specialist housing where it is most viable, for example). Strategies for transport systems, green and blue infrastructure, employment, and housing can be interlaced to produce sustainable and productive settlement patterns as a whole, with central government support targeted where it would bring the most benefits across a large area. Planning and bringing forward sites at this scale – whether

patchworks of small sites or single, larger sites, can also bring efficiencies on the supply side.

We understand that there are political challenges to planning for housing at this scale, but as earlier noted, Combined Authorities and Counties provide existing institutional frameworks which could be given the statutory powers to do this. Establishing [Green Growth Boards](#) may be an effective way of overcoming some of these challenges more widely.

It is important to note that whilst the duty to cooperate wasn't robust enough to enable a truly strategic approach, its removal hinders any attempt to deliver cooperative approaches to development. How effectively these issues can be resolved in the future will depend to a great extent on the proposed 'alignment policy' which the sector is yet to be provided the details of. We look forward to the government's consultation on this and hope it provides the foundations for genuine strategic planning.

Finally, if the government does wish to continue with this proposal – which is essentially a 'regeneration first' policy - it is crucial that Homes England fully support and coordinate their strategies with relevant local authorities to 'pump prime' challenging sites and link their work to investment in infrastructure and access to employment.

14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

As noted above, to successfully densify England's largest cities and towns, housing should be planned by the urban and housing market area, not in individual local authorities. Additional policy (including the new 'alignment policy') and guidance must work towards enabling this.

If the government decides to maintain its focus on driving uplift in individual local authority areas, its policy and guidance should focus on providing as much clarity as possible on other proposals which appear to contradict this one. A key issue is how local authorities can make the case for densifying neighbourhoods without compromising character and, closely linked, what 'significantly out of character' means.

As also noted above, Homes England will play a decisive factor in unlocking the sites that make it possible for local authorities to achieve the uplift required of them. Effective policy and guidance on this will be important.

15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

As noted in our response to question 13, assessing need and then planning for housing and its associated infrastructure should be done at the strategic (city-regional) level. Any uplift should be considered as part of this and not primarily be the responsibility of core towns or cities, which often have very limited development opportunities.

16 Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

Given the fairly long lead time indicated (2024) to deal with the outcome of the 2021 Census, we agree that it is sensible to take a more cautious approach to meeting targets which are based on data which is 9 years old. However, should the Government wish to continue to use a similar data-based approach it should be prepared to invest in far more responsive data. Even now it is not clear why, when the 2021 Census appears to be already available, it is necessary to wait an entire year to digest its implications.

17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

No comment.

18 Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

The government’s long-standing position on intervening in the operation of the planning system at the local level seems odd if it does not have any data on the number of homes included in each permission.

Prior to 2010 regional planning bodies maintained effective data on real land availability (as opposed to the performance of development management) and many local authorities still do this, despite severe cuts to staff. More would be able to do this if monitoring teams had not been so severely cut back due to under-resourcing.

A key challenge to address is the meaning of the word ‘deliverable’. The proposed changes do not provide details of how deliverability will be assessed more rigorously at examination, which can be a pre-existing issue preventing the adoption of plans that maintain robust assessments of supply.

It is also not clear whether the suspension of the Housing Delivery Test would apply if the authority had sufficient permissions for 5 years or for the whole plan period.

In tandem with the changes to the ‘forward looking’ changes to the 5YHLS, this ‘backwards looking’ change may significantly reduce the extent to which the presumption is applied. This *may* have the positive impact of giving local authorities a greater sense of control and fairness over housing sites that do get developed, but it *is* likely to reduce housing delivery in many areas.

It is important to note that different sites (for example, of different sizes) have very different rates of delivery. Permissions given and homes built are not the same thing, and councils’ roles in securing sustainable development do not stop at the point of granting permission.

19 Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

No comment.

20 Do you have views on a robust method for counting deliverable homes permitted for these purposes?

See answer to question 18. The issue is not whether *the government* has the data, but rather whether the data exists. The under-funding of local planning authority monitoring teams should be urgently addressed as part of the government’s long awaited solution to the overall funding of LPAs. Local Authority net expenditure on [planning fell by 43%, from £844m in 2009/10 to £480m in 2020/21](#). Addressing this is a crucial first step in improving both monitoring and delivery.

21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

No comment.

Questions from ‘Chapter 5 – A planning system for communities’

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

RTPI members support policy changes which enable LPAs to plan for the delivery of social rent homes where they are needed. Relatively simple changes to the NPPF could encourage this, and they should emphasise both the direct benefits of delivering more homes for social rent, and the ways in which they can aid the delivery of other priorities in the NPPF.

However, there is a wider point here about the extent to which central government should be determining the percentage of homes in new developments which are for social rent or affordable ownership. As we note elsewhere in our response, the role of the NPPF should be to set *national* priorities and direction, not local policy on issues which vary greatly depending on local context.

With this in mind, guidance on how LPAs can harness ‘alternative’ delivery models which can effectively deliver homes for social rent, particularly direct delivery by local authorities, and community land trusts (or other forms of community-led housing), would be valuable.

The key barriers to these forms of delivery often sit outside of planning policy (for example, the ‘[right to buy](#)’ in the case of direct delivery, and lack of [access to finance](#) for community land trusts). We would therefore encourage government to consider other policy levers at its disposal to encourage the delivery of social rent homes, particularly direct grant capital funding, for which there is often an exceptionally strong long-term business case.

23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people’s housing?

Yes. The RTPI broadly agrees that, given demographic trends, the NPPF should more strongly support the supply of specialist older people’s housing.

The new text identifies the types of housing for older people which an LPA may plan for – ‘retirement housing, housing-with-care and care homes’. But given the variation in both older people’s housing needs and the means of meeting them (and that the construction of new homes is not always the most effective way of meeting these needs), a more effective approach may be to provide guidance or policy on locally-tailored approaches to effectively assess [older people’s housing needs](#). Currently, older people’s housing needs in an area are generally established through needs assessments that depend on high-level demographic data and projections, alongside [unevidenced assumptions about older people’s preferences](#). This results in housing being built for older people which may not actually meet their needs.

24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

The existing policy states that LPAs should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. We consider that this is the right policy as long as it continues to be subject to local circumstances.

However, [recent evidence suggests that LPAs that accommodate at least 10% of their housing requirement on sites smaller than one hectare do not see an increase in the delivery of dwellings on these sites](#). Further, it should also be recognised that there is not necessarily a correlation between the initial size of a site and whether it is available to SMEs.

The RTPI made it clear in the [consultation on the 2018 NPPF](#) that to stipulate a 10% rate across the board would make no sense in those parts of the country where there is rapid growth on greenfield land.

It may, however, be sensible for Homes England (and local authorities) to continue to divide up sites so that SMEs can access them.

25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

In addition to the above, LPAs should be encouraged to plan for small sites across their areas in a joined-up way. This would secure delivery-supporting infrastructure through planning gain (which would in turn help LPAs to prioritise this kind of development), which can be very difficult when done in a more fragmented and site-by-site way. Encouraging SME developers to deliver these pooled sites in consortia would also facilitate this.

26 Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

No comment.

27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

The only point we would make, which we have set out in more detail elsewhere, is that the key barriers to community-led housing are a) the cost of securing land (and the availability of finance to do this), and b) skills and resourcing. If the government wants to make it easier for community groups to bring forward affordable housing it should focus on these two issues.

28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

No comment.

29 Is there anything else national planning policy could do to support community-led developments?

The key barriers to community-led developments are:

- A) the cost of land acquisition through the open market and;
- B) skills, particularly in disadvantaged areas.

Policy/guidance on the role LPAs can/should play in transferring or allocating land for community-led developments, and particularly how to fully weigh up the potential long-term costs and benefits of doing so in line with the Green Belt’s emphasis on social value, would help to address barrier A.

Barrier B will require a long-term program of grant funding and targeted capacity building.

30 Do you agree in principle that an applicant’s past behaviour should be taken into account into decision making?

Planning is focused on land use and the future of places, and to ensure fairness and rigour, decisions should be made only on the merits of an application. This is a long standing and important principle in planning.

It is worth noting that many applicants that are RTPI members are bound to a strict code of conduct that requires they act in the public interest and in a professional manner.

31 Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

As mentioned in our response to question 30, we do not think it would be appropriate for applicants' past behaviour to be taken into account in decision making.

In addition to being flawed in principle, it is flawed in practice. For example, supposedly 'disreputable' developers could easily 'game' the process by setting up special purpose vehicles to bring forward developments, and applications are often in the landowner's name. How would it be established that a developer is 'to blame' for slow build out rates, when a huge range of factors could be involved? Additionally, local authorities themselves are often applicants – would they penalise themselves?

32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

We have no in-principle opposition to options a) and b).

However, if the government wants to address the underlying issue of slow build out of permissioned development sites it should be mindful of [the findings of the Letwin Review](#). This found that 'land banking' is not a major issue, and that absorption rates could be improved by:

- Dividing up larger sites into smaller ones (although this is challenging in many circumstances there are good international exemplars); and
- Ensuring that sites contain homes with a variety of tenures (generally a good thing in and of itself, and therefore something which policy should strongly encourage). Option B) does work towards this, but we would suggest an approach based on positive policy and incentives linked to outcomes, rather than 'requiring' developers to explain how they propose to increase their absorption rates.

Questions from 'Chapter 6 – Asking for beauty'

33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

We endorse the intention to encourage well-designed places, and a greater consideration of aesthetics and local distinctiveness.

'Beauty' is an effective concept only if it is defined by strong, locally developed, design codes which are genuinely shaped by communities and their local contexts. It must also encompass 'good design' in both a technical and aesthetic sense.

34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word ‘beautiful’ when referring to ‘well-designed places’, to further encourage well-designed and beautiful development?

We have nothing further to add.

35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Yes. This could be an effective way of ensuring that schemes maintain design standards after planning permission has been granted.

36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

This is too granular an issue to warrant a specific reference in national policy. We think that the issue of mansards should be governed by local design guides created in discussion with the local community.

Questions from ‘Chapter 7 – Protecting the environment and tackling climate change

37 How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

As the RTPI have noted in response to [other government consultations](#), it is very concerned that the roll out of biodiversity net gain (BNG) is insufficiently supported by direct new burdens finance from DEFRA. As of 21 February this concern has been alleviated, and we welcome the delay to the application of BNG to small sites until April 2024. We agree with proposals to prevent the downgrading of biodiversity immediately prior to making planning applications.

The introduction of Local Nature Recovery Strategies (LNRS) is a welcome first step in improving how we plan for the environment. However the Government needs to go a great deal further. As it stands there are two major weaknesses in this approach:

Firstly, there is insufficient coordination between LNRS and local plans. The consultation document states that local plans will have to follow LNRS, but there is no corresponding requirement for the LNRS to follow local plans. This seems a very impractical state of affairs. Furthermore, the government has set up no mechanisms by which an LNRS would relate to a number of different local plans in the same territory. To remedy this, the RTPI has proposed that [Green Growth Boards](#) (referred to elsewhere within this response) be set up to align the various local plans with each other, and also with LNRS and local transport plans.

Secondly, the Government should set out plans to reduce the current high level of complexity of environmental plans. The recent statement by DEFRA indicates a degree of recognition that this is needed, and that it is made easier by leaving the EU. The RTPI's proposal for [Local Environment Improvement Plans](#) would do this by going beyond the limited scope of LNRS to embrace other key issues of water and climate (these issues are of the greatest concern to planners). As it stands, we have heard that there is very little planner involvement in LNRS, even in unitary authorities. This is partly due to the ongoing resourcing crisis in plan making: very few planning departments can spare staff to support the LNRS, even though planners actually have valuable skills in plan making which would be very helpful in this context.

Finally, we have several concerns about the introduction of national policy on the use of artificial grass. This should not be an issue for national policy. We question the extent to which this actually is a significant problem nationally, and any policy/guidance would have to carefully distinguish between illegitimate and legitimate uses of plastic grass (for example on sports pitches).

38 Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

We do not agree. Grades 1-3A are currently protected. These are the grades which are most useful for food production, so it is unclear what this change would add.

39 What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

The RTPI supports the "PART z" campaign to:

- (1) move swiftly to obligatory reporting of embodied carbon, and
- (2) move gradually but irrevocably toward increasing limits on the amount of embodied carbon permitted in developments. However, this is a matter for Building Regulations.

Notwithstanding the above, we need to go further than the consideration of embodied carbon only, towards adopting an effective way of measuring the carbon emissions arising from a chosen development strategy and development proposals. Embodied carbon is part of this but the matters to be addressed go much wider including, for example, the emissions arising from transport.

Even within the narrower scope of embodied energy, thinking about embodied carbon in spatial planning at plan-making and master planning can deliver significant carbon savings. Indeed, a [study from UKGBC found that](#) 'by implementing a range of easy wins and cost-effective design interventions, the stretch scenario would reduce the embodied carbon of the original masterplan by 20.3%, a total of 670,000 kgCO₂e.'

Assessing the carbon implications of a proposed strategy (and options) should be an integral part of plan-making. Without such an assessment it cannot be demonstrated that the plan is

in line with delivering net zero by 2050 and the applicable carbon budgets. Local planning authorities are [bound by the legal duty](#) on local plans to include ‘policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’. This powerful outcome-focused duty on plan-making clearly underlines that priority is to be given to tackling climate change and its impacts. The duty is rolled forward in the Levelling-Up and Regeneration Bill.

In discharging this duty, local authorities should comply with paragraph 153 of the NPPF and ensure that local plans are in line with the objectives and provisions of the Climate Change Act 2008. This means the local plan’s development strategy (and supporting policies) should be consistent with both the Climate Change Act’s net zero target and the supporting carbon budgets. [The Sixth Carbon Budget](#) requires, by law, that greenhouse gas emissions be reduced by almost 80% by 2035.

Without an assessment of the carbon implications of the proposed development strategy, it is hard to see how a plan (or spatial development strategy) can be found to be sound. To be sound, a plan should be consistent with national policy and enable “the delivery of sustainable development in accordance with the policies in this Framework” (paragraph 35 in the NPPF). Paragraph 11 in the NPPF expects plans to apply a presumption in favour of sustainable development, which for plan-making “means that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”.

Without sound plans in place, tested to ensure alignment with the Climate Change Act 2008 (CCA08), then the government cannot be confident that spatial planning is making the expected contribution to emissions reductions and, in turn, contributing fully to s13 CCA08. Locally, without an assessment of the carbon emissions that a plan’s strategy will give rise to, those responding to plan consultations will have no idea whether a draft local plan is consistent with national policy and the statutory requirements, or the actual anticipated carbon implications of the chosen strategy and supporting policies.

Provided a plan is shown to be sound, then some form of assessment of implementation should be made to understand whether a plan is being implemented as intended. The denominator would be the expected, annualised carbon emissions from the strategy and the numerator would be the estimated annual carbon emissions from new development consented. This estimate could be derived from the information submitted in support of a planning application.

Ideally, the assessment should be reported on annually through a local planning authority’s annual monitoring report, and to DLUHC. To underline an earlier point, what’s the purpose in having national planning policy on climate change unless (i) you know it’s making a difference on the ground and (ii) all other things being equal, the most appropriate planning strategy to cut carbon emissions has been chosen?

[Mission Zero](#) has underlined the importance of ‘reforming the planning system at local and national level to ensure it properly supports net zero.’ Without a carbon assessment of what is proposed and delivered, this recommendation cannot be achieved.

40 Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

Energy infrastructure and climate change should have equal status with the provision of housing, transport and economic growth in national policy. This should enable local planning authorities to take appropriate action, including by setting targets which go beyond national standards (which should provide a baseline on standards rather than a ceiling) and laying out clear metrics for carbon accounting, monitoring and reporting in Local Plans.

Government needs to demonstrate clearly that it is serious about using the planning system to secure “radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience” (current NPPF paragraph 148). Currently this is hard to believe due to the emphasis on housing delivery above almost all else and all that has followed from that, including short term considerations about viability (rather than costs to occupiers over a building’s lifetime or to the public purse). There is no implementation architecture on climate change to match that on housing delivery. There is also no testing by the Planning Inspectorate on the soundness of plans on climate change, and few supportive appeal decisions. This needs to change.

To do this we need an overarching framework for securing economic recovery, delivering housing numbers and building attractive places. Action on carbon reduction should be the first amongst equals in the planning process. National policy should set out a carbon reductions delivery test to ensure that all local authorities are accountable for any failure to achieve carbon reductions in new development the same way they are accountable for a failure to deliver housing targets. In short, it should be axiomatic that ‘only development which is fit to take its place in a net-zero emissions future in a changing climate’ should be permitted.

In February 2023 the RTPI and the TCPA published [an updated guide](#) to local planning authorities in the UK on how to respond to the climate crisis.

[Our proposal for LEIPs](#) (see question 37, above) would greatly assist in coordinating local action on climate across housing, transport and the environment (including water, nature and energy).

Questions from ‘Chapter 8 – Onshore wind and energy efficiency’

41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Yes.

The RTPI agrees that repowering existing onshore wind sites, and as a continuing cycle of upgrade, is critical to the nation’s renewable energy supply. However, the new policy will need careful handling if it is not to lead to disaffected local communities adding their voice to concerns about the transition to net zero.

Many communities currently hosting windfarms have been led to believe that sites would be restored (often to their pre-existing condition) after, typically, 25 years. Repowering therefore

needs sensitive handling. Communities hosting existing sites should not have to accept lower standards of engagement, impact or benefit than communities who are asked to host new proposals.

Life-extensions, unlike applications for new sites and likely repowering, will not require pre-app consultation with local communities if secured via a section 73 application to vary a planning condition. All of this will need careful explaining through planning guidance.

42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Yes, see our response to Q41 for further comments.

43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

Responding to this question is not easy, owing to the confusing reference to “existing” and “new” footnote numbers. We believe what this question involves two changes:

First, the insertion of a reference to Supplementary Planning Documents (SPDs). This is welcome development in its own terms, but appears to be out of context with the Government’s intention to abolish SPDs. It therefore can only have a short-term purpose.

This also raises the question of whether local authorities will actually invest the time and resource in preparing an SPD with a limited shelf life. There are further questions about whether Local Authorities have to prepare Supplementary Plans and what happens in the hiatus.

However, we also note that the proposed changes to the NPPF now give scope to use Local Development Orders, Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission for wind turbines “if it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.” It is unclear whether the statutory requirements for pre-app consultation with local communities will be applicable to these routes and this is something DLUHC should clarify.

Second, a provision to require wind farms to only be permissible where ‘it can be demonstrated that the planning impacts identified by the affected local community have been fully satisfactorily addressed and the proposal has community support’ when this test is not used for other development. The same approach should be taken to all development in principle, or not at all.

We note that the wording to this was changed when incorporating Greg Clark’s 2015 Written Ministerial Statement into 2018’s NPPF. This effectively changed the decision to a simple weighing of whether the local community supported a proposal or not.

We therefore suggest that DLUHC give consideration to using the transitional policy from the 2015 Written Ministerial Statement. Reverting to the 2015 transitional policy would provide an off-the-shelf, ready to go test which the Court of Appeal has provided meaning to and,

hopefully, avoid uncertainty, litigation through the courts and delay to onshore wind proposals.

44 Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes.

In broader terms, a wider review of the role of planning and building regulations in handling energy performance may be valuable. This should consider, in much more detail than is possible in this consultation, whether the current scope of permitted development over heat pumps and solar panels is appropriate.

We would also suggest that DLUHC borrow from the 2012 NPPF and reinsert the language of the policy deleted in 2018 that local planning authorities should 'actively support energy efficiency improvements' to existing buildings.

Questions from 'Chapter 9 – Preparing for the new system of plan-making

45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

It is welcome that clarity has now been provided on how local planning authorities in different positions should approach the likely change in statutory plan making following Royal Assent to the Levelling Up Bill.

46 Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

To facilitate a smooth transition in plan making and incentivize the change to the new system, local planning authorities that have an up-to-date adopted local plan should have the option to move straight to the new system. This would provide them with certainty that they are not going to be at risk of speculative development outside the plan-led system. This is particularly important for local authorities to maintain the trust of their communities.

The transitional arrangements should resolve this current gap and ensure all currently up-to-date plans are protected if they choose to progress a new plan under the new system. An amendment is therefore required to bring forward the date of protection so that plans that reach the five-year point before the new system starts are adequately protected.

We suggest the following amendment to the proposals set out in paragraph 10:

'Therefore, in addition to the arrangements described above, we also intend to set out that plans that will become more than five years old from the date of publication of the reform proposals on 22 December 2022, will continue to be considered

‘up-to-date’ for decision-making purposes for 30 months after the new system starts.}]

This simple change mitigates the risk of exposure to speculative applications whilst local authorities prepare new-style plans and ensures that communities can also have confidence in the plan-led system.

47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

RTPI members did not express strong opinions on this.

However, Government should consider how the development of new local plans and neighbourhood plans could be better synchronised. Though it would require resourcing and coordination, this would enable evidence sharing, and for each to inform the other more effectively, with both types of plan becoming more robust and community-led as a result.

48 Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

Aside from the transitional arrangements being proposed, the end of SPDs is a major cause for concern.

There appears to be little sense in abandoning local policy which a) addresses important issues, b) will remain important in most cases, and c) has been expensively produced by resource-starved authorities.

The cost in both time and money of producing completely new Supplementary Plans will be significant, while valuable policy previously covered by SPDs will either need to be integrated into new local plans, or require the creation of weighty Supplementary Plans which have a much more onerous approval process than their predecessors. Indeed, the limited scope of Supplementary Plans suggests that some important issues covered by SPDs will simply not be covered in local policy.

In addition, by being relatively light-weight planning documents to produce, SPDs provide a way for local authorities to quickly respond to emerging policy issues which would otherwise have negative impacts on communities. Proposed Supplementary Plans would not provide this.

As it stands, the transition to new-style Local Plans will mean that the policy ‘hooks’ that current SPDs rely on will fall away, but there is no reason that government cannot legislate to ensure that this is not the case where the successor Local Plan contain unchanged ‘parent’ policy.

Questions from 'Chapter 10 – National Development Management Policies

49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

The RTPI supports the principle of introducing NDMPs.

NDMPs have the potential to simplify plans and give them more direction, streamlining the process and removing bureaucracy. They have the capacity to avoid the duplication which currently happens in local plans, with the possibility to save time at both preparation and examination stage (although we observe that little examination time is actually taken up with these issues), and They could also be valuable in providing local authorities with models or templates of best practice, helping to expedite the process as a whole. This could ensure a more consistent approach is taken across local authorities to certain issues such as housing extensions, and standardisation could help to lower costs for suppliers (however, the impact that the introduction of NDMPs will have on speeding up plan-making remains unclear, as many other requirements remain).

We hold the above view with four important conditions.

First, given the extent to which they centralise decision making power, we believe they should be:

- Subject to a much more thorough and innovative process of public consultation than the government normally employs for new policy; and
- they must be debated and voted on in both Houses of Parliament, much like National Policy Statements.

The present consultation is very vague about what NDMPs may or may not cover.

This is not just important for democratic reasons – research from Scotland illustrates that the usability of the NPF4 has been significantly improved by extensive consultation during its development.

Second, we are concerned that, if not deployed effectively, they could stifle innovation. In the area of climate action for example, excellent progress has been made by individual local authorities such as [Leeds City Council](#) at the cutting edge of policy. If the whole country has to wait for Whitehall to adapt valuable learning could be stifled. Similarly, it would be damaging if the NDMPs entirely blocked the development of progressive policy. The upshot is that NDMPs must provide a floor, rather than a ceiling, for standards on issues like climate change.

Third, NDMPs should not cover anything which would impinge on development viability, because this varies so much across the country.

Fourth, we are concerned that the NDMPs may undermine strategic planning at Combined Authority level and in Greater London, and disincentivise the further take up of such powers. We propose that Combined Authorities which take on statutory planning powers as part of their devolution deals (such as Liverpool City Region, Greater Manchester and the West of England) should be able to 'opt out' of the application of the NDMPs.

The RTPI will shortly publish detailed research done by the University of Liverpool, which examines the role of national policies in different countries' planning systems. We would be happy to share and discuss this with the government.

50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

There needs to be a clear process setting out when and how NDMPs are reviewed.

There is a need for clarity regarding how they will be evidenced, the form which they will take, the extent of consultation, how inspectors will treat these policies, and how they will integrate with the existing hierarchical structure of the planning system.

51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Only if they are subject to appropriate levels of public consultation and parliamentary scrutiny, as noted above .

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

Topics which should be considered include:

- Heritage and conservation
- Greenbelt
- Flooding
- Energy
- Health and wellbeing
- Approaches to ageing populations
- Broadband
- The operation of How planning obligations and developer contributions work

Questions from 'Chapter 11 – Enabling Levelling Up'

53 What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

The 12 Levelling Up missions outlined in the Levelling Up White Paper cover a broad range of topics and objectives which, if achieved, would deliver significant benefits across the nation. Planning should be seen as an enabler for many of these missions, acting as a driving force for sustainable development and in turn sustainable growth.

Home ownership

The tenth mission states that 'By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas'.

The proposals in this consultation are, overall, likely to make this mission harder to achieve. We expect the proposals to further reduce the amount of homes delivered across England because they fundamentally upset the checks and balances that underpin our planning system, and reduce incentives for local leaders to make the case for new developments, even when they would be in the wider public interest.

We give suggestions on how the government could address this problem in our replies to the questions under Chapters 3 and 4 of this consultation.

Improved transport networks

The third mission outlines plans for local public transport connectivity to strive to be at the level of London's throughout England. Planning has a central role to play in delivering this, shaping both where we live and how we travel. The key to delivering connectivity is through the bridging of transport and land-use planning, two elements of planning which have often operated in silos.

Strategic planning approaches, such as our proposal of [Green Growth Boards](#) and the cooperative approach taken by Greater London with TfL, and some Combined Authorities, demonstrate how such cooperative approaches to planning may be undertaken more effectively.

Our [Net Zero Transport](#) report also outlined the role that increased connectivity, through active travel and public transport, can have in decarbonising transport whilst also delivering healthier and greener communities

R&D

Another of the Levelling Up missions outlined plans for a 40% increase in domestic R&D investment outside of the South East. If we are to achieve this ambitious target for R&D investment, more research facilities (e.g. lab spaces and R&D centres) will need to be delivered. Planning must play a critical role, helping to streamline the process whilst also steering the location of these facilities. These centres should also be focused near leading higher education facilities that can offer both efficient transport links and capacity for development.

Health & Wellbeing

The seventh mission outlines plans to reduce the gap in health life expectancy, with those living in the highest health decile currently experiencing 10.6 years more good health than those in the lowest decile. An individual's living conditions are integral to their health, from the quality of their home, to the air quality and access to green spaces. [Planning has a significant role to play](#) in securing and safeguarding high quality environments, and therefore decreasing health inequality. Consequently, the NPPF should focus upon improving the quality of homes, reducing pollution, improving air quality and promoting green spaces and active travel to help reduce health inequalities.

Pride in Place

The ninth Levelling Up mission focuses on increasing the pride local people have for their communities. Increasing pride in place can come through enabling regeneration projects and helping to shape greener and healthier communities. In order to ensure that places reflect the communities that they serve, Local Authorities must undertake robust and open engagement to help increase/enhance/strengthen local people's involvement with the changes in their community. Neighbourhood planning, if properly resourced, could play an effective role in this.

54 How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

The framework can better support development, drive economic growth and productivity by understanding and acting on the clear link between planning and growth. Planning must be understood as an enabler for growth and positioned as such through a variety of changes.

A clearer focus upon strategic planning would help LPAs to link their plans, establishing efficiencies and enabling a greater scale and security in the delivery of housing and infrastructure. The framework could better support strategic planning by incentivising cross boundary cooperation, however the removal of the duty to cooperate will likely have an inverse effect.

Infrastructure is rightfully understood to be one of the most significant drivers of economic growth, with renewable energy and transport projects delivering significant growth across the economy. However, the [government's own data](#) suggests that [the current timespan for the DCO process is up 65% since 2012](#). These delays to the process not only slow down economic growth and productivity but they also have significant knock-on effects in the efforts to combat climate change and the Levelling Up Agenda.

The framework should explore how the DCO process can be streamlined in order to deliver economically and environmentally beneficial projects such as offshore wind farms and railways. These projects not only help to drive economic growth but they also play a key role in Levelling Up various communities across England due to their varied locations.

Finally, the framework can help to drive economic growth and productivity through investment in the development of science and technology. Science and technology are one of our nation's greatest exports and we must continue to incentivise investment and development within these sectors by facilitating their growth. This could be done by streamlining the planning process for labs and R&D hubs to allow the sectors to move at the same pace as the technological change that drives it.

These policies should also be focused towards areas that have both the foundations to facilitate technological growth and, crucially, the capacity to deliver the required housing and infrastructure.

55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

It was widely felt across our membership that some of the government's changes to the NPPF conflict with the desire to increase development on brownfield land and the facilitation of 'gentle densification'. The removal of the need to review the Green Belt alongside the need for densification to respect local character, place a number of obstacles in the way of development in urban areas. By removing incentives to review Green Belts and creating obstacles to densification, the NPPF is leaving little option for the largest towns and cities to meet their urban uplift targets. Whilst developing brownfield sites is often positive, there is a limited supply of these sites and we should not focus solely upon them.

Strategic planning is a potential solution to this issue, helping to establish a broader approach to development outside of the boundaries of a single Local Authority and deliver housing at a more appropriate level. As we have argued throughout this consultation response, in order to deliver this, Homes England would need to align with these strategies and, alongside the government, deliver a national programme for densification in urban areas.

56 Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?

Yes, absolutely. But this should be done through the lens of planning for *inclusive* environments that enable all to flourish. The government has a responsibility to take into account the needs of different individuals and groups, and to ensure that planning effectively for them leads to high-quality places which all people can enjoy. The healthy, resilient, and enjoyable environments which this would produce are likely to have huge and wide ranging benefits for productivity, resilience and the health system.

There is a growing body of research from academia and the charity sector which government can draw on to pursue this agenda, for example, that produced by [Make Space for Girls](#), [the TCPA](#) and [the RTPI](#)).

However, it is important to note that the key barriers to planning for under-represented groups are not necessarily linked to a lack of national policy, but rather local under-resourcing, a lack of awareness of best practice, and siloed policy making at various levels of government. Addressing these issues should accompany new national policy.

Questions from 'Chapter 13 – Practical changes and next steps'

57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

Some of our members suggested that an online version of the NPPF which tracked changes between versions in a similar way to legislation on legislation.gov.uk would make cross-referencing different versions easier.

58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

As we have outlined in our response to previous questions, we believe that the overall effect of these proposals is likely to reduce the delivery of new homes in England. The provision of affordable housing may be particularly affected, as will specialist housing, such as homes for those who are elderly and disabled. Yet, with the ageing population in England, paired with the current stresses on the NHS, the urgent delivery of specialist housing is [projected to increase over time](#).

Overall, the changes to the NPPF do not help drive forward the issue of equality within housing or wider issues of planning. We would urge the government to review the effect of these policies and question whether there are alternatives to help deliver equality.