

RTPI members' views on proposed changes to the NPPF

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About the RTPI

The Royal Town Planning Institute champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

Background

On 22 December 2022 the government published the consultation 'Levelling-up and Regeneration Bill: reforms to national policy'. It proposes a wide range of reforms, some of which could have profound consequences for the housing crisis, sustainable development, and the overall shape of planning in England.

Since then, the RTPI has conducted 16 roundtables across all regions of England and with our specialist networks. Chartered Town Planners from across the public, private, and third sectors took part, as well as housebuilders, and we received a large volume of detailed written representations. Contributors had diverse views and experiences, which have informed the following response. It was finally agreed by the RTPI's England Policy Committee, a body elected by and made up of volunteer members, to advise the RTPI's Chief Executive on planning policy.

Immediate changes

In the first instance the government has proposed immediate changes to the NPPF, in particular on housing, but also on energy. We are concerned that some of these introduce greater uncertainty into the planning system and appear to be incompatible with the government's key policy objectives, from achieving net zero, to the delivery of 300,000 homes a year.

The planning system depends on an array of checks and balances to ensure that local decision makers plan for new developments that are in public interest. Taken together, these proposals aim to move the planning system away from a system of checks and balances which disincentivises the local under-supply of homes by reducing LPAs' control over new developments where this occurs. The government's reasoning appears to be that this approach has undermined community support for plans. This is a fair analysis: An overly technical and numbers-led approach to planning can indeed be damaging, and a genuinely plan-led system should be a key goal of planning reform. This is a very real challenge.

But we are concerned the proposed reforms do not replace these disincentives with new incentives for local decision makers to produce plans that meet local needs, or make the case for development where it would be in the wider public interest.

This compounded by the fact that the proposals introduce a set of policy objectives which appear to conflict, while failing to confront three key issues which are either crucial to solving the problems the consultation identifies, or – if not addressed – will undermine the proposals put forward. These are:

- **Resourcing:** Serious levels of under-resourcing in many local authorities;
- **Strategic planning:** A general lack of a strategic – i.e. larger-than-local - approaches to planning for housing, infrastructure and other interlocking policy issues; and
- **Leadership:** A lack of a clear commitment to using planning as a tool for genuinely engaged communities, local and national government, developers and other stakeholders to collectively respond to some of society's greatest challenges.

Transitional arrangements

The government has set out transitional arrangements to a new local plan system to be introduced after royal assent is given to the Levelling Up and Regeneration Bill (expected in May 2023).

This is welcome. But we are concerned that currently up-to-date plans that will reach the 'five year point' before the reforms are implemented will not qualify for any protection if they are assessed as needing to be revised. While they are unprotected it would not be possible to update them until there is certainty about the revised plan-making system. This has the potential to penalise positive, plan making, authorities who have a track record of getting a plan in place.

We are very concerned about the abolition of supplementary planning documents, which seems unnecessarily wasteful of public sector resources and would also require the involvement of the public in issues which have already been settled policy.

National Development Management Policies


The government has asked how its proposed National Development Management Policies (NDMPs) might be expected to work. This is a valuable exercise, and the RTPi has proposed some parameters within which the future NDMPs should operate. In particular, we feel that the scope of NDMPs needs to be tightly defined, and should not include any matters which impinge on scheme viability, or set new policy 'ceilings' that limit local innovation on issues like climate change.

Given the degree to which they will centralise power and change the way the system operates, the RTPi maintains that NDMPs, and any changes or additions to them in the future, should be fully scrutinised by parliament in a similar way to National Policy Statements.

The future of England planning policy

Finally, the government has used this opportunity to ask some very important questions about the future of England planning policy after the Levelling Up and Regeneration Bill gains royal assent. These include:

- Transport - assessing what changes are needed to reflect the government's commitment to encourage active travel through the 'Gear Change' programme, the forthcoming update to Local Transport Plans Guidance, any update to Manual for Streets and wider work to reduce carbon consumption from transport planning choices as set out in the Transport Decarbonisation Plan; and
- Implementing the commitment in the Levelling Up White Paper to bring forward measures to 'green' Green Belts, and to improve their environmental and recreational value.



However, we are concerned that putting this off until Autumn 2023 will be too late. Some of these wider questions, such as the long delayed amendment of the NPPF to put the climate emergency centre stage, are already seriously overdue.

In addition, we fear that the public will only be consulted in the style of the present consultation, which tightly circumscribes the scope for feedback on key issues, and that in the future we will be presented with a fully-formed suite of NDMP policies, plus a local plan manual, on which the scope for consultation will be limited.

We await future consultations promised by government and hope that Ministers listen to the sectors' advice, rather than making decisions privately before consulting experts and practitioners.

Final thoughts

The government has again missed a clear opportunity to lay out how the planning system can be proactively used to achieve its goals and those of society. The planning system is vital to achieving an expansion of good green jobs, to improving the quality of our towns and cities (which goes far beyond just making new buildings beautiful), securing a genuine and lasting nature recovery, and our collective response to climate change. Indeed, one of the RTPI's greatest concerns about this consultation is how little it says on this topic.

Whilst the government has built on its predecessors in encouraging devolution of decision making in a variety of policy areas to combined authorities, it has not gone far enough in making these institutions effective strategic planning entities. The price we are paying for this is delayed and inefficient decision making, and increasing frustration with development.