

Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (*)

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Please select an item from this drop down menu

If you are responding on behalf of an organisation, please select the option which best describes your organisation. *

Trade association, interest group, voluntary or charitable organisation

If you selected other, please state the type of organisation

Click here to enter text.

Please provide the name of the organisation (if applicable)

Living Streets

Chapter 1: Introduction

Question 1

Do you have any comments on the text of Chapter 1?

An over-riding objective of the National Planning Policy Framework (NPPF) should be to reduce greenhouse gas (GHG) emissions, especially from the transport sector. The Committee on Climate Change (CCC) highlighted that the UK is not on course to meet the GHG emissions reductions set in its 4th and 5th carbon budgets, underlining the need for stronger measures. Planning policies have a crucial role in reducing the demand for travel and GHG emissions.

Paragraph 6 states that Ministerial statements and NIC-endorsed recommendations may be a "material consideration" when preparing plans or deciding applications. They should not be able to override key sustainable development requirements such as the promotion of healthy communities and prioritising sustainable transport. We therefore propose adding the words "where these are compatible with other NPPF policies." at the end of the paragraph.

Chapter 2: Achieving sustainable development

Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

Not sure

Please enter your comments here

We support sustainable development. In the context of place-making this must be based on the integration walking and cycling, public transport and reducing car dependency in urban regeneration, and in the selection of new development sites and their layout. This is in recognition of the need to reduce harmful greenhouse gas emissions from motorised transport.

Question 3

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

Not sure

Please enter your comments here

No comment.

Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

No comment.

Chapter 3: Plan-making

Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

Not sure

Please enter your comments here

No comment.

Question 6

Do you have any other comments on the text of chapter 3?

We support the proposal in paragraph 34 that "Plans should set out the contributions expected in association with particular sites and types of development" – for example, towards the development of local walking and cycling networks. Such contributions should be directly linked to the communities where the development is taking place – otherwise they are unlikely to see the benefit and more likely to oppose it.

Chapter 4: Decision-making

Question 7

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

Not sure

Please enter your comments here

We support the principle of an open approach.

Question 8

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

Not sure

Please enter your comments here:

No comment.

Question 9

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

We support the use of review mechanisms to capture increases in the value of large or multi-phased developments – through increases in developer contributions (e.g. towards the Community Infrastructure Levy or Section 106).

Question 10

Do you have any comments on the text of Chapter 4?

We support the principle of agreeing infrastructure associated with new developments at pre-application stage (paragraph 42) as long as that this is in line with the priority for sustainable transport set out in paragraph 103. Sustainable transport must be integral to new developments and not an optional extra. Therefore paragraph 42 should be amended with the insertion of 'sustainable transport' after the word infrastructure "infrastructure, sustainable transport and affordable housing".

Essential sustainable transport infrastructure may lie outside the site boundary, therefore the words "and/or its sustainable transport links" should be added to paragraph 57b.

Chapter 5: Delivering a wide choice of high quality homes

Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

No comment.

Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

Not sure

Please enter your comments here

No comment.

Question 13

Do you agree with the new policy on exception sites for entry-level homes?

Not sure

Please enter your comments here

No comment.

Question 14

Do you have any other comments on the text of Chapter 5?

No.

Chapter 6: Building a strong, competitive economy

Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

Not sure

Please enter your comments here

We support the intention that planning policies and decisions must support the retention and development of accessible local services and community facilities (paragraph 84d). The list should be amended to include schools “such as local shops, primary schools, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”

Question 16

Do you have any other comments on the text of chapter 6?

No further comment.

Chapter 7: Ensuring the vitality of town centres

Question 17

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

Yes

Please enter your comments here

We support paragraph 87 requiring local authorities to apply a sequential test to planning applications for main town centre uses, then edge of centre locations.

Question 18

Do you have any other comments on the text of Chapter 7?

Investing in walking, cycling and public transport contributes to town centre regeneration. Therefore, we recommend adding the following point to paragraph 86: "Ensure that town centres encourage and enable access walking, cycling and sustainable transport."

Chapter 8: Promoting healthy and safe communities

Question 19

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

We strongly welcome this new chapter especially paragraphs 92 and 93.

We would like to see two amendments to paragraph 92c:

- delete "especially where this would address identified local health and wellbeing needs" because all communities would benefit from this policy, and;
- add "primary schools" to the list. This supports the Government's Cycling and Walking Investment Strategy target to ensure that at least 55% of primary school children in England walk to school by 2025.

We welcome the promotion of rights of way in paragraph 99.

Question 20

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

No further comment.

Chapter 9: Promoting sustainable transport

Question 21

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

Not sure

Please enter your comments here

We strongly welcome paragraph 103, in particular point c that “opportunities to promote walking, cycling and public transport use are identified and pursued” and point e “patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”.

We welcome paragraph 104 statement that the planning system should manage patterns of growth and that significant developments should be focused on areas that are or can be made sustainable. However, we do not agree with the distinction between urban and rural locations. Significant developments should not be considered in rural areas unless there is scope to provide sustainable transport options. Otherwise the planning system will be promoting more car dependency.

The emphasis in paragraph 105d on providing high quality walking and cycling networks is very welcome.

Replace “if” with “when” at the start of paragraph 106 and delete the first sentence of paragraph 107. Local authorities must be free to set maximum parking standards as they see fit. These are an important tool for delivering the aims of the NPPF to maximise the delivery of new homes in appropriate locations, by supporting the sequential delivery of sites, encouraging densification, and making developments more acceptable to local communities by reducing parking pressures and traffic. This is reflected in paragraph 122 on making best use of land and promoting sustainable travel modes that limit future car use. Transport-led developments, for example, new homes and workspaces around railway stations, are designed to have low parking provision, in support of densification. It is important that this approach is supported throughout the NPPF. Social trends, particularly in urban areas, show falling car use and car ownership and a fall in driving licence takeup. It is reasonable to allow local plans to reflect this in setting parking standards for their areas.

We welcome paragraph 110, in particular giving priority first to pedestrian and cycle movements, but question its relationship to paragraph 109. All developments should seek to implement paragraph 110.

Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

Please select an item from this drop down menu

Please enter your comments here

No comment.

Question 23

Do you have any other comments on the text of Chapter 9?

[Click here to enter text.](#)

Chapter 10: Supporting high quality communications

Question 24

Do you have any comments on the text of Chapter 10?

No comment.

Chapter 11: Making effective use of land

Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

Not sure

Please enter your comments here

We support policies to make effective use of land, especially where this is in short supply. However, there must be some scope within the NPPF to protect land around transport hubs against future need. For example, for public transport infrastructure and multi-modal transport interchanges needed to support the transition to a low carbon future.

Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

Yes

Please enter your comments here

We strongly support the policy of employing minimum density standards to meet housing need where there is scope to limit car use – by promoting walking, cycling and public transport use. However, this aim needs to be supported by giving local authorities the ability to introduce parking standards aimed at restraining demand for motorised traffic - see comments on paragraphs 106 and 107.

Amend paragraph 123a to read “These standards should seek a significant uplift in

the average density of residential development within these areas, including setting maximum parking standards, unless it can be shown that there are strong reasons why this would be inappropriate”.

Question 27

Do you have any other comments on the text of Chapter 11?

No further comment.

Chapter 12 : Achieving well-designed places

Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

The emphasis on place-making and good quality design is very welcome. This chapter should acknowledge that designing public realm for active travel creates attractive and sustainable places – and supports the Government’s ambition that walking and cycling should be the norm for short journeys.

Question 29

Do you have any other comments on the text of Chapter 12?

Under para 124 we would change “ high quality buildings and places” to “high quality buildings, infrastructure and places
Under para 126e we would change “transport” to “sustainable transport”.
Under para 126f we would change “accessible” to “accessible by active travel”

Chapter 13: Protecting the Green Belt

Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are ‘not inappropriate’ in the Green Belt?

Not sure

Please enter your comments here

Amend paragraph 136b “well served by public transport, walking and cycling”. Also paragraph 137 should read “where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and is or can be well served by public transport and active travel.

Question 31

Do you have any other comments on the text of Chapter 13?

No further comment.

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

Question 32

Do you have any comments on the text of Chapter 14?

We welcome the Government's statement that the planning system should support a transition to a low carbon future. However, the NPPF is weak on tackling the impact on climate change from transport. Paragraph 147 should include the addition "support the use of low carbon transport and associate infrastructure, and reduce the overall need to travel".

We support the inclusion of sustainable drainage systems (SuDS) in paragraph 163. This should become the norm for all developments both as a climate change mitigation measure and as part of achieving well designed places.

Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

Please select an item from this drop down menu

The opening words of paragraph 149b "can help to reduce" should be replaced with "seek to minimise". The paragraph should also be strengthened to say "location (including access to sustainable transport options)"

Chapter 15: Conserving and enhancing the natural environment

Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

Please select an item from this drop down menu

Please enter your comments here

We welcome aligning the NPPF with the goals of the 25 Year Environment Plan, in particular achieving targets on clean air. We strongly support paragraph 179 requiring development plans to be aligned with air quality plans, and the role of traffic management in making a positive contribution to such plan.

Question 35

Do you have any other comments on the text of Chapter 15?

No further comment.

Chapter 16: Conserving and enhancing the historic environment

Question 36

Do you have any comments on the text of Chapter 16?

No comment

Chapter 17: Facilitating the sustainable use of minerals

Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

No comment

Question 38

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

Not sure

Please enter your comments here

No comment

Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

Not sure

Please enter your comments here

No comment

Transitional arrangements and consequential changes

Question 40

Do you agree with the proposed transitional arrangements?

Not sure

Please enter your comments here

No comment

Question 41

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

No comment

Question 42

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

No comment

Glossary

Question 43

Do you have any comments on the glossary?

No comment