
Report to: Land and Assets Panel

Date: 20 April 2018

Subject: **National Planning Policy Framework Consultation Response**

Director(s): Liz Hunter, Interim Director of Policy and Strategy

Author(s): Alison Gillespie

1 Purpose of this report

- 1.1 To request that the West Yorkshire Combined Authority prepare a response to the National Planning Policy Framework consultation in partnership with Leeds City Region Local Planning Authorities (LPA).
- 1.2 To request the final draft of the West Yorkshire Combined Authority's response to this consultation be delegated to the Chair of the Land and Assets Panel for approval.

2 Information

National Planning Policy Framework (NPPF)

Content of the Consultation

- 2.1 On 5 March 2018 the Ministry of Housing, Communities & Local Government (MHCLG), formerly the Department for Communities & Local Government, published for consultation a draft revised National Planning Policy Framework (NPPF). Draft Planning Practice Guidance and the Housing Delivery Test: Draft Measurement Rule Book were also published for reference to support the NPPF consultation. **Appendix 1** is a summary of main draft revisions.
- 2.2 The NPPF sets out the Government's planning policies for England, how these should be applied and provides the framework within which locally-prepared plans can be produced. The proposed revisions to the NPPF constitute the first comprehensive update to the framework since it was first published in March 2012.
- 2.3 This consultation follows the consultation on the Housing White Paper (February 2017) and the consultation Planning for the Right Homes in the

Right Places (September 2017), both of which the Combined Authority submitted a response to in partnership with the Leeds City Region Planning Authorities.

- 2.4 The Combined Authority response to this consultation would focus on the strategic aspects of the draft NPPF and the implications of proposed policy changes. The response will be prepared in partnership with Leeds City Region Local Planning Authorities would cover the following matters:
- Plan-making: Statements of Common Ground and Tests of Soundness
 - Decision-making: Viability Assessments
 - Delivery a sufficient supply of homes: Standard methodology for calculating housing need and Affordable Housing Contributions
 - Ensuring vitality of town centres: Sequential approach
 - Promoting sustainable transport: Highway safety
 - Supporting high quality communications: Digital infrastructure
 - Effective use of land: Housing densities
 - Well-designed places: Utilising assessment frameworks
 - Climate change: Future resilience
 - Flooding: Cumulative impacts
 - Natural Environment: Responsibility for mitigating impact
 - Sustainable use of minerals
- 2.5 Many of the recommendations the Combined Authority made in the previous consultations detailed in para 2.3 have been reflected in the changes to the NPPF. For example, the proposed requirements for Statements of Common Ground to be based upon an area that reflects 'the most appropriate functional geography for gathering of evidence and the preparation of planning policies' takes into account previous responses which stated that the earlier approach was too restrictive. It is encouraging that the Combined Authority's feedback has been taken into account.
- 2.6 However, there remain a number of issues raised in previous consultations where the collective position still stands. For example it is proposed that the Combined Authority's response reiterates the position that the proposals for standardising the approach to assessing local housing need are welcomed in principle as this should streamline the process, saving time and resources. But it is proposed that the response reiterates concerns that the proposed approach directs growth towards areas of high demand / low affordability resulting in proportionally much higher targets in the south of England than the North. The implications of the methodology do not seem to support the commitment to rebalance the UK economy, wider northern growth aspirations and securing increased housing delivery nationally.
- 2.7 Our previously agreed response was to recommend that practice guidance makes clear that the housing need figure derived from the standard methodology provides a robust assessment of housing need from which plan makers should then take into account anticipated employment growth and the impact this has on the requirement for housing. It was suggested that that a clear methodology (or set of factors) for assessing employment growth / uplift

needed to be provided at a national level to ensure that the uncertainty currently experienced in identifying housing need is not replicated in applying employment growth factors. The Planning Practice Guidance will be reviewed to consider the extent to which these previous recommendations have been addressed.

Consultation Deadline

2.7 This consultation closes on 10 May 2018.

3 Financial Implications

3.1 There are no financial implications directly arising from this report.

4 Legal Implications

4.1 There are no legal implications directly arising from this report.

5 Staffing Implications

5.1 There are no staffing implications directly arising from this report.

6 External Consultees

6.1 No external consultations have been undertaken.

7 Recommendations

7.1 That the West Yorkshire Combined Authority prepares a response to the National Planning Policy Framework consultation in partnership with Leeds City Region Local Planning Authorities (LPA).

7.2 That the principles of the consultation response outlined in paragraphs 2.6 and 2.7 be endorsed.

7.3 That the final draft of the West Yorkshire Combined Authority's response to this consultation be delegated to the Chair of the Land and Assets Panel for approval.

8 Background Documents

None.

9 Appendices

Appendix 1 – Summary of National Planning Policy Framework – Draft Revisions