



National Planning Policy Framework Document (December 2023)

From perspective of *WeCanMake*

General Position

This document is the revised publication in response to the *Levelling Up & Regeneration Bill: Reforms to National Planning Policy Consultation (2022)*. There are some positive steps forward. Nevertheless, the document still falls short of a national planning policy position that is fully supportive of the *WeCanMake* approach of community-led infill of existing urban and suburban areas.

The strategic aim of *WeCanMake* is to achieve a planning context that positively acknowledges this particular form of community-led development, especially the micro-sites which require residential plot sub-divisions and some rear garden development.

Supporting this form of development, in principle, will better enable its effective regulation under both national and local planning regimes. The alternative is a drawn-out process of negotiation and persuasion in relation to every planning application submitted, with the risk of a recommendation of refusal at the end of it.

At both national and local planning policy levels, the aim should be to galvanise support for soft densification through an appropriate degree of residential plot sub-division in low density suburban neighbourhoods (inter-war and post-war). This will generate micro-sites for the development of community-led and managed Affordable Homes in perpetuity. The sites will be developed in line with a community design code/guide where one has been prepared. This, in turn, assists in achieving optimum neighbourhood densities, offering a very sustainable model for making more efficient use of land without having to redevelop the existing built form.

An 'appropriate degree' of plot sub-division and neighbourhood densification will depend upon the capacity of local services and infrastructure, as well as a strategic desire to avoid the excessive loss of private green garden space throughout a neighbourhood. In relation to these and other material planning considerations, it is recommended that a *Planning Practice Note* be produced to support and elaborate the policy context. *WeCanMake* is in the process of putting this Practice Note together.

In this latest NPPF iteration, much of its essential content supports the above aims. There are however a number of relatively small, yet important, adjustments that would provide more explicit support for the *WeCanMake* model of urban and suburban community-led infill. Suggested changes and additions are detailed below, and in summary are:

- Making clear that the community-led exception sites apply to development within existing settlements as well as adjacent to existing settlements. Development of under-utilized land in existing settlements, including garage sites, carparks, spaces in big back gardens and between buildings, can provide a substantial additional supply of land for affordable homes. Community-led groups are exceptionally well-placed to unlock such sites due to their locally embedded nature and high levels of trust working with local people and communities.



- Making clearer that community-led exception sites through infill development can play an important role in the gentle densification of existing settlements. This approach adds new homes precisely where they are need most and supports more efficient use of land and existing support infrastructure and services. There is a good opportunity to strategically and explicitly link the community-led exception policy to more efficient use of land in existing settlements.
- Recognise that communities can play a leading role in developing Design Codes to support the supply of high quality and characterful housing in their areas, and not just as consultees to council or developer led Design Code processes. Communities. Communities hold significant place-based knowhow and care for the longview stewardship and character of their neighbourhoods and so can be well-placed to lead Design Code processes.
- That care should be taken not to be overly prescriptive about what constitutional form community-led housing groups can take. If one of the aims is to diversify the supply of housing, than efforts should be made to enable a diversity of different types of community-led housing groups to participate and contribute. Ensuring longterm community benefit can be ensured not just through organizational form, but also through attention to organizational process and measures such as asset locks.

Section 5. Delivering a sufficient supply of homes

Amend Para 70 b) to read (addition in red):

- b) *seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing. This might include an element of residential plot sub-division in existing low density neighbourhoods;*

Para 73 would require a rethink and a re-write to better address the micro-site/plot sub-division issue. Wording along the following lines should be included:

Local Planning Authorities should support, through policies and decisions, an element of residential plot sub-division in existing low density neighbourhoods to allow the development of community-led and managed affordable homes in perpetuity. The development should be designed to comply with any local design codes or guides where they exist.

If the existing content of Para 73 is to be retained alongside the above, also suggest amending the wording of b) to read (addition in red):

- b) *be adjacent to or within existing settlements, proportionate in size to them³⁷, not compromise the protection given to areas or assets of particular importance in this*



Framework³⁸, and comply with any local design policies and standards.

Section 11. Making effective use of land

Para 124 d) could be expanded to address gentle densification of existing neighbourhoods (addition in red):

- d) *Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure, residential infill and plot sub-divisions in low density neighbourhoods)⁵⁰; and*

Section 12. Achieving well-designed and beautiful places

In reference to the role of community groups in the design code process, suggest the following amendment to Para 132 (adjustments in red):

Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups and community stakeholders can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and others.

Also, suggest the following amendment to Para 134 (additions in red):

Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners, developers and community stakeholders may contribute to these exercises, but may also choose to prepare design codes in support of a planning application(s) for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.

Annex 2

The following adjustment to the definition community-led is suggested:



Community-led developments: A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. It may take any one of various

legal forms including a community land trust, **community interest company**, housing co-operative and community benefit society. **It must be able to demonstrate how it was founded and how it is managed and run with the active participation and guidance of its members and the wider community and for the longterm benefit of that community. For example, through an asset lock.** Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up.

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