



Planning Policy Consultation Team

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Re: GHA response to the open consultation on ‘Proposed reforms to the National Planning Policy Framework and other changes to the planning system’

We are a signatory of the joint statement on climate change and planning led by Rights Community Action and agree that the three issues below should be prioritised as part of the government’s planning reform agenda:

- 1) The planning system must prioritise action on climate, and this should be articulated through a definition of the purpose of planning in the NPPF that reflects the crucial role of planning in securing our future in a changing climate;
- 2) The carbon impact of planning proposals must be accounted and inform planning decisions and plan making; and
- 3) The NPPF must be reviewed to give increased direction and urgency to the opportunities for planning and development to support resilience and adaptation.

The joint statement notes that detailed changes are required to make the NPPF fit for purpose in responding to the climate crisis including a presumption against all fossil fuel exploration and extraction and the reinsertion of encouragement for community led energy. We support the insertion of the wording (see below, in italics) after paragraph 8 of the current NPPF.

“Climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the principal concern for sustainable development. For the avoidance of doubt, achieving sustainable development includes securing the mitigation of, and adaptation to, climate change. All planning strategies, and the decisions taken in support of them, must reflect the ambition to help business and communities build a zero carbon future and prepare for the impacts of climate change. Accordingly, planning policies and all planning decisions must be in line with the objectives and provisions of Climate Change Act 2008 including the 2050 net zero carbon target.”

Rights Community Action, September 2024

Regarding the detail of the NPPF Consultation, re Chapter 2 - Policy Objectives we support moves to boost land supply, social rented and affordable housing and support cross-boundary collaboration for strategic planning, as well as the necessary energy infrastructure for our climate change target of Net Zero by 2050. Our individual member companies (including planning authorities) will respond with more detailed data and information to support specific policy recommendations; the following comments are overarching and highlight gaps and areas where GHA disagree or point to the need for further measures.

Re Chapter 3, questions 4 and 5: we believe a more cautious approach is needed where significant uplifts in density would result in out-of-character development in existing settlements. However, we support greater density in new communities, believing the housebuilder norm of ~35dw/ha is inappropriate where good transport connectivity is available and where more diverse tenure and housing typologies should be supported.

Re question 6, we believe the overarching principle of response to climate change as we set out above should be emphasised, as well as the need to consider locational and design policies which should follow suit. We also believe that planning policy must safeguard the natural environment, and an appropriate national land use framework should support all the development objectives but in lockstep with the conservation, recovery and enhancement of the natural environment including the provision of urban planting and open space (not only where Green Belt release occurs as question 36).

Re diversity of homes and high quality places, ref question 56, we support more community-led exception sites, provided connectivity and density are optimal. Re question 59 we support more nuanced definitions of beauty; indeed we strongly believe performance of new buildings is fundamental to the principle of well-designed places therefore local definitions need to include performance standards which are fit for purpose eg energy intensity in use fit for 2050 goals. Re questions 60 and 61 we do not believe the reference to mansard roofs is needed, and upward extensions need to be locally appropriate (see questions 4 and 5 response above). This also should apply to NSIP powers for critical economic development planning e.g. datacentres.

Re healthy communities we believe active travel should be supported so agree with question 69 proposals, also that performance of new buildings in relation to climate change is part of good design, so planning policy questions 70 and 71 must support more nature for ambient cooling, better connectivity and support for active travel and better resilience of buildings i.e. passive design for hotter temperatures. Related to this, we believe the National Model Design Code falls short of integration of climate mitigation and adaptation measures and needs further work in this regard.

Regarding questions 78 and 79, which are central to Good Homes Alliance members, all the above views are in support of improved mitigation and adaptation. We are on record as supporting local authorities' ability to set enhanced targets for Net Zero and climate resilience, as well as requiring further amendments to the Future Homes Standard to enable this (<https://goodhomes.org.uk/future-home-standard-response-1>).

Yours sincerely,

Lynne Sullivan OBE, Chair, Good Homes Alliance