

**Subject:** Suggestions for Changes to the NPPF

**From:** Michael Bach <michaelbach@madasafish.com>

**Date:** 02/10/2017 19:46

**To:** Steve Quartermain <steve.quartermain@communities.gsi.gov.uk>

**CC:** Peter Eversden <london\_forum@blueyonder.co.uk>, Mark Plummer <mark.plummer@communities.gsi.gov.uk>

Dear Steve,

As promised, Peter and I have presented you with a varied menu for changing the NPPF from the radical to minor changes to the order and content and a set of changes often from a London-specific view point.

We strongly favour the NPPF becoming more positive and proactive about planning **for** development than being predominantly about process and development management. We specifically favour developing a spatial planning dimension so that it is about a more sustainable pattern of urban development, about towns and cities, identifying what patterns are more sustainable whether at the strategic level (urban infill, urban extensions and, perhaps, large new settlements) and greater emphasis on sustainable neighbourhoods/communities. It needs to planning for urban growth, choosing the right places to put the right housing, and ensuring that we are creating or maintaining healthy communities with easy access to a wide range of local social infrastructure.

We have proposed specific changes for the various sections, especially:

- **Town centres** – maintaining offices, changing the requirement to identify 15 years' supply of sites for town centre sites, when we only require 5 years' supply for housing which has a wider range of sites to choose from, reassess how to deal with large-scale out-of-centre schemes which have been bundled together to circumvent the policy
- **Housing:** Choose sites that are in locations that have access to public transport and local social infrastructure; identify objectively-assessed need (OAN) for different housing/household types; We **object** to the LPEG proposals for a standard, one-size-fits-all approach to identifying OAN – we consider that the GLA requires a different process as its housing targets are capacity based, after mediating between need based on a sophisticated SHMA and capacity on consensus-based SHLAA.
- **Placemaking and Design:** this needs to put placemaking in a more central role
- **Loss of local facilities:** This needs to be updated based on creating/maintaining sustainable neighbourhood/communities, taking on board assets of community value and planning positively for accessible local social infrastructure including shops, primary school, GP surgery, etc
- **Neighbourhood planning/neighbourhood plans:** Based on our experience in London we reject the LPEG proposal to limit the content of Local Plans to strategic matters, leaving the "detail" to neighbourhood plans. This is totally inappropriate in London where the Local Plan needs to have a wide range of policies, mostly Borough-wide, and also because we could wait a generation to get "full coverage"

We hope that you will find some ideas for changing the NPPF – after 5 years experience of using it, 5 years of significant change – the document needs more than minor tinkering – it needs greater coherence, internal consistency and better understanding of the damage that "one-size-fits-all" changes have had to places like London.

Peter Eversden  
Chairman  
London Forum of Amenity and Civic Societies

Michael Bach  
Chairman: Planning, Environment and Transport Committee

— Attachments: —

NPPF SUGGESTIONS FOR CHANGE.docx

138 KB