Consultation response

Proposed reforms to the National Planning Policy Framework and other changes to the planning system

September 2024

Summary

Green Alliance supports the government's aspiration to update the planning system to enable more homes to be built at pace to tackle the housing crisis, while achieving positive outcomes for nature, climate and public health. Below are Green Alliance's key priorities relating to proposed changes to the NPPF.

- Building on the Green Belt is not a panacea for solving the UK's housing crisis. It risks creating developments of low density sprawl that are reliant on private car use. A better alternative would be to densify towns and cities with 6-7 story buildings as seen in some UK and European cities, giving residents a connected community with access to amenities and public transport.
- Significant new road development for new housing should be avoided where possible. New roads yield poor value for money and undermine the government's environmental and transport goals by increasing traffic demand, air pollution and carbon emissions.
- The NPPF should have a more integrated spatial planning approach on transport. Creating cycle lanes and pavements are important but not sufficient. In addition, a minimum standard for transport infrastructure is required, as well as limits on car parking.
- We welcome the focus on tackling climate change. Specifically, we recommend removing the presumption in favour of oil and gas infrastructure and ensuring that new homes are future proofed, for example by providing access to electric vehicle charging infrastructure and building in resilience to withstand and adapt to a changing climate.

- We support increasing the threshold for wind and solar developments before entering the NSIP process, to speed up delivery.
- It is essential that the NPPF maintains levels of protection for nationally significant nature sites and species while promoting uptake of new mechanisms such as Biodiversity Net Gain and a more strategic approach to nature recovery modelled on the Lawton principle of connectivity.
- The definition of "grey belt" is too vague. Developing a lot of Grey Belt land will degrade the Green Belt, undermining its openness.
- Weakening the exceptional circumstances test for redrawing Green Belt boundaries risks undermining the Green Belt's purpose to support urban regeneration.

Q4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Yes. Compared to other European countries, British cities are low density, impacting the way we live and travel. In Britain's large cities only 40 per cent of residents can reach city centres by public transport within 30 minutes, compared to 67 per cent in equivalent European cities. This is not due to the size of public transport networks, as in many comparable European cities they cover a similar or smaller area than British cities. The difference is density. Fewer people in British citizens live near to public transport because housing is predominantly low rise, unlike the midrise form more common in Europe. The increase in car ownership in the UK has enabled the growth of suburbs, as much longer distances are commutable daily.

Low density development also makes active travel much less viable. People are unable to live within a reasonable walking or cycling distance to jobs, shops or green spaces, and they have to contend with the higher volumes of car traffic which accompany low density living.

Increasing density will result in lower emissions from domestic energy consumption. For example, flats have almost three times lower annual carbon emissions than a detached house because of shared walls which reduce heat loss.

Higher density does not necessarily mean high rise. Some tall blocks set in large areas of open space may not even be as dense as traditional terraced streets. Apartment blocks in cities such as Paris and Barcelona provide historic examples of successful higher density living. In these cities, buildings do not typically rise above five or six storeys and achieve high densities while maintaining pleasant living environments. In the UK, older developments built at higher densities are often seen as desirable today.

In some instances, high rise buildings will have a role to play in increasing density, particularly very close to city centres or where sites are not economically viable without the inclusion of significant numbers of dwellings at height.

Many locations preferable for housebuilding are in low rise, suburban neighbourhoods served by a train station. Increasing density is likely to mean changing the character of some of these suburbs. But the character of cities and towns should naturally evolve as the needs of the population change.

Q5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes, we agree that increasing the density of housing is necessary and would bring many benefits including requiring less land space, reducing properties' emissions and lowering energy demand. However, we would recommend development in existing urban areas where possible, to avoid low density sprawl, where access to public transport and other public service infrastructure is unlikely to be within reasonable walking and cycling distance.

Q21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of Previously Developed Land (PDL) in the Green Belt?

It is regrettable that the stress on meeting an identified need for affordable housing has been lost. We understand the imperative of building more

homes of all sorts, but previously developed Green Belt land could be returned to nature, rather than built on. If it is to be developed for housing, priority should be given to providing smaller, affordable homes, rather than larger, more expensive homes.

Q24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

The definition of grey belt is so vague that it is hard to answer this question. It is not clear in what sense degraded land within the Green Belt fails to meet the five purposes of the Green Belt e.g. checking sprawl or assisting in "urban regeneration, by encouraging the recycling of derelict and other urban land" (if land in the Green Belt can easily be developed, it is less likely that derelict and other urban land will be developed). It is unclear how landowners will be prevented from running down the quality of Green Belt land in order to see it reclassified as "grey belt" and thus open to development. And once "grey belt" land is developed for housing, it will not be possible to use it for other purposes (in the past, previously developed land within the Green Belt has been repurposed for nature and amenity, as with the Thames Chase Community Forest and the Mersey Forest).

Q25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

As above, if land within the Green Belt cannot be developed, it is likely to push development into existing settlements. This helps deliver the fifth purpose of the Green Belt. As well as regenerating towns and cities, it helps densify them, increasing their environmental sustainability. Green Belt land by its very nature also helps meet the other four purposes of the Green Belt, even if it is of lower quality.

We recognise that much Green Belt land is currently lost to development and that there is a great pressure to provide more sites for development, particularly as house builders would sooner develop within the Green Belt than on difficult brownfield sites within cities. There is value in clarifying the circumstances in which developing land within the Green Belt might be

necessary to meet housing need. But the premise of “grey belt” land is very questionable. Further guidance and a much better definition should be included within the NPPF.

Q26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

As set out above, we do not believe that the guidance helps in this respect.

Q28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No.

Q30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Piecemeal development of Green Belt land undermines its purposes and is too common. We understand the desire to clarify the circumstances in which such development might be permitted, though we do not believe the draft provides the necessary clarification. If Green Belt land is to be developed for housing, our preference would be to focus on strategic release of larger sites. These could provide large numbers of new homes, including affordable homes. Land value capture should ensure the quality and sustainability of these new urban extensions.

Q36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

If the planning system is to support climate change targets, aid nature’s recovery and promote public health, a broader reimaging of where homes should be built and at what densities is needed.

The guiding principles should be to build new homes of higher densities in and around urban areas, with good public transport access and provision for active travel, and with key destinations within walking distance. This would lead to more homes being built while requiring less land for car parking, allowing more spacious dwellings and the creation of nature rich spaces. It would also generate less motor vehicle traffic, reducing air pollution and congestion and improving safety for pedestrians and cyclists.

Protecting and restoring nature and providing public access to green space is fundamental. Previous governments created measures like the Green Belt to prevent urban sprawl, designated sites to protect important habitats and species and, more recently, introduced policies to restore and rebalance nature such as biodiversity net gain and local nature recovery strategies. Changes to the NPPF should set a firm direction of travel so that future house building supports nature's recovery, for example by avoiding sites that are protected for their national or international significance and mandating the incorporation of nature rich spaces in new developments.

New design principles should ensure that new towns are not overly dominated by road transport infrastructure, and instead are geared towards more nature-friendly, air quality-friendly infrastructure such as cycle pathways and bus routes. To achieve this, the NPPF should foster developments that are in walkable, wheelable and cyclable proximity to shops and services, transport hubs and green spaces.

We agree with the assertion that any development on released green belt land must bring clear benefits, not only via mandatory Biodiversity Net Gain, but also through new rules that will secure improved access to good quality, nature rich green space. We are pleased that the proposals propose that "new residents should be able to access good quality green spaces within a short walk of their homes" but would like an explicit commitment to a metric of green space.

Q67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF? We propose to add to the wording in NPPF paragraph 100 to make clear that significant weight should be placed on the importance of facilitating new, expanded, or upgraded public service infrastructure when considering proposals for development.

New, expanded or upgraded public service infrastructure will be needed for new developments. However, large scale road projects have a low benefit cost ratio in comparison to public transport investment. For example, the Department for Transport's own assessment suggests a benefit cost ratio for the Lower Thames Crossing of 1.46, significantly below comparative investment in bus priority measures, which is 4.2.

Transport is the UK's highest emitting sector. Most emissions are generated from surface transport, the tailpipe emissions from fossil-fuelled road vehicles. Expanding the roads network would exacerbate these emissions as evidence demonstrates new roads increase traffic volumes and emissions.

Q69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

While the reference to "vision-led planning" is helpful, the NPPF should define what type of "vision" this to support local authorities to clearly and consistently interpret its meaning. The vision should be one which supports the Environment Act legally binding targets for reducing air pollution, as well as national and international obligations to reduce climate emissions, aiming for a no net increase in motor traffic, and for most development to be concentrated in Principal Urban Areas.

The vision should therefore support developments that (a) are concentrated in and around Principal Urban Areas; (b) have good provision for active travel, with key destinations (schools, shops, healthcare, public transport, green open space etc) within easy walking distance of people's homes; (c) have good public transport from the outset of the development; (d) are built to higher densities (e.g. mid-rise apartments); and (e) avoid devoting significant proportions of land to car parking.

Q70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Building at densities that allow access to amenities by walking or cycling distance will encourage an active lifestyle. By contrast, car dominated, low density sprawl breeds sedentary lifestyles and can have a detrimental impact on people's health. Creating communities where fewer cars are needed will

have the additional benefit of reducing localised air pollution, which would particularly benefit the health of children, older people and those with pre-existing health conditions. Doing so would have an immediate and positive impact on public health, lessening pressure on health and social care services and providing savings to the public purse.

When considering the health impacts of planning and policy changes, a particular focus is needed on health inequalities, which would help the government meet its mission of building an NHS fit for the future by preventing poor health outcomes.

Q73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes, we welcome the proposed changes.

Q74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

The government has committed to substantial amounts of peat restoration, including to deliver net zero. When drained for development these soils are such substantial sources of emissions that the priority from a net zero perspective should always be to rewet them. Putting solar panels on drained peatlands, rather than rewetting them, is highly likely to net increase emissions even accounting for the fossil fuels displaced by the generated clean energy. Rewetted peat is also a vital habitat for wetland species which are declining in both the lowlands and the uplands. We suggest therefore that there should be a general presumption against development on peat soils unless it is compatible with rewetting and does not detrimentally impact wildlife. This should be specified in the revised NPPF and any forthcoming guidance, for example in relation to nationally significant infrastructure projects.

Q75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Yes. Increasing the threshold for NSIPs will enable faster delivery of and increased capacity for renewable energy infrastructure, supporting the government's mission of becoming a clean energy superpower by 2030 and helping to achieve the UK's climate targets, which involve tripling the levels of renewable energy generation.

Q76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Yes. Increasing the threshold for NSIPs will enable faster delivery of and increased capacity for renewable energy infrastructure, supporting the government's mission of becoming a clean energy superpower by 2030 and helping to achieve the UK's climate targets.

Q78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

In this consultation, no changes have been proposed to policies dealing with onshore oil and gas which is disappointing. The current policy for onshore oil and gas still includes a presumption in favour ("plan positively for"). This needs to change. We suggest a presumption against permitting new oil and gas applications be included in the revised NPPF, with the following specific changes:

- The words "and plan positively for" should be removed from paragraph 221a and the policy changed to a presumption against permission.
- Paragraph 223 should also be revised considering recent court decisions such as Finch vs Surrey County Council Supreme Court. This highlighted that the full environmental impacts of a development should be considered, including scope 3 greenhouse gas emissions, and their impact on climate change and the UK's target to reach net zero by 2050.

In general, positive action to tackle climate change should be given greater weight in planning policy. For example, decisions to build on areas of Green Belt with limited access to public transport networks would undermine the government's aim of reducing emissions from the transport sector to meet net zero.

Where housing is built, the houses themselves need to be fit for the future, including changing weather patterns but also future demands, for example ensuring all new properties have access to electric vehicle charging infrastructure and are resilient to overheating during heatwaves.

Q80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

We note the establishment of a floods resilience task force which will provide a welcome focus in this important area. We suggest that national policy must provide strong steers on the need to increase the proportion of permeable surfaces in flood risk areas through both the choice of building materials and increasing green space, while stormwater harvesting mitigates flooding. As many floods concentrate around poorly maintained infrastructure, it is important that drainage and water infrastructure is built to a high standard and maintained well.

Specific adaptation measures for homes include the following.

- Impermeable surfaces should be directed away from homes, and green roofs and walls should be encouraged to reduce water runoff.
- Floodgates can be installed to reduce the amount of water that affect homes, businesses and other infrastructure.
- Plug sockets should be raised to secure power connections in at risk homes, and water resistant render can be installed to protect buildings.

Q81: Do you have any other comments on actions that can be taken through planning to address climate change?

The construction sector and its supply chains are significant contributors to climate change, with steel and cement currently two of the UK's biggest

sources of industrial emissions. It is vital that the government's plans for new infrastructure and homes are implemented with minimal impact on climate and nature goals and with circularity at their heart. The updated NPPF should draw lessons from the London Plan, which mandates carbon footprinting and circularity statements, and from the Part Z campaign on building standards. For more information, please see https://green-alliance.org.uk/publication/circular-construction-building-for-a-greener-uk-economy/

Similarly, there should be no airport expansions should be granted such as the proposals at Luton airport, as this is incompatible with the Climate Change Act 2008.

In addition, currently, planning permission and an environmental permit are needed only for agriculture developments that have capacity for over 40,000 poultry or 2,000 production pigs (over 30kg) or 750 sows. This refers to the number of animals per 'installation', or operating facility. These thresholds are incentivising developers to create more smaller operations, to fall outside the control of permitting and planning regulations.

The threshold should be lowered for poultry and pig installations, and explicit thresholds set for cattle and other forms of livestock to bring these facilities within the planning and permitting system, as per the recommendations of the Wildlife and Countryside Link briefing on reducing the harms from intensive livestock permitting here.

Q83: Are there other ways in which we can ensure that development supports and does not compromise food production?

Even with planned expansion, housing and infrastructure will remain minor uses of land relative to that needed to restore nature. The government must give adequate time and resource to support farmers in restoring nature. The government must also reconsider plans to expand bioenergy production. It should move away from existing biofuel policies, as these directly displace food production on a much greater scale than renewable energy, housing and the associated infrastructure. The Land Use Framework must set out a clear pathway to achieving the balance of land uses we need for food production, nature's recovery and climate mitigation, and crucially how farming policy and the farming budget will support that. Policies like

Biodiversity Net Gain will provide some private finance, but they will fall far short of the investment needed to deliver policies like 30 by 30, so the government must do much more to allow private finance to flow into nature restoration, including by expanding the Landscape Recovery scheme.

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