

**Summary briefing**

The National Planning Policy Framework (NPPF) had the stated twin goals of increasing localism (local control) and enabling economic growth. As a result it has a number of impacts on the ability of promoting strong and sustainable local economies through the planning system. Below is a summary of the findings of a longer Localise West Midlands paper on the implications of the NPPF for local economies.

- A strong in-principle emphasis on plans and decisions being responsive to local circumstance and able to incorporate local visions and priorities (para 10, para 17) but an inability to take both councils' and communities' time and money constraints into account to ensure this is justly deliverable.
- A vacuum in technical guidance and an impreciseness of language including key definitions that potentially increases likelihood of appeals and may increase the need for specialist legal and planning advice. This skews the planning process in favour of those with more financial or specialist resources.
- A short transition period damages local authority ability to be ready for the new guidance.
- A more permissive planning environment that while potentially removing some barriers to small enterprise is likely to also allow larger developments to damage local competition and supply chains in some sectors such as retail and local facilities that are crucial for inclusion and social justice.
- Relatedly, an obligation for local authorities to grant permission to developers where local plans are "absent, silent or relevant policies are out of date". As the majority of current plans are dated before 2004 this will lead to rapid updating of plans by already struggling local authorities, with likely consequences of poorer policies and inadequate community involvement; and to a major democratic deficit in planning decisions where the plan is not up to date.

**Retail**

- The NPPF contains several principles in support of town centres' viability, vitality and individuality. Putting these into practice, it retains the 'sequential test' of former retail policy (where development should be on the most central available site), but in requiring authorities to allocate enough sites to meet retail, leisure and office needs 'in full' the potential for edge- and out-of-centre development remains. The NPPF failed to include the Mary Portas recommendation to require Secretary of State sign-off for out-of-centre developments, or other recommendations to cap retail floorspace or allocate floor space percentages to independents. The presumption in favour of development also weakens the ability of authorities to reject damaging applications in some circumstances.
- The commitment of former retail policy to retain and enhance markets remains in the NPPF (para 23) but is a weak policy where the opportunity has not been taken to reverse markets' decline.

**Transport**

- The 'town centre first' approach takes one step to ensure minimisation of journeys and accessible development. Para 33 also states that "*Plans and decisions should take account of whether... safe and suitable access to the site can be achieved for all people*" but given the 'significant weight' to be placed on economic growth this 'taking into account' is potentially a weak factor in decision-making. In para. 35 a policy stating that "*facilities should be located within walking distance*" has the catch-all caveat "*where practical.*"
- The para 35 policy to site developments "*where practical to accommodate the efficient delivery of goods and suppliers*" has some potential for encouraging local supply patterns.
- The NPPF is weaker than former transport policy in that the emphasis on transport statements or assessments only for "*developments that generate significant movement*" (para 33) fails to define what is meant by "*significant movement*"; and not having the former policy's commitment to "*reduce the need to travel;*" but most of all in its para 32 policy that "*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*"

### **Brownfield development**

- The NPPF has core principle commitment to brownfield development (para 17 & 22). It also in para. 22 suggests local authorities “*avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose*”, removing one obstacle to brownfield development.
- However it is weaker than former brownfield policy in reducing restrictions on greenfield site use and in removing targets for brownfield use. The presumption and the emphasis on enabling economic growth will exacerbate this weakness. Another weakness is para 173 stating “*the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened*” which could potentially cause huge problems for authorities aiming to require responsible behaviour from developers regarding brownfield land and indeed other requirements.

### **Distribution of economic growth throughout the country**

- The NPPF, and the absence of former regional policy levels, results in a lack of vision and ability to address south-east-centric growth with its negative socio-economic consequences for south-east and other regions alike. Its emphasis on market-led planning and land prices is likely to exacerbate spatial inequalities, resulting in both deprivation and overheating effects.

### **Economic diversity and local distinctiveness**

- Planning policy to protect economic diversity and local distinctiveness were weak in former planning policy and remain weak in the NPPF, with limited references (para 60 referring only to architectural style rather than wider social and economic aspects and para 23 on town centre individuality). The retention of green belt policies have some positive implications for economic diversity and distinctiveness, but only of course in certain areas.

### **Housing and mixed communities**

- Para 50 of the NPPF commits local authorities to plan for a mix of housing needs, “*widen opportunities for home ownership and create sustainable, inclusive and mixed communities*”. Its “*garden city*” principles are also positive for inclusive housing. However, the NPPF no longer contains the former policy commitment to “*reduce social inequalities*” nor to use social inclusion as a criterion in identifying development sites. It also weakens the definition of affordable housing, linking it only to local prices and income rather than the ability of eligible households to afford it, and removes affordable housing targets.

In conclusion, in comparison to former planning policy the NPPF’s presumption in favour of development, primacy placed on economic growth, ambiguity of language and removal of some positive policies for redistribution and protected local economies, particularly in a context of resource-scarce local authorities, endanger many of its abilities to deliver on its own localism agenda and reduce the ability of the planning system to deliver flourishing local economies, and place power firmly in the hands of those with most resources – whether the wealthiest communities or the largest businesses. Its permissiveness potentially enables local authorities to be innovative in supporting local economies where there is the will and the resources to do so, and such opportunities although few need to be seized using inclusive local processes before other vested interests can take advantage.

*Localise WM*

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[www.localisewestmidlands.org.uk](http://www.localisewestmidlands.org.uk)

*This is a summary of a fuller briefing on the NPPF implications for the local economy available on LWM’s website.*