

10 May 2018

Dear David,

LONDON FORUM'S COMMENTS ON THE DRAFT REVISED NPPF

We attach the London Forum's comments on the Draft Revised National Planning Policy Framework.

Following our discussion yesterday, we have included below a proposal to restructure the document, plus some paragraphs to provide improved continuity, so that there is a stronger storyline and a goal/aim that relates to the role of planning – to promote a more sustainable pattern of urban development. This is mainly a repackaging of the existing material to create a more coherent story.

Clearer storyline and structure

The NPPF needs a much stronger storyline or leitmotiv.

The purpose of the document seems to be to promote a more sustainable pattern of urban development, to accommodate objectively-assessed need for all types of development and to ensure that it secures the right development in the right places.

To achieve this strong central message, we have suggested that the structure could be changed – see Annex 1.

We discussed the need to elaborate on the points about promoting a more sustainable pattern of development and what promoting the right development in the right place would mean – these have been incorporated in our main comments, but are repeated below in Annex 2.

Implications for London

Since our main area of interest is the implications of the NPPF for London, we are particularly concerned about what the document says about:

- **housing need and housing delivery** – we are unclear whether there is an understanding of the way need and capacity are reconciled within the London Plan, and how land supply constraints and the lack of any control over delivery could be prejudicial to proper planning in those boroughs under pressure
- **parking standards** – London has had maximum parking standards since the late 1960s – proposals that these should be discouraged (para 107) would be prejudicial to proposals for raising densities in highly accessible locations, undermine affordability and reduce the ability to support local public transport and to promote a major shift toward more sustainable means of travel.

With regard to design, the document has no references to placemaking, tall buildings, and their impact on townscape, the community and the urban skyline.

The document does not recognise that London and other major cities need recognition, rather than just refer to “exceptional circumstances” to “standardised” approach to delivering more sustainable patterns of urban development. London is perhaps fortunate to have the London Plan – a spatial development strategy – which does articulate what a more sustainable pattern of development would look like and how getting the right development in the right place would work.

We hope that these comments will improve both the storyline and the message of the revised NPPF.

Best wishes,

Peter Eversden
Chairman

Michael Bach
Chairman: Planning, Environment & Transport Committee

London Forum of Amenity and Civic Societies

Cc Steve Quartermain
Michael Bingham
Ashleigh Cook

ANNEX 1: SUGGESTED CHANGES TO THE STRUCTURE OF THE NPPF:

It needs a clearer structure to:

- say in terms in the introduction the central message and how it will be presented, to create a stronger outline;
- **split the document into three clear sections:** principles (chapter 2), process (chapters 3 and 4) and planning policies (5-16);
- have a short section at the end of chapter 2 on getting the **right development in the right place** to introduce the main thrust of the document;
- Plan-making: expand to include:
 - Effective use of land
 - Design
- **reorder the planning policy chapters** into:
- **Proactive Planning**
 - Housing
 - Town centres
 - Economic development
 - Communities
 - Transport - although location/accessibility issues should be dealt with by right development in the right place
 - Communications
- **Policy constraints** (or some better term):
 - Green Belt
 - Climate, flood coast
 - Natural environment
 - Historic environment

The mineral chapter could be deleted from this document as it is specialised and does not relate to anything else in the document.

ANNEX 2: Sustainable development or a more sustainable pattern of urban development?

Whilst sustainable development is a goal, in operational terms for planning it is about getting the right development in the right place. If we only add 1% per year to our developed area, where that development goes and the form that it takes has the potential to improve the sustainability of our patterns of urban development or, if we allow development in the wrong places, to make the pattern less sustainable.

The NPPF should interpret sustainable development in spatial terms as getting the right development in the right place and then to spell out what that means in terms of the selection criteria for allocating sites for housing, main town centre uses, especially economic uses, and community uses, with the aim of improving accessibility and reducing dependence on car use. These criteria are at present scattered around the document

The right development in the right place

To promote sustainable development the planning system seeks to achieve a more sustainable pattern of urban development by ensuring that right type development is encouraged to locate in the right places. To do this development plans need to identify/allocate sites which meet the appropriate selection criteria.

Housing sites should meet the following criteria:

- a) be accessible by a choice of means of transport, especially public transport, to ensure accessibility to jobs, shops, leisure, education, health, etc;
- b) have easy access to a wide range of local services, amenities and local social infrastructure, such as local shops, a primary school, a GP surgery, a local park; and, where appropriate
- c) reuse previously-developed land;
- d) new housing development and social infrastructure should be coordinated; and
- e) encourage development that would be compatible with local character and context.

These selection criteria should be used for identifying sites in local plans, but any sites brought forward by developers outside this process will also need to meet the same criteria to ensure that new developments contribute positively to achieving a more sustainable pattern of urban development.

Employment sites should meet the following criteria:

- a) be accessible by a choice of means of transport, especially public transport;
- b) for more intensive employment uses, such as offices, be located within town centres or close to public transport interchanges; and
- c) reuse previously-developed land.

These criteria should be used both for identifying new sites and for reassessing land currently allocated for employment uses.

Town Centres:

Main town centre uses, such as shops, leisure, entertainment, offices, arts, culture and tourism, should wherever possible be located and retained in town centres. If developers propose to develop sites outside town centres, they will need to demonstrate that they could not find a more central and suitable site that could be available within a reasonable time period.