

HALLAM LAND MANAGEMENT LIMITED
ST ALBANS SCHOOL
ST ALBANS SCHOOL WOOLLAM TRUST

Woollam Park

Supplementary Note concerning the
National Planning Policy Framework

October 2025



PLANNING
LIMITED

Contents

1	Introduction	3
2	The Ministerial Statement	4
3	The presumption in favour of sustainable development.....	6
4	Delivering a sufficient supply of homes.....	7
5	Promoting sustainable transport.....	8
6	Protecting Green Belt land.....	9
7	Planning and flood risk.....	11
8	Synthesis.....	12
9	References in the Environmental Statement.....	14

APPENDICES

Appendix 1.	Ministerial Statement.....	15
Appendix 2.	Letter from Deputy Prime Minister	16
Appendix 3.	PJA Technical Note.....	17
Appendix 4.	Schedule of NPPF references included in the Woollam Park Planning Application.....	18

DOCUMENT CONTROL

Project:	North St Albans	Job Number:	18.260
Client:	Hallam Land	Date:	30/10/2025
Author Initial:	OJ	Reviewer Initial:	-
Issue:	1	Status:	Final
File Origin:	https://lrmpplanning.sharepoint.com/sites/lrmp/projects/2018/18.260 St Albans/9 Applications/September 2024 hybrid/Technical docs/Planning/240108 Woollam Park_NPPF Supplementary Note.docx		



1 Introduction

- 1.1 Hallam Land, St Albans School and St Albans School Woollam Trust (the Applicants) submitted an outline planning application for a residential led mixed use development at Woollam Park on the 19th December 2024.
- 1.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies and how they should be applied. It is a material consideration in determining planning applications.
- 1.3 The Planning Statement and other planning application documents refer to the December 2023 NPPF, which was current at the time they were prepared.
- 1.4 A revised version of the NPPF was published on the 12th December 2024. For decision-taking this takes effect immediately.
- 1.5 Certain of the references to the NPPF in the applicants' documents are no longer correct by virtue of renumbering.
- 1.6 In certain other respects there have been material changes to policy areas. These include:
 - 1.6.1 the presumption in favour of sustainable development paragraphs 11d;
 - 1.6.2 what now constitutes inappropriate development in the Green Belt and circumstances where new housing and other development should be taken to be appropriate development;
 - 1.6.3 the definition of *Grey Belt* in Annex 2;
 - 1.6.4 *Golden rules* in terms of the contributions housing development in the Green Belt should provide; a vision-led approach to transport and assessing the impact of traffic from new development; and
 - 1.6.5 circumstances where the sequential test for flood risk is not required to be undertaken.
- 1.7 Along with other aspects of planning policy, these are germane to the framework relevant to the submitted planning application.
- 1.8 At the time the planning application was submitted the Applicants acknowledged that certain of the revisions to the NPPF have a material effect on the planning policy context and will need to be considered accordingly by the decision maker. As such, they signalled their intent to address this in due course.
- 1.9 This Supplementary Note has been prepared for this purpose. It identifies where in the Environmental Statement and other planning application documents the 2023 version of the NPPF is referenced and indicates what if any change has occurred. Where this is a material change, it discusses the relevance of the revised planning policy context.
- 1.10 The Government also indicated that it will be publishing revisions to the National Planning Practice Guidance in respect of certain of these matters. In this regard the NPPG was updated in respect of Green Belt on the 27th February 2025 and the Flood Risk on the 17th September 2025. To date, the guidance anticipated in relation to viability has not been published. This too is relevant to the submitted planning application.

2 The Ministerial Statement

- 2.1 The **Minister of State for Housing and Planning**, the Rt. Hon Matthew Pennycook, made a Statement in the House of Commons on the 12th December 2024 alongside the publication of the revised NPPF. The same Statement was made by Baroness Taylor, Parliamentary Under-Secretary of State, in the House of Lords. For convenience this is included at *Appendix 1*.
- 2.2 This Statement frames the revisions to the NPPF and outlines the underlying rationale by reference to the Government's *Plan for Change*; building 1.5 million new homes over the course of this Parliament is one of its key milestones. The revisions to the NPPF are part of a suite of measures to reform the planning system in this regard.
- 2.3 At the same time, the **Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government** wrote to each Local Authority in England to set out the principal changes made to the NPPF. This is included at *Appendix 2*.

- 2.4 The following are of note:

"We inherited an acute and entrenched housing crisis."

"The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000."

"Yet, just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade"

"The Government has responded with the urgency this demands"

"The plan-led approach is, and must remain, the cornerstone of our planning system. It is through local plans that communities shape decisions about how to deliver the housing and wider development their area needs. But we are clear that these decisions must be about how to meet those needs, not whether to do so at all."

"We heard through consultation that our [proposed revisions to the standard] method could go even further in targeting growth at those places where house prices are most removed from local incomes, and so we have made an adjustment to the method to make it more responsive to demand pressures. This will have the effect of altering the distribution, increasing numbers in those places facing the most acute affordability pressures while maintaining ambitious targets across the whole of the country – while maintaining the national total of 370,000 homes per year."

"Meeting ambitious new targets relies on allocating sufficient land to do so."

"But we are clear that brownfield land alone will not be sufficient to meet our needs. And that is why we have grasped the nettle and proposed a modernised Green Belt policy, fit for the 21st century."

"Where local planning authorities fail to plan for and meet their development needs, developers may bring forward proposals on low-performing grey belt land, but with higher performing land protected from this form of release."

"At the centre of our reformed Green Belt policy lie our golden rules, which mean that housing can only be built on Green Belt land if developers deliver high levels of affordable housing, appropriate local infrastructure, and accessible public green space."

"Rapidly driving up planning consents in the context of a system with woefully inadequate local plan coverage will increase the number of permissions secured outside of local plan allocations in the short-term. This is necessary if we are to see the scale of delivery we need to meet our commitment to 1.5 million homes. Therefore, where it applies, the presumption in favour of sustainable development must have real teeth. The changes we make today ensure that the presumption carries real weight, acting as a significant adjustment to the decision-making balance in favour of approving development."

“We are however absolutely clear that this is not a green light for low-quality development. That is why we have amended the presumption to call out the existing safeguards that exist in national policy around the provision of affordable housing, design quality, and sustainability of location.”

“We have been clear that changes need to be made to support the needs of communities beyond the provision of homes and jobs alone. Meeting community needs goes beyond providing homes and jobs – we need the range of services and infrastructure to support communities. The NPPF has therefore been amended to further support the provision of public infrastructure, like health, blue light, library, adult education and university facilities, to help create sustainable, healthy communities.”

“We have made changes to flood risk planning policy to support the delivery of Sustainable Drainage Systems and to improve the operation of the flood risk sequential test in cases where no development on site would be at risk from flooding.”

- 2.5 The above extracts place into context the purpose of the changes that have been made to the NPPF and their significance.

3 The presumption in favour of sustainable development

- 3.1 As a matter of principle, the presumption in favour of sustainable development is engaged in determining planning applications for housing in the District. The circumstances that give rise to this are explained in §6.3 of the Planning Statement; the Local Plan does not contain up-to-date policies in respect of present and future development needs, the District Council is unable to demonstrate a five-year supply of housing land required by Government policy and successive housing delivery tests have fallen below the necessary measurement in Government policy.
- 3.2 The operational effect of the presumption in favour of sustainable development is explained in §11 of the NPPF. As in this instance, for decision taking the presumption means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important to determining the application are out of date, granting planning permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making efficient use of land, securing well-designed places and providing affordable housing, individually or collectively.
- 3.3 The text underlined is new or different text to the 2023 NPPF and represents the intended strengthening.
- 3.4 “Out-of-date” development plan policies are defined by footnote (FN) 8. This includes instances where the local planning authority cannot demonstrate a five year supply of housing land with the appropriate buffer a set out in paragraph 78 or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. These circumstances are well established, as discussed at §8.13 – §8.17 and §8.21 - §8.22 of the Planning Statement.¹
- 3.5 Policies that protect areas or assets of particular importance are defined by FN7. Relevant to this application are policies relating to Green Belt and Flood Risk. These are discussed later.
- 3.6 Key policies are defined by FN9 as §66 and §84 of chapter 5, §91 of chapter 7, §110 and §115 of chapter 9, and §135 and §139 of chapter 12. These are discussed later.

¹ To supplement Table 5 of the Planning Statement, the 2023 Housing Delivery Test records a measure of 52%.

4 Delivering a sufficient supply of homes

- 4.1 A longstanding objective in successive versions of the NPPF is the Government's objective of significantly boosting the supply of new homes. That remains its intent at §61 but this must now be seen in the context of its aspiration that 370,000 new homes are built each year, nationwide, and the recognition that to achieve this, development will occur outside Local Plan allocations.
- 4.2 For each local authority, the overall aim is to meet the area's identified need housing. The St Albans Regulation 19 Plan is being prepared under the transition arrangements and whilst this is a welcome step forward in achieving up to date local plan coverage, an immediate review will be necessary in any event to address the shortfall in housing need (§236 refers).
- 4.3 The Government has revised the standard method that is employed to calculation housing need. For St Albans, housing need now totals 1660 new homes per annum, an increase from 885. This measure is now applied to the calculation of housing supply pursuant to §78. The extent of available housing land is now more significant still, and consequently the housing benefits of the scheme are heightened further.
- 4.4 §66, a key policy specified in FN9, intends that a mix of affordable housing meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures. The requirement to deliver a minimum of 25% of affordable housing as First Homes no longer applies.
- 4.5 §67 introduces "*Golden Rules*" for Green Belt development. To accord with the Golden Rules and therefore to be afforded significant positive weight in the determination, at least 50% of the new homes should be affordable homes, unless this would make the development unviable.
- 4.6 §77 continues to afford an important role to large scale extensions to existing urban areas. Whilst directed at plan-making in the first instance, the relevant considerations are germane to the suitability of North St Albans as a location for new development, especially in the context of a vision led transport strategy that is intended to achieve modal change by investment in active and sustainable modes of travel.
- 4.7 §78 reverses changes made in December 2023 as regards instances where a five-year supply of housing land is necessary and what an appropriate buffer should be. Because of the paucity of housing land supply in the District, these changes are not material in this instance.
- 4.8 It remains the case that the notably important contribution that the proposed development can make to housing supply is highly significant and attracts substantial positive weight in the determination of the application.
- 4.9 Also of note is that the definitions of affordable housing in the NPPF's Glossary have been amended. The Applicants' Affordable Housing Statement included the previous definition at §2.8. This would now be replaced by the new definitions. This is relevant to the specification of tenure in any future Affordable Housing Scheme rather than the principle of the proposed development.

5 Promoting sustainable transport

- 5.1 Transport issues remain important in considering development proposals. Notably paragraph 109 now frames this by reference to “*a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places*”. Such an approach should:
- make transport considerations an important part of early engagement with local communities;
 - ensure patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
 - understand and address the potential impacts of development on transport networks;
 - realise opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
 - identify and pursue opportunities to promote walking, cycling and public transport use; and
 - identify, assess and take into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
- 5.2 As is explained in the accompanying explanatory note from PJA at *Appendix 3*, the Applicants’ transport strategy is already founded on such principles. As set out in the Transport Assessment and other documents, movement within and from the site to key destinations by active and sustainable modes of travel have been the cornerstone of the engagement with the Local Highway Authority and other stakeholders. This approach is similarly aligned with the Local Transport Plan and principles in the emerging Local Plan. Equally in the context of §110, Woollam Park is a location that can positively contribute to a sustainable pattern of development and offers a genuine choice of transport modes. In this regard, the proposed development accords with the modified § 115(a) which intends that “*sustainable transport modes are prioritised take in account of the vision for the site, the type of development and its location.*”
- 5.3 Significantly, Government policy is not directed at improving convenience of private car travel. To the extent that the transport modelling identifies additional queuing on the local highway network this is an outcome that supports alternative modes of travel in line with the vision to promote active and sustainable modes. Because of this, the Applicants intend to invest in key routes for walking, cycling and public transport. In the context of §115(d), any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through this vision led approach.
- 5.4 §116 adjusts the “severe” test by reference to “*taking into account all reasonable future scenarios*”. The highway modelling has considered high and low modal shift scenarios and in neither scenario is the impact on the road network considered to be significant.
- 5.5 §117 has similarly been adjusted to introduce reference to “monitoring”. Monitoring is a mechanism that is already incorporated in the Applicants’ submissions in relation to Sandridgebury Lane.
- 5.6 It remains the case that the proposed development accords with what are now §109, §110, §115 and §116. Notably, §110 and §115 are listed as key policies in FN9.

6 Protecting Green Belt land

6.1 There have been significant amendments to Chapter 13 of the NPPF. Those that directly concern this planning application relate to section entitled *Proposals affecting the Green Belt*.

Inappropriate development

6.2 The application was prepared in the context of new housing being “*inappropriate development*” in the Green Belt and there needing to be Very Special Circumstances to justify the grant of planning permission. Section 9 of the Applicants’ Planning Statement was directed at this point specifically.

6.3 What constitutes inappropriate development has been amended by §155. This now defines development of homes, commercial and other development in the Green Belt as appropriate development where specified criteria are met.

6.4 Firstly, the proposed development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Grey Belt is defined in the NPPF’s Glossary. This is discussed later.

6.5 Secondly, there would need to be a demonstrable need for the type of development proposed. For housing, that is determined by reference to the lack of a five year supply of deliverable housing sites or where the Housing Delivery Test is below 75%. These two criteria are both met in this instance.

6.6 Thirdly, the development would need to be in a sustainable location, with reference to §110 and §115 of the Framework. These concern locational characteristics associated with travel and accessibility. North St Albans is widely accepted to represent such a location, to such an extent that the LPA has chosen to propose development here for that reason.

6.7 Finally, what are termed “*Golden Rules*” must be met. The applicable Golden Rules are specified in §156.

6.8 In the instance of this application the Golden Rules would require the following contributions to be made:

- a) 50% affordable housing (calculated by reference to paragraph 67b);
- b) Necessary improvements to local and national infrastructure;
- c) The provision of new, or improvements to existing, green spaces that are accessible to the public.

6.9 Whilst the Applicants have proposed that 40% of new homes proposed are provided as affordable housing across a range of tenures and types, to qualify for the Golden Rule it would need to increase this by a further 100 affordable homes provided this does not affect the viability of the Scheme. The Applicants have identified various aspects of local infrastructure that may require improvement, and this is listed in its draft heads of terms for a planning obligation and this is subject to discussion with the LPA and other consultees. The Applicants’ Design and Access Statement illustrates how new residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces including a new route to the Hertfordshire Way that has a community-wide utility.

Grey Belt

6.10 To attract the status of appropriate development, paragraph 155(a) requires the land concerned to constitute “*Grey Belt*”. Grey Belt is not subject to any spatial delineation and is therefore a matter of planning judgement exercised by reference to the contribution of land to three of the five purposes of the Green Belt. This is defined in the NPPF’s Glossary as:

“Land in the Green Belt comprising previously developed land and/or any other land that, in either case does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.”

6.11 It is instructive to note the qualifying term; “strongly”.

- 6.12 Purpose (a) is to check the unrestricted sprawl of large built-up areas. Purpose (b) is to prevent neighbouring towns merging into one another. Purpose (d) is to preserve the setting and special character of historic towns.
- 6.13 We note that the Strategic Planning Team's response to the application, having considered the definitions in the NPPG, view the application site as Grey Belt.
- 6.14 We do not demur from that assessment. The nature of the application site is such that:
- (1) it is not especially important in checking unrestricted sprawl;
 - (2) its' boundaries are defined clearly and restrict further expansion towards Harpenden or Sandridge or Childwickbury;
 - (3) the contained nature of the site results in a compact form of development;
 - (4) the proposed development would not result in St Albans and Harpenden merging;
 - (5) St Albans is not an historic town, but regardless the application site is not important to preserving the setting of its historic attributes.
- 6.15 It is unarguable, however, that the countryside would be encroached upon, but that is not a distinguishing factor in the definition of Grey Belt.
- 6.16 Even if a different view is reached in relation to this point and the application site, for some reason, is not considered to represent Grey Belt land and would conflict with §155a, it remains the case that Very Special Circumstances exist to justify the grant of planning permission in the terms explored in Section 9 of the Planning Statement. These circumstances are in fact strengthened when local housing need calculated by reference to the new standard method is taken into account.

7 Planning and flood risk

- 7.1 Flood mapping published by the Government, most recently on the 28th January 2025 illustrates that parts of the application site are subject to surface water run-off in storm events. This is recognised in the applicants Flood Risk Assessment. It is also recognised in the Strategic Flood Risk Assessment undertaken as part of the Local Plan process.
- 7.2 The NPPF intends that inappropriate development – defined by reference to flood risk vulnerability – should be avoided by directing development away from areas at highest risk. The Strategic Flood Risk Assessment adopted this risk-based approach and determined that development at North St Albans was appropriate in that development could be satisfactorily placed to avoid those parts of the site at risk from surface water flooding or otherwise suitably mitigated. The Regulation 19 Plan has gone on to propose the allocation at North St Albans accordingly.
- 7.3 §175 is a new paragraph that intends to limit the circumstances where a sequential test is required. Such a test is not required where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).
- 7.4 The update to the NPPG of September 2025 states:
- “In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.”*
- 7.5 The Applicants’ post development hydraulic modelling has informed the surface water drainage strategy. The revised Flood Risk Assessment demonstrates that the pre-conditions above are satisfied.
- 7.6 The land use parameter plan has carefully placed those component parts that comprise more vulnerable development and has developed a surface water strategy that employs passive sustainable urban drainage measures to capture and convey those flow routes within the areas of green infrastructure. These measures ensure that the proposed development would be safe for its lifetime and would not increase the risk of flooding off-site. It is also the case that a betterment can be achieved and the depth of flooding currently experienced on Sandridgebury Lane at the rail bridge can be reduced.
- 7.7 Because of this, and the overall contribution of the proposed development to the Local Plan in terms of its contribution to meeting identified needs at a highly accessible location in accordance with the spatial strategy with ensuing wider sustainability benefits to the community that outweigh the limited extent of flood risk, the proposed development has met the exception test in §177 and §178 of the NPPF in any event. Flood risk does not therefore represent a “strong” reason to refuse planning permission.
- 7.8 The applicant has considered sequentially preferable sites in its Flood Risk Assessment. It is notable that there are sites which the LPA consider appropriate for development that are both with lesser and greater extents of surface water flood risk. In this regard, it is instructive that the development needs of the District cannot be met on reasonably available sites with a lesser extent of flood risk.

8 Synthesis

- 8.1 There are notable changes to the NPPF that are especially relevant to the submitted application.
- 8.2 The adjustment to §11d to strengthen the presumption is highly relevant.
- 8.3 There must now be “strong” reasons to refuse planning permission under limb 1. This introduces a judgement. It enables there to be conflict with aspects of the policy but to warrant planning permission being refused the extent or effect of the conflict would need to be highly significant. This is a judgement of fact and degree for the decision maker to determine having proper regard to relevant material considerations.
- 8.4 Equally, the second limb now requires particular regard to various “key policies”. This elevates those listed matters are aspects of policy that need careful attention in order to judge the view that should be formed in overall terms. In this instance it is evident the proposed development should be judged positively by reference to those key policies.
- 8.5 It is plainly the case that the proposed development will contribute to many planning policy objectives of the NPPF and that, critically, its benefits are substantial and comply with a great many of the NPPF’s intended outcomes. This high degree of compliance with the NPPF is a material consideration that weighs heavily in favour of the grant of planning permission. In this instance, given the circumstances that exist in the District, the social and environmental objectives of sustainable development are particularly relevant.
- 8.6 §6.35 of the Planning Statement summarised the circumstances associated with the proposed development:
- As a residential led mixed-used development the proposal will provide a range of houses to meet the needs of the present and future generations whilst fostering a well-designed place taking advantage of its highly accessible location and providing substantial areas of open space that will support the community’s well-being. Investment in active travel measures between the site and key destinations will provide opportunity both for the future resident population and the existing population to capitalise on the compact nature of St Albans. By careful design, and with adherence to the development strategies that inform the detailed design that is to follow, the proposed development will achieve an efficient use of land and the provision of much needed housing within a framework of multifunctional green and blue infrastructure that will deliver a wide range of natural environment benefits. Economic benefits also arise from the non-residential uses that are proposed.*
- 8.7 That analysis remains highly germane in the context of §66, §110, §115, §135 and §139 which are references in §11d(ii)
- 8.8 Second is the new approach taken to development in the Green Belt.
- 8.9 The extent to which the proposed development now constitutes inappropriate development is to be judged against § 155 and §156, notably whether the application site constitutes Grey Belt land and whether the scheme meets the golden rules.
- 8.10 The application site does not contribute strongly to any of the relevant purposes (a), (b) and (d). The application site is such that it is not especially important in checking unrestricted sprawl. The contained nature of the site results in a compact form of development. The site’s boundaries are defined clearly and restrict further expansion towards Harpenden or Sandridge or Childwickbury; the proposed development would not result St Albans and Harpenden merging. The site is not important to the setting of an historic town.
- 8.11 Moreover, given the extent to which the Green Belt encompasses land within the District, the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

8.12 Regardless of this, very special circumstances exist that justify the grant of planning permission in this instance. For the reasons already set out by the Applicants, the planning balance leans firmly towards granting planning permission. The changes to the NPPF strengthen this conclusion.

9 References in the Environmental Statement

- 9.1 The Environmental Statement includes various references to the NPPF as contextual information for the assessment undertaken in various topic chapters. These are listed in the table at Appendix 4 which includes a schedule of all NPPF references and the applicable changes.

Appendix 1. Ministerial Statement

Building the homes we need

Statement made on 12 December 2024

Statement UIN HCWS308

Statement made by



Matthew Pennycook

Minister of State for Housing and Planning

Labour

Greenwich and Woolwich

 Commons



Statement

This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.

That is why the Plan for Change committed to rebuild Britain, with the hugely ambitious goal of delivering 1.5 million new homes this Parliament, and the vital infrastructure needed to grow our economy and support public services.

The Government has responded with the urgency this demands. We published a consultation on a revised National Planning Policy Framework within a month of gaining office, proposing measures to reverse anti-supply changes introduced in December 2023 and in their place setting out pro-growth reforms. Since then, we have published proposals to prioritise and fast-track building on previously developed urban land through a 'brownfield passport' and for speeding up decision making through modernisation of planning committees. Next year, we will introduce a Planning and Infrastructure Bill to speed up and streamline the planning process, to build more homes of all tenures and accelerate the delivery of major infrastructure projects. At the Budget on 30 October, we committed an additional £50 million to boost capacity to deliver this ambitious planning reform agenda, alongside providing an additional £500 million in grant for affordable housing, and further £3 billion of additional support to the private housing market, to translate permissions into build out.

Today's publication marks the next step in delivering on our promise to radically reform the planning system. The measures set out below build on more than 10,000 consultation responses and extensive engagement with private housebuilders, affordable housing providers, local authorities and other organisations from the sector. Taken together, they reflect our commitment not to duck the hard choices that must be confronted in order to tackle the housing crisis – because the alternative is a future in which a decent, safe, secure and affordable home is a privilege enjoyed only by some rather than being the right of all working people.

RESTORING AND RAISING HOUSING TARGETS

The plan-led approach is, and must remain, the cornerstone of our planning system. It is through local plans that communities shape decisions about how to deliver the housing and wider development their area needs. But we are clear that these decisions must be about how to meet those needs, not whether to do so at all. We are therefore restoring mandatory housing targets. This means that local authorities must use the standard method as the basis for determining housing requirements in their local plans.

As we set out in July, a mandatory method is insufficient if the method itself is not adequate to meet housing need. We consulted on an ambitious revision of the existing standard method, increasing the total annual national target from 300,000 to 370,000, ending the reliance on decade-old population projections, and removing the arbitrary 35 percent 'urban uplift' that resulted in a skewed national distribution, disproportionately focused on London to the detriment of the rest of the country. Instead, the new method relies on a baseline set at a percentage of existing housing stock levels, to better reflect housing pressures right across the country, and uses a stronger affordability multiplier to focus additional growth on those places facing the biggest affordability challenge.

We heard through the consultation that our method could go even further in targeting growth at those places where house prices are most removed from local incomes, and so we have made an adjustment to the method to make it more responsive to demand pressures. The final method now incorporates an even stronger affordability adjustment – nearly four times as strong as the inherited formula. This will have the effect of altering the distribution, increasing numbers in those places facing the most acute affordability pressures while maintaining ambitious targets across the whole of the country.

BUILDING IN THE RIGHT PLACES

Meeting ambitious new targets relies on allocating sufficient land to do so. We have been clear that developers should first look to brownfield, or previously developed, land. That is essential to protect our most valuable countryside and agricultural land. And we have made changes to support that, making the default answer to proposals to build on brownfield 'yes' and expanding the current definition of brownfield land to include hard standing, ahead of further reforms planned for next year on the back of our brownfield passport working paper. Together, these changes will ensure that we make full and efficient use of previously developed land.

But we know that there are simply not enough sites on brownfield land registers to deliver the volume of homes that the country needs each year, let alone enough that are viable and in the right location. And that is why we have grasped the nettle and proposed a modernised, strategic approach to Green Belt land designation and release, fit for the 21st century.

In the first instance, it requires local authorities to use the local plan process to adopt a 'sequential approach', considering brownfield, then grey belt, and only then higher performing land – all while ensuring that sustainability is a central consideration throughout. We expect authorities to conduct Green Belt reviews, to identify the right land to bring forward in their areas. Where authorities fail to meet development needs, developers may bring forward proposals on low-performing grey belt land outside of the plan process, but with higher performing land protected from this form of release.

Through our consultation we found broad support for this strategic approach to Green Belt release, and for the concept of grey belt, which recognises that there are significant parts of the Green Belt that contribute little by way of aesthetic, public access, or ecological value. However, we did see evidence that our proposed definition of grey belt was likely to leave too much room for subjectivity and debate. In response, we have set out a clearer description of how to assess whether land meets the definition, and we will be providing further guidance in the new year. We remain clear that existing protections for land covered by environmental and national landscape designations – for example National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest – will remain.

At the centre of our reformed Green Belt policy lie our golden rules, which mean that housing can only be built on Green Belt land if developers deliver high levels of affordable housing, appropriate local infrastructure, and accessible public green space. Our consultation proposed rules requiring that residential schemes across the country would deliver 50 percent affordable housing, while recognising that because land values vary, the limited use of viability assessments should be permitted within certain constraints. The objective of these rules was to make sure that the public would receive the fair share of the 'planning uplift' driven by the new rules, and that returns to landowners would be fair but not excessive.

We received significant feedback from a wide range of stakeholders who welcomed the ambition of these rules and the commitment to maximising affordable housing delivery, but who shared strong evidence that fixing the affordable housing requirement at 50 percent nationally would not reflect regional variations in viability and would hinder delivery. This risked leaving authorities with a choice: allow flexibility and turn the amount of affordable housing into a negotiation; or hold firm and make sites unviable, delivering no homes, affordable or otherwise. Responding to this, our final policy introduces a 15 percentage point premium on top of existing affordable housing requirements, up to a maximum of 50 percent, and rules out any negotiation until we have strengthened national planning practice guidance on viability – in which we will consider the case for permitting viability negotiations on previously developed land and larger strategic sites, likely to carry greater infrastructure costs.

In a majority of authorities, this will result in an affordable housing requirement of 50 percent. Local authorities will be required to adopt their own ambitious golden rules through the local plan process, which will supersede these national requirements as new plans come into force. This revised approach delivers on our commitment to sharing the proceeds of land value uplift fairly, securing

clear public benefits, while delivering more homes and more affordable homes than a flat 50 percent rate. It will increase the speed of housing provision by giving all actors greater certainty about what is required and what will achieve planning permission.

SUPPORTING LOCAL PLANNING

We have made clear our commitment to universal local plan coverage – local plans are the best way of engaging communities in decisions about the future of their area, of optimising use of land to deliver for the economy and for the environment, and for giving the certainty businesses need to invest in development. A plan-led system in which fewer than a third of places have up-to-date plans does not work. That is why we are taking a tough but pragmatic approach to imposing new housing numbers on local plans; one which sees new numbers feed through into local plans as quickly as possible, while allowing well-developed plans to be adopted.

We are making three changes to the proposals we consulted on, reflecting these twin objectives. First, we will give local authorities an extra two months to progress their plans under the existing framework. Those that reach examination will be assessed in line with existing housing targets, but where there is a significant shortfall will be required to begin work on a new plan as soon as the new plan-making system commences next summer. Similarly, those that reach the final stage of plan preparation will be allowed to progress only where there is no significant shortfall. Second, responding to feedback that we should measure significant shortfall in proportionate rather than absolute terms, we are replacing the 200 home threshold with a requirement that plans provide for at least 80 percent of the new standard method figure. Third, we are introducing a new requirement that authorities with plans adopted under the old standard method must provide an extra year's worth of homes in their five-year housing pipeline. This requirement will kick in from 1 July 2026 and drive authorities to take steps to close the gap between existing housing requirements and the new targets by bringing more land into the system.

We recognise that going back and increasing housing numbers will create additional work, which is why we will provide financial support to those authorities asked to do this. To ensure that local authorities are well-equipped and supported to implement our policy changes, we will provide grant funding to support authorities with local plan delivery and Green Belt reviews. A total of £14.8 million is available across both funds to support local planning authorities with these costs. In light of the revised National Planning Policy Framework, I will be writing to all local planning authorities with more details, and asking them to provide an updated plan-making timetable within 12 weeks, in order to drive delivery and give transparency over progress.

I expect authorities to rise to this challenge – over the last five months we have seen an acceleration on plan-making, which demonstrates what is possible with clear policy direction from national government and the right political will at a local level. But we will use the full range of ministerial intervention powers at our disposal if that does not happen – including taking over an authority's plan making directly. The revised local plan intervention criteria, published today, will boost our ability to act quickly where plan-making stalls.

The pressure on planning departments goes beyond plan-making, as we drive towards the unprecedented numbers of planning permissions needed to meet our 1.5 million homes and wider development objectives. That is why, responding to consultation feedback, we will set householder application fees at what we estimate is cost-recovery level, in order that applicants cover the costs of processing their planning applications. This will bring a boost of more than £50 million per year into local planning authorities from next year, enabling authorities to provide a quicker, better service. We will, through the Planning and Infrastructure Bill, go further in enabling local planning authorities to vary or set fees to cost recovery levels as appropriate for their area. This funding comes on top of the additional £50 million of planning capacity and capability funding announced at Budget. In combination with the dedicated support for updating local plans, this amounts to a package of over £100 million in the coming year.

SECURING HIGH-QUALITY DEVELOPMENT AND MORE AFFORDABLE HOUSING

Rapidly driving up planning consents in the context of a system with woefully inadequate local plan coverage will increase the number of permissions secured outside of local plan allocations in the short-term. This is necessary if we are to see the scale of delivery we need to meet our commitment to 1.5 million homes. Therefore, where it applies, the presumption in favour of sustainable development must have real teeth. The changes we make today ensure that the presumption carries real weight, acting as a significant adjustment to the decision-making balance in favour of approving development. We are however absolutely clear that this is not a green light for low-quality development. That is why we have amended the presumption to call out the existing safeguards that exist in national policy around the provision of affordable housing, design quality, and sustainability of location, in line with the proposals we consulted on. We simply do not accept there is an inherent trade-off between supply and quality.

We have taken wider steps to drive the reformed housebuilding industry we are committed to delivering – one that is more responsive to consumer needs, which places affordability at the heart of what it does, and which builds out faster. We are therefore making changes to set an expectation of mixed-tenure on large sites, support more small sites to come forward to support SME delivery, and make clear our support for Social Rent schemes. Reflecting the absolute priority we attach to delivering Social Rent homes, we are amending the definition of Affordable Housing to carve it out as a separate category, distinct from the broader category of affordable housing for rent.

As part of the Government's plans to deliver much needed affordable homes, Homes England is today launching a new clearing service to help unblock the delivery of section 106 affordable housing. This follows reports in recent months of developers experiencing greater difficulty in selling section 106 affordable homes for which they have planning permission. This new service will help improve the functioning of the market for affordable housing, by supporting buyers and sellers to find each other more effectively – with developers able to share details of unsold section 106 affordable homes for registered providers and local authorities to search. The service aims to facilitate dialogue and partnerships that allow homes to be delivered in line with the originally agreed tenure mix set out in section 106 agreements. It will also provide new data and insight into the section 106 market. The Government is calling on all developers with uncontracted section 106 affordable homes, including small and medium builders, to proactively and pragmatically engage with the new clearing service, and on registered providers and local planning authorities to engage positively as providers and enablers of affordable housing. This is an important step in unlocking these homes and driving delivery.

As new land enters the system, we expect to see new permissions rapidly translated into build out. In order that we have transparency and accountability, I will introduce secondary legislation next year to implement powers brought forward under the Levelling Up and Regeneration Act 2023 to require developers to commit to a build out trajectory upfront and report on delivery against it. Where that does not happen, authorities will be empowered to hold them to account – including through declining to determine applications from developers with a poor record of delivery. We will publish technical consultations to guide delivery of the necessary regulations in the new year.

BUILDING INFRASTRUCTURE TO GROW THE ECONOMY

Finally, in July we proposed changes to the planning system to drive greater commercial development in those sectors which will be the engine of the UK's economy in the future. We will confirm the changes as detailed in the consultation and make it easier to build laboratories, gigafactories, data centres and digital infrastructure, and the facilities needed to support the wider supply chain. We will also specifically recognise the need to support proposals for new or upgraded facilities and infrastructure, setting the expectation that suitable sites for these types of modern economy uses are identified in local plans. As proposed in the summer, we will bring onshore wind back into the Nationally Significant Infrastructure Projects consenting regime, and raise the threshold of projects for both onshore wind and solar to 100MW. We will follow through with prescribing data centres, gigafactories and laboratories as types of business or commercial development capable of being directed into the Nationally Significant Infrastructure Projects consenting regime, depending on the scale of the project.

PART OF A BIGGER PLAN

These are necessary changes to unlocking the land needed to deliver 1.5 million homes and the scale of new infrastructure we will need to support growth. But we are clear that they must form part of a wider plan to address wider blockers in the planning system and to drive rapid build out. We will use the Planning and Infrastructure Bill to improve certainty in decision-making, create a win-win for development and nature, and streamline processes for critical infrastructure. Since we know that we cannot meet housing need without planning for growth on a larger than local scale, we will empower local leaders to work cross-boundary to deliver strategic plans.

Only by delivering these reforms will we unlock investment and delivery. It is also vital that, alongside the appropriate infrastructure, these reforms also deliver substantial affordable housing. It is vital that local communities can see the benefits of development in terms of enhancements to public services and more affordable housing for local people. We recognise that to deliver on these reforms we will need to work in partnership with local leaders, housebuilders and infrastructure developers to deliver investment into these sectors, and we are grateful for the support for these proposals from across the sector.

These reforms are essential to transform the housing crisis, deliver growth, protect the environment, and provide hope to the many thousands of people locked into substandard and unaffordable housing.

Appendix 2. Letter from Deputy Prime Minister



Ministry of Housing, Communities & Local Government

Rt Hon Angela Rayner MP
Deputy Prime Minister

***Ministry of Housing, Communities &
Local Government***
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

www.gov.uk/mhclg

To: all local authority Leaders and Metro Mayors in
England
Cc: all local authority Chief Executives and combined
authority Chief Executives in England

12 December 2024

Building the homes we need

We inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.

The Government has responded with the urgency this demands. We published a [consultation](#) on a revised [National Planning Policy Framework](#) within a month of gaining office, proposing measures to reverse anti-supply changes introduced in December 2023 and in their place setting out pro-growth reforms. These included ambitious new housebuilding targets and a modernised Green Belt policy, alongside a wider set of changes designed to boost the supply of land and better meet community needs.

Today we publish a revised, pro-growth [National Planning Policy Framework](#). This marks the next step in delivering on our promise to radically reform the planning system. The measures set out below build on more than 10,000 consultation responses and extensive engagement with business, local government and wider housing and development stakeholders. Taken together, they reflect our commitment not to duck the hard choices that must be confronted in order to tackle the housing crisis – because the alternative is a future in which a decent, safe, secure and affordable home is a privilege enjoyed only by some rather than being the right of all working people.

I therefore wanted to take this opportunity to set out the principal changes. In recognition of the extra pressures many of the reforms announced today will put on Councils, we are also bringing forward changes to planning fees, funding on green belt and we have listened on transitional arrangements. The Government also remains committed to enhancing the capacity and capability of local planning authorities with increased funding.

It is only by working together with local and regional leaders, will we be able to tackle our national housing emergency and generate the sustained sustainable economic growth needed to improve the prosperity of our country and the living standards of working people. Therefore, in the spirit of collaboration and to achieve this shared endeavour, I have set out below the principal elements of our plan.

A new standard method for assessing housing needs

The plan-led approach is, and must remain, the cornerstone of our planning system. It is through local plans that communities shape decisions about how to deliver the housing and wider development their area needs. But we are clear that these decisions must be about how to meet those needs, not whether to do so at all.

As we set out in July, a mandatory method is insufficient if the method itself is not adequate to meet housing need. We consulted on an ambitious revision of the existing standard method, increasing the total annual national target from 300,000 to 370,000, ending the reliance on decade-old population projections, and removing the arbitrary 'urban uplift' that resulted in a skewed national distribution, disproportionately focusing on London and undershooting ambition across much of the country. Instead, the new method relies on a baseline set at a percentage of existing housing stock levels, to better reflect housing pressures right across the country, and uses a stronger affordability multiplier to focus additional growth on those places facing the biggest affordability pressures.

We heard through consultation that our method could go even further in targeting growth at those places where house prices are most removed from local incomes, and so we have made an adjustment to the method to make it more responsive to demand pressures. This will have the effect of altering the distribution, increasing numbers in those places facing the most acute affordability pressures while maintaining ambitious targets across the whole of the country – while maintaining the national total of 370,000 homes per year.

Grey belt, Green Belt, and Golden Rules

Meeting ambitious new targets relies on allocating sufficient land to do so. We have been clear that developers should first look to brownfield land, and have made changes to promote this ahead of further reforms on the back of our brownfield passport working paper.

But we are clear that brownfield land alone will not be sufficient to meet our needs. And that is why we have grasped the nettle and proposed a modernised Green Belt policy, fit for the 21st century. In the first instance, it requires local authorities to use the local plan process to adopt a 'sequential approach', considering brownfield, then grey belt, and only then higher performing land. Where local planning authorities fail to plan for and meet their development needs, developers may bring forward proposals on low-performing grey belt land, but with higher performing land protected from this form of release.

Through our consultation we found broad support for this strategic approach to Green Belt release but, in response to feedback on the proposed definition of grey belt, we have set out a clearer description of how to assess whether land meets the definition, and we will be providing further guidance in the new year.

At the centre of our reformed Green Belt policy lie our golden rules, which mean that housing can only be built on Green Belt land if developers deliver high levels of affordable housing, appropriate local infrastructure, and accessible public green space. We received significant feedback from a wide range of stakeholders who welcomed the ambition of these rules and the commitment to

maximising affordable housing delivery, but who shared strong evidence that fixing the affordable housing requirement at 50 percent nationally would not reflect regional variations in viability and would hinder delivery. This risked leaving authorities with a choice: allow flexibility and turn the amount of affordable housing into a negotiation; or hold firm and make sites unviable, delivering no homes, affordable or otherwise. Responding to this, our final policy introduces a 15 percentage point premium on top of existing affordable housing requirements, up to a maximum of 50 percent, and rules out any negotiation until we have strengthened national planning practice guidance on viability – in which we will consider the case for permitting viability negotiations on previously developed land and larger strategic sites, likely to carry greater infrastructure costs.

Universal coverage of local plans

The plan-led approach is, and must remain, the cornerstone of the planning system. We understand the need to balance keeping plans progressing with making sure they plan for sufficient housing. We are proposing a transitional approach that will allow those local plans that have reached examination to continue, along with those who have made it to the final stage of the plan-making process (Regulation 19), so long as they provide for at least 80% of the new housing need figure.

In response to feedback, we will also be extending the period from which the revised NPPF takes effect for plan-making to three months after its publication, rather than one month as was consulted upon. In addition, and to close the gap between existing plan allocations and new targets, we will introduce a new requirement that authorities with plans adopted under the old standard method must provide an extra year's worth of homes in their 5-year housing pipeline from July 2026.

In light of the new clear pathway provided by the revised NPPF and the above transitional arrangements, we now ask that Councils review and update their timetables for getting an up-to-date plan in place within the next 12 weeks. We are prepared to use our intervention powers if necessary to ensure updated timetables are prepared, suitably ambitious plans are progressed and sound plans are adopted.

Securing high quality development and more affordable housing

Rapidly driving up planning consents in the context of a system with woefully inadequate local plan coverage will increase the number of permissions secured outside of local plan allocations in the short-term. This is necessary if we are to see the scale of delivery we need to meet our commitment to 1.5 million homes. Therefore, where it applies, the presumption in favour of sustainable development must have real teeth. The changes we make today ensure that the presumption carries real weight, acting as a significant adjustment to the decision-making balance in favour of approving development. We are however absolutely clear that this is not a green light for low-quality development. That is why we have amended the presumption to call out the existing safeguards that exist in national policy around the provision of affordable housing, design quality, and sustainability of location, in line with the proposals we consulted on. We simply do not accept there is an inherent trade-off between supply and quality.

We have taken wider steps to drive the reformed housebuilding industry we are committed to delivering – one that is more responsive to consumer needs, which places affordability at the

heart of what it does, and which builds out faster. We are therefore making changes to set an expectation of mixed-tenure by default on large sites, support more small sites to come forward to support SME delivery, and lend additional weight in the planning balance to majority Social Rent schemes. Reflecting the absolute priority we attach to delivering Social Rent homes, we are amending the definition of Affordable Housing to carve it out as a separate category, distinct from the broader category of affordable housing for rent.

As new land enters the system, we expect to see new permissions rapidly translated into build out. In order that we have transparency and accountability I will introduce secondary legislation next year to implement powers brought forward under the Levelling Up and Regeneration Act 2023 to require developers to commit to a build out trajectory upfront and report on delivery against it. Where that does not happen, authorities will be empowered to hold them to account – including through refusing applications from developers with a poor record of delivery. We will publish technical consultations to guide delivery of the necessary regulations in the new year.

As part of the Government's plans to deliver much needed affordable homes, Homes England is today also launching a new clearing service to help unblock the delivery of section 106 affordable housing. This follows reports in recent months of developers experiencing greater difficulty in selling section 106 affordable homes for which they have planning permission. This new service will help improve the functioning of the market for affordable housing, by supporting buyers and sellers to find each other more effectively.

Delivering community needs

We have been clear that changes need to be made to support the needs of communities beyond the provision of homes and jobs alone. Meeting community needs goes beyond providing homes and jobs – we need the range of services and infrastructure to support communities. The NPPF has therefore been amended to further support the provision of public infrastructure, like health, blue light, library, adult education and university facilities, to help create sustainable, healthy communities.

Building infrastructure to grow the economy

We will confirm the changes as trailed in the consultation and make it easier to build laboratories, gigafactories, data centres and digital infrastructure, and the facilities needed to support the wider supply chain. We will also specifically recognise the need to support proposals for new or upgraded facilities and infrastructure, setting the expectation that suitable sites for these types of modern economy uses are identified in local plans. We will follow through with prescribing data centres, gigafactories and laboratories as types of business or commercial development capable of being directed into the Nationally Significant Infrastructure Projects consenting regime.

Green energy, flood risk, and the natural environment

We have made immediate changes to the NPPF to support climate change mitigation and adaptation, through increased deployment of renewables and changes to wording to emphasise the importance of climate change considerations in both decision-making and plan-making. As proposed in the summer, we will bring onshore wind back into the Nationally Significant Infrastructure Projects consenting regime, and raise the threshold of projects for both onshore

wind and solar to 100MW. We have made changes to flood risk planning policy to support the delivery of Sustainable Drainage Systems and to improve the operation of the flood risk sequential test in cases where no development on site would be at risk from flooding. We have also signalled support for priority and threatened wildlife such as bats, hedgehogs and swifts.

Planning capacity and capability

We acknowledge that many of the reforms announced today represent significant changes in the planning process and may also provide extra pressure on planning authorities, and indeed planners themselves. Therefore, I wanted to make it clear that the Government remains committed to enhancing the capacity and capability of local planning authorities. This is why we have set aside over £14m to provide grant funding support which will enable local authorities to implement our policy changes. This funding will be provided to local authorities that are at an advanced stage of the local plan making process (Regulation 19 stage), and that will need to revise their draft plans to accommodate the increase in their local housing need figures as a result of our changes. The funding will also provide additional support to local authorities that will need to undertake a Green Belt review. Local planning authorities will be invited to request a share of these funds via an expression of interest, details of which will be provided to local planning authorities early next week. This comes on top of the additional £50 million announced at Budget to boost capacity in the planning system.

This should be seen alongside the wider initiatives that are already having an impact in the sector, including the ongoing Pathways in to Planning programme run by the LGA, which continues to see new graduates placed into local planning authorities, as well as the funding provided to grow the work of Public Practice in placing senior built environment professionals in to the public sector.

Planning fee increases

The scale of our ambition means we will be asking much more of the planning system. We have therefore announced an increase in householder and other minor planning fees to provide an immediate boost to LPA resourcing. We will also take forward measures to enable LPAs to vary or set fees to cost recovery level as appropriate for their area, and to enable host local authorities to recover costs of the services they provide in relation to applications under the Nationally Significant Infrastructure Projects consenting regime. This will be critical to supporting their role in ensuring local issues are considered in major infrastructure proposals. We expect this shift towards cost recovery to generate over £50m in additional revenue for local planning authorities.

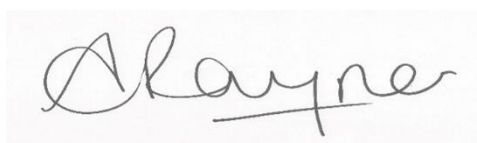
Modernising planning committees

Finally, I also want to highlight that the Government published on Monday a working paper on modernising planning committees in England to inform the Planning and Infrastructure Bill which will be introduced next year. This paper forms part of a series of working papers we will be publishing on different aspects of planning reform, designed to inform further policy development in collaboration with the wider sector. It proposes options to modernise planning committees that would support the plan-led system, including the introduction of a national scheme of delegation, a new system of targeted committees for strategic development, and mandatory training for committee members.

Only by delivering these reforms will we unlock investment and delivery. It is also vital that, alongside the appropriate infrastructure, these reforms also deliver substantial affordable housing. It is vital that local communities can see the benefits of development in terms of enhancements to public services and more affordable housing for local people. We recognise that to deliver on these reforms we will need to work in partnership with local leaders, housebuilders and infrastructure developers to deliver investment into these sectors, and we are grateful for the support for these proposals from across the sector.

I would like to thank you for your continued engagement with Government as we deliver our hugely ambitious goal of delivering 1.5 million new homes this Parliament, and the infrastructure needed to grow our economy and support public services. You play a key role in delivering our Plan for Change and I look forward to continuing to work together to deliver for our country.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A Rayner', is centered on a light grey rectangular background.

Rt Hon Angela Rayner MP
Deputy Prime Minister

Appendix 3. PJA Technical Note

Technical Note

Project: Woollam Park, North St Albans

Subject: Summary of Changes to NPPF in relation to Submitted Transport Assessment

Client:	Hallam Land Management Limited, St Albans School and St Albans School Woollam Trust		
Project No:	05920	Version:	1
Document Ref:	05920-T-14-A	Author:	KN
Date:	13/01/2025	Approved:	MM

I Introduction

- 1.1.1 PJA has prepared a Transport Assessment (dated 04 December 2024) to support a planning application for the residential-led development of land (referred to as Woollam Park) in North St Albans. The application was submitted in December 2024 but is yet to be validated by the local planning authority.
- 1.1.2 The assessment and approach contained in the submitted Transport Assessment was prepared in the context of the National Planning Policy Framework (NPPF). This focussed on alignment to the December 2023 version of the NPPF as this was the current adopted version at the time the report was prepared. The Transport Assessment however also considered draft changes to the NPPF which were consulted on between July and September 2024 but not yet adopted at this time.
- 1.1.3 The approach taken in development the transport strategy for and assessment of the Woollam Park development follows that established through published Decide and Provide guidance with a move towards vision-led transport planning.
- 1.1.4 Since the preparation and submission of the Transport Assessment, an updated version of the NPPF has been published (12 December 2024). This cements and further reinforces the move to vision-led transport planning.
- 1.1.5 This Technical Note provides a brief summary of the changes resulting from the revised NPPF and demonstrates the Transport Assessment and transport strategy for Woollam Park are compliant with this revised national policy with the conclusions established still holding.

2 NPPF Changes

2.1.1 The key changes to the NPPF published in December 2024, relating to transport, are summarised in Table 1.

Table 1: Key Changes to the NPPF

NPPF (December 2023)	NPPF (December 2024)
<p>Paragraph 108:</p> <p>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ul style="list-style-type: none"> a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. 	<p>Paragraph 109:</p> <p>Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:</p> <ul style="list-style-type: none"> a) Making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
<p>Paragraph 114:</p> <p>In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <ul style="list-style-type: none"> a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects 	<p>Paragraph 115:</p> <p>In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <ul style="list-style-type: none"> a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; (b) safe and suitable access to the site can be achieved for all users; (c) the design of streets, parking areas, other transport elements and the content of associated standards reflects

<p>current national guidance, including the National Design Guide and the National Model Design Code; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p>	<p>current national guidance, including the National Design Guide and the National Model Design Code; and (d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.</p>
<p>Paragraph 115:</p> <p>Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>	<p>Paragraph 116:</p> <p>Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.</p>
<p>Paragraph 117:</p> <p>All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.</p>	<p>Paragraph 118:</p> <p>All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed.</p>
<p>Glossary: Transport Assessment</p> <p>A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development</p>	<p>Glossary: Transport Assessment</p> <p>A comprehensive and systematic process that considers and sets out transport issues relating to a proposed development, in the context of the vision for the scheme. It identifies measures required to support alternatives to the car such as walking, cycling and public transport, and to promote accessibility and safety, together with measures that will be needed deal with the anticipated transport impacts of the development.</p>
	<p>Glossary: Vision-led approach</p> <p>An approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as ‘predict and provide’).</p>
	<p>Glossary: Reasonable future scenarios (for assessing potential highways impacts)</p> <p>A range of realistic transport scenarios tested in agreement with the local planning authority and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.</p>

2.1.2 The changes can be summarised as:

- A move to a 'vision-led' approach to transport strategies and the accompanying assessment of these. Developing a clear vision for access and connectivity for sites and identifying the means to achieve this.
- A greater emphasis on active travel and public transport, **prioritising** these transport modes to deliver the vision for a site.
- Mitigation of highway impacts through a vision-led approach.
- Consideration of a range of 'reasonable' scenarios, rather than a 'worst-case' in determining whether the impact of a development on the surrounding transport network is deemed to be severe. A move away from 'Predict and Provide' and focus on traditional highway improvements to mitigate impacts.

3 **Woollam Park Transport Strategy and Assessment**

Transport Vision

3.1.1 The access and movement vision for Woollam Park has been developed to enable new residents (and the surrounding communities) to prioritise more sustainable travel patterns supported by a set of comprehensive and meaningful measures and infrastructure interventions to achieve this vision.

Assessment Approach and Outcomes

3.1.2 In line with the vision-led approach to the assessment of highway impacts now cemented in the recently updated NPPF, multiple scenarios have been considered within the submitted Transport Assessment which reflect the potential range of modal splits which might be achieved with the appropriate infrastructure in place.

3.1.3 The assessment of highway impacts demonstrated there are already areas of congestion on the network with the Ancient Briton and King William IV junctions operating over capacity at present. An historical approach to forecast future year growth and proposed development travel demand would contribute towards a worsening in operation with the development impact deemed to be severe in NPPF terms.

3.1.4 The modal shift scenarios modelled demonstrate that with the provision of a comprehensive active travel network, as proposed, behavioural change is likely to be realised. This modal shift / vehicular reduction across the network is forecast to go a long way to offsetting the

development impacts. Furthermore, the benefits to active travel users are likely to be far reaching.

- 3.1.5 In the context of the existing operation, the residual impacts in these “*reasonable future scenarios*” allowing for modal shift and behavioural change are not deemed to be severe.

4 Summary

- 4.1.1 The published changes to the NPPF, in particular at Paragraph 116, cement the recent change in direction of approach to the developing transport strategies for development and the assessment of associated transport impacts, which has been evolving for some time.
- 4.1.2 Whilst there are scenarios modelled and reported in the submitted Transport Assessment which demonstrate the potential for severe impacts resulting from the proposed development, these are deemed to be overly robust and unlikely to be realised.
- 4.1.3 Reasonable future scenarios allowing for modal shift and behavioural change have been considered which do not result in a severe highway impact. These scenarios are deemed achievable based on the proposed comprehensive transport strategy put forward for the benefit of the development and surrounding communities.
- 4.1.4 Therefore it is deemed, based on current and recently published national policy, that there are no highways/transport related reasons why the development should be refused, as set out in the submitted Transport Assessment.

Appendix 4. Schedule of NPPF references included in the Woollam Park Planning Application

Blue underline identifies additions (including both replacements and insertions) and *Red strikethrough* shows deletions

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
Woollam Park Environmental Statement, December 2024	Policy Context	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 6.15	Chapter 15	No Change	No Change
	Section 7.16	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
		Section 12	No Change	No Change
		Paragraph 135	No Change	No Change
	Footnote 16	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 7.16	Section 12	No Change	No Change
		Paragraph 135	No Change	No Change
	Section 7.17	Section 15	No Change	No Change
		Paragraph 180	Paragraph 187	Paragraph reference amended
		Paragraph 182	Paragraph 189	Paragraph reference amended and text amended as follows: <i>182. 189. "Great weight should be given to conserving and enhancing landscape and scenic beauty in ...Areas of Outstanding Natural Beauty <u>National Landscapes</u> which have the highest status of protection in relation to these issues..."</i>
		Paragraph 186	Paragraph 193	Paragraph reference amended
	Section 7.18	Section 16 Conserving and enhancing the historic environment	No Change	No Change
	Section 7.79	Paragraph 180(a)	Paragraph 187(a)	Paragraph reference amended
	Section 7.81	Paragraph 180(a)	Paragraph 187(a)	Paragraph reference amended
	Section 8.6	Paragraph 180	Paragraph 187	Paragraph reference amended
Section 8.7	Paragraph 181	Paragraph 188	Paragraph reference amended	
	Footnote 62	Footnote 65	Footnote reference amended and text amended as follows:	

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
				Footnote 62 <u>65</u> "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development. "
	Section 9.19	Definition of 'Significance (for heritage policy)'	No Change	No Change
	Section 9.33	Annex 2 Glossary	No Change	No Change
	Section 10.6	Paragraph 189	Paragraph 196	Paragraph reference amended
	Section 10.7	Paragraph 190	Paragraph 197	Paragraph reference amended
	Section 11.9	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 11.112	Paragraph 57	Paragraph 58	Paragraph reference amended
	Section 13.10	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 13.11	Paragraph 8(c)	No Change	No Change
	Section 13.12	Paragraph 216(b)	Paragraph 223(b)	Paragraph reference amended
	Section 14.10	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 15.9	Paragraph 108	Paragraph 109	Paragraph reference amended and text amended as follows: 108. <u>109.</u> "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that <u>using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.</u> <u>This should involve:</u> ... (e) <u>(f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account</u> – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and "
	Section 16.10	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
	Footnote 59	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 17.9	Paragraph 8c	No Change	No Change
		Paragraph 180	Paragraph 187	Paragraph reference amended
		Paragraph 191	Paragraph 198	Paragraph reference amended
		Paragraph 192	Paragraph 199	Paragraph reference amended
	Footnote 96	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 17.113	Paragraph 191	Paragraph 198	Paragraph reference amended
Paragraph 192		Paragraph 199	Paragraph reference amended	
Appendix 1.1 Scoping Report	Section 4.188	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
Appendix 6.3 Biodiversity Net Gain Report	Section 2.11	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
		Paragraph 186(a)	Paragraph 193(a)	Paragraph reference amended
	Exemptions	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.14	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
		Paragraph 180(d)	Paragraph 187(d)	Paragraph reference amended and text amended as follows: 180(d) <u>187(d)</u> . "minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures <u>and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;...</u> "
Paragraph 185(b)	Paragraph 192(b)	Paragraph reference amended		
Appendix 6.8 Arboricultural Impact Assessment	Section 2.0	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.2	Paragraph 10	No Change	No Change
		Paragraph 11	No Change	No Change
	Section 2.3	Paragraph 136	No Change	No Change – refer to Footnote 53 change below
		Footnote 53	Footnote 52	Footnote reference amended
		Paragraph 186(c)	Paragraph 193(c)	Paragraph reference amended
		Footnote 67	Footnote 70	Footnote reference amended
Paragraph 186(d)	Paragraph 193(d)	Paragraph reference amended		

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
	Section 2.4	Paragraph 186(c)	Paragraph 193(c)	Paragraph reference amended
		Footnote 67	Footnote 70	Footnote reference amended
	Section 3.15	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
		Definition of 'Ancient or veteran tree'	No Change	No Change
	Footnote 5	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 3.23	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
Definition of 'Ancient or veteran tree'		No Change	No Change	
Appendix 8.1 Agricultural Land Classification Report	Section 5.10	Footnote 58	Footnote 65	Footnote reference amended
Appendix 9.1 Historic Environment Desk Based Assessment	Section 2.3	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 3.6	Section 16	No Change	No Change
		Section 16 Policies	No Change	No change to the policy direction of Section 16
	Section 3.7	Section 16	No Change	No change to the policy direction of Section 16
	Section 3.8	Paragraph 200	Paragraph 207	Paragraph reference amended
	Section 3.9	Paragraph 209	Paragraph 216	Paragraph reference amended
	Section 3.10	Definition of 'Heritage Asset'	No Change	No Change
	Section 3.11	Definition of 'Archaeological Interest'	No Change	No Change
	Section 3.12	Definition of 'Designated Heritage Assets'	No Change	No Change
	Section 3.13	Definition of 'Significance (for heritage policy)'	No Change	No Change
Section 3.14	Definition of 'Setting of a heritage asset'	No Change	No Change	
Section 3.20	Paragraphs 205-208	Paragraphs 212-215	Paragraph references amended	

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
	Section 3.21	Paragraphs 199-202	Paragraphs 207-210	Paragraph references amended
	Section 3.25	Paragraph 202	Paragraph 215	Paragraph reference amended
		Paragraph 8	No Change	No Change
	Section 3.30	Annex 2 Glossary	No Change	No Change
	Section 5.5	Paragraph 199	Paragraph 207	Paragraph reference amended
	Appendix B – Field Walking Report, Section 3.1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Appendix B – Field Walking Report, Section 9	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
Appendix 10.1 Phase 1 Geo-environmental desk-based study	Section 3.1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 3.3	Paragraph 189	Paragraph 196	Paragraph reference amended
	Section 3.4	Paragraph 190	Paragraph 197	Paragraph reference amended
Appendix 11.1 Flood Risk Assessment and Drainage Strategy	Section 4.1.1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 4.1.2	Paragraph 173	Paragraph 181	Paragraph references amended
	Section 4.1.3	Paragraph 175	Paragraph 182	Paragraph references amended and text amended as follows: <i>175-182. "Major developments Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development unless there is clear evidence that this would be inappropriate. The systems used should:</i> a) take account of advice from the Lead Local Flood authority; b) have appropriate proposed minimum operational standards;

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
				<p>c) <i>have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.;</i>and</p> <p>d) where possible, provide multifunctional benefits."</p>
	Section 5.11.1	Paragraph 168	Paragraph 174	<p>Paragraph references amended and text amended as follows into three separate Policies (173, 174 and 175):</p> <p><u>173. "A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below."</u></p> <p>168-174. <u>"Within this context</u> the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential test approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p><u>175. "The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."</u></p>
	Section 5.11.4	Paragraph 172	Paragraph 180	Paragraph references amended
	Section 5.11.7	Annex 3 Flood Risk Vulnerability Classification	No Change	No Change
Appendix 12.1 Health Impact Assessment	Section 5.2	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 5.3	Paragraph 7	No Change	No Change

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
		Paragraph 8	No Change	No Change
	Section 5.5	Section 8	No Change	No Change
		Paragraph 96	No Change	Text amended as follows: “96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which: <ul style="list-style-type: none"> a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles <u>lives, through both promoting good health and preventing ill-health</u>, especially where this would address identified local health and well-being needs <u>and reduce health inequalities between the most and least deprived communities</u> – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”
		Paragraph 97	Paragraph 98	Paragraph references amended
	Section 5.6	Paragraph 123	Paragraph 124	No Change
		Paragraph 128(e)	Paragraph 129(e)	Paragraph reference amended and text amended as follows: 128: 129(e) . “the importance of securing well-designed and beautiful , attractive and healthy places.”
		Paragraph 135(f)	No Change	No Change

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
	Section 5.12 – Section 5.13	Reference to proposed amendments to the NPPF	Sections superseded	Sections superseded by revised NPPF published on 12 December 2024
Appendix 15.1 Transport Assessment	Section 2.1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.1.1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.1.2	Paragraph 114	Paragraph 115	Paragraph reference amended and text amended as follows: 114. <u>115.</u> “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, <u>given sustainable transport modes are prioritised taking account of the vision for the site,</u> the type of development and its location; b) <i>safe and suitable access to the site can be achieved for all users;</i> c) <i>the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code, and</i> d) <i>any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree <u>through a vision-led approach.</u></i> ”
	Section 2.1.3	Paragraph 115	Paragraph 116	Paragraph reference amended and text amended as follows: “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, <u>following mitigation,</u> would be severe, <u>taking into account all reasonable future scenarios.</u> ”
Section 2.1.4	Paragraph 116	Paragraph 117	Paragraph reference amended	

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
	Section 2.1.5	Paragraph 117	Paragraph 118	Paragraph reference amended and text amended as follows: "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed <u>and monitored</u> ."
	Section 2.1.6	Paragraph 114	Paragraph 115	Paragraph reference amended and text amended as follows: 114. <u>115.</u> "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that a) appropriate opportunities to promote sustainable transport modes can be—or have been—taken up, <u>given sustainable transport modes are prioritised taking account of the vision for the site,</u> the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code, and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree <u>through a vision-led approach</u> ."
	Section 2.1.7	Paragraph 115	Paragraph 116	Paragraph reference amended and text amended as follows: 115. <u>116.</u> "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, <u>following mitigation,</u> would be severe, <u>taking into account all reasonable future scenarios</u> ."
	Section 10.1.2	Section 9	No Change	No Change

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
	Section 11.2.2	Paragraph 115	Paragraph 116	Paragraph reference amended and text amended as follows: 115 . <u>116</u> . “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, <u>following mitigation</u> , would be severe, <u>taking into account all reasonable future scenarios</u> .”
	Section 11.2.5	Paragraph 115	Paragraph 116	Paragraph reference amended and text amended as follows: 115 . <u>116</u> . “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, <u>following mitigation</u> , would be severe, <u>taking into account all reasonable future scenarios</u> .”
Appendix 16.2 Legislation Policy and Guidance related to noise and vibration	Section 2.8	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.11	Paragraph 180(e)	Paragraph 187(e)	Paragraph reference amended
	Section 2.12	Paragraph 191(a) and (b)	Paragraph 198(a) and 198(b)	Paragraph reference amended
	Section 2.13	Paragraph 193	Paragraph 200	Paragraph reference amended
Appendix 16.6 Site Suitability Assessment	Section 9.12	Paragraph 180	Paragraph 187	Paragraph reference amended
		Paragraph 191	Paragraph 198	Paragraph reference amended
		Paragraph 193	Paragraph 200	Paragraph reference amended
Appendix 17.2 Air Quality Policy Context	Section A.17.2.12	Paragraph 8(c)	No Change	No Change
	Section A.17.2.13	Paragraph 180(e)	Paragraph 187(e)	Paragraph reference amended
	Footnote 53	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section A.17.2.14	Paragraph 191	Paragraph 198	Paragraph reference amended
	Section A.17.2.15	Paragraph 192	Paragraph 199	Paragraph reference amended
Sustainability and Energy Statement, December 2024	Footnote 1	National Planning Policy Framework 2023	National Planning Policy Framework 2024	NPPF revised and published on 12 December 2024
	Section 2.2.1	Paragraph 7	No Change	No Change
		Paragraph 8	No Change	No Change
Sports Justification Report, December 2024	Section 1.1	Paragraph 103(b)	Paragraph 104(b)	Paragraph reference amended
	Section 1.9	Paragraph 103	Paragraph 104	Paragraph reference amended and text amended as follows: 103 . <u>104</u> . “Existing open space, sports and recreational buildings and land, including playing fields <u>and formal play spaces</u> , should not be built on unless:

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
				<ul style="list-style-type: none"> a) <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> b) <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> c) <i>the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."</i>
	Section 4.6	Paragraph 103(b)	Paragraph 104(b)	Paragraph reference amended
		Paragraph 103	Paragraph 104	Paragraph reference amended and text amended as follows: 103. <u>104.</u> "Existing open space, sports and recreational buildings and land, including playing fields <u>and formal play spaces</u> , should not be built on unless: <ul style="list-style-type: none"> a) <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> b) <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> c) <i>the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."</i>
	Section 4.18	Paragraph 103(b)	Paragraph 104(b)	Paragraph reference amended
		Paragraph 103	Paragraph 104	Paragraph reference amended and text amended as follows: 103. <u>104.</u> "Existing open space, sports and recreational buildings and land, including playing fields <u>and formal play spaces</u> , should not be built on unless: <ul style="list-style-type: none"> a) <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i>

Planning Application Document	Section / Paragraph Reference	NPPF Reference Cited	NPPF Revised Reference	Change(s)
				<ul style="list-style-type: none"> b) <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> c) <i>the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."</i>
	Table 2: Accordance with policy	Paragraph 103(b)	Paragraph 104(b)	Paragraph reference amended
	Section 4.27	Paragraph 103(b)	Paragraph 104(b)	Paragraph reference amended
	Section 8.4	Paragraph 103	Paragraph 104	<p>Paragraph reference amended and text amended as follows:</p> <p>103. <u>104.</u> "Existing open space, sports and recreational buildings and land, including playing fields <u>and formal play spaces</u>, should not be built on unless:</p> <ul style="list-style-type: none"> a) <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> b) <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> c) <i>the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."</i>

CARDIFF OFFICE

22 Cathedral Road, Cardiff, CF11 9LJ
02920 349737

admin@lrmpanning.com
lrmpanning.com

© LRM Planning Limited 2025

EXETER OFFICE

Winslade Manor, Manor Drive, Clyst St
Mary, Exeter EX5 1FY, 01392 690060



Registered Office: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ
Registered in England and Wales No 08618388 VAT Reg No 196 5837 49

