POETS
Planning Oxfordshire's Environment and Transport Sustainably

NPFF Consultation Spring 2026

Comments by POETS (Planning Oxfordshire's Environment and Transport Sustainably)

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POETS (Planning Oxfordshire's Environment & Transport Sustainably) are a voluntary think tank of professionals providing analysis, commentary and ideas on sustainable planning and transport for Oxfordshire.

POETS' believe that land use and transport planning in the public interest, underpinned by a strong democratic mandate, is essential for joining up infrastructure, homes, work and leisure opportunities. At its best it can deliver transformational change with huge benefits to society, the environment and the economy, helping address climate change and promote sustainable development.

POETS are concerned about the overall direction of the proposed National Planning Policy Framework (NPPF) changes. **The Government is consulting on what would be the biggest (and potentially most harmful) shake-up of planning since 2012.** As proposed, the Framework would:

- **Undermine ambitions on climate change policy**
- **Give inadequate recognition to the links between health & planning, including the importance of urban green spaces**
- **Reduce public participation and local decision-making**
- **Fail to deliver genuine vision-led transport & planning**
- **Fail to give adequate protection to landscape character and our highest quality farmland, undermining food security**
- **Offer inadequate prioritisation of social housing.**

Furthermore, the Government has not seriously tackled car dominance; policy is already weaker than it was a couple of decades ago and this is a big part of why national carbon targets are not being met. The single focus on housing undermines the ability to push against car-dependent homes. The emphasis on 'vision-led' planning would be welcome – except that it is currently so ill-defined in national guidance that the Government claims its huge road building programme is 'vision-led! As with Oxfordshire County Council's excellent Local Transport & Connectivity Plan, we find that bold visions for prioritising walking, cycling, and buses do not, alas, translate into the allocation of money or space. This is directly related to the Government's fixation on market housing provided by the big developers. The result is that vast amounts of

money are spent on creating extra capacity for private cars to give increased capacity for a decade or so – after which we are in a much worse position than before.

Our message to Government is that they should stop relying on the major housebuilders to meet housing need - this has not worked in the past and will not work in the future. Volume housebuilders and the private sector are inevitably primarily concerned with profits and returns to shareholders rather than meeting housing needs/targets. The only time 300,000 houses a year (the Government's current ambition) have been built is when roughly half of them were council houses. The most urgent need is clearly for social housing for rent (the provision of which would also save billions on housing benefit). Meanwhile, the current definition of "affordable" housing means it's often anything but.

POETS believe the focus should be on **good planning as the solution**, listening to the many experts who say that social housing and active/public travel are the way to address climate and health, thereby supporting a successful economy. Then we might get an NPPF update that actually works.

What is missing is as critical as what is currently included

POETS are generally concerned about the narrowness of vision of the NPPF, for example omitting reference to such things as national security or environmental targets.

Climate

We support the Town & Country Planning Association's (TCPA's) view that: "*the framework, when read as a whole, creates a much more permissive planning regime, subject only to a very limited number of policy safeguards, which do not include climate mitigation or adaptation. As drafted, the expanded presumption in favour of development would undermine strategic approaches to locating development in the most climate resilient locations, weaken the application of local policy requirements on climate, and provide no avenue for refusing development on the grounds of creating unacceptably high levels of carbon emissions*"

We are concerned that the draft Framework limits the information that planning authorities can ask for to help determine planning applications, in particular climate risk assessments and evidence on carbon emissions. The strict limitations on local standards on energy efficiency are also entirely inappropriate (see below).

Health & green spaces

A clear, specific purpose for planning to promote good health and reduce health inequalities should be re-instated.

POETS are concerned about the potential impact on urban areas in terms of loss of greenspace. Permitted Development Rights (which have led to unacceptably poor housing) are kept and the requirements to keep open/green space in redeveloped plots reduced. This is likely to have a potentially negative effect on access to open and green space and physical and mental health in urban areas. Given the vast majority of the population live in urban areas, there needs to be much more protection included.

Local democracy

We understand that the TCPA is calling for an entire new chapter to be introduced addressing the issues of public participation and community-led development, which POETS would roundly

endorse. This is particularly vital within the context of Local Government re-organisation and a new two-tier system of strategic authorities yet further distanced from local residents.

Transport

We welcome the stated intention to move to vision-led transport planning. However, we share the concerns of Transport for New Homes (TfNH) that, in reality, the NPPF is worded to ensure that housing targets trump all other considerations, with developers calling the shots on locations rather than public sector planners. As TfNH say: "To bring the 'vision' into the real world, a new approach is needed. We would like to see a much more evidenced methodology as to where and how much to build, taking into account jobs, housing needs of different sections of the population, coordinated investment in mass transit systems, access to services and so on."

Responses to specific questions

Question 6) *Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?*

&

Question 7) *Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?*

Partly agree.

POETS support the principle of spatial development strategies across appropriate regions but we are concerned about the areas to which they will be applied. We seem likely to have a mess of sub-regions/Mayoral authorities; this is in marked contrast to the logical set of city regions proposed by the Royal Commission on Local Government (Redcliffe Maud report) almost 60 years ago.

Question 18) *Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?*

Strongly disagree

This policy would place strict limitations on local standards on energy efficiency and embodied carbon which have traditionally been within scope of local plans. POETS would welcome the setting of national *minimum* standards. However, we believe there must be scope for local authorities to set their own, higher, standards in response to local circumstances and the wishes of local residents.

We have a particular concern about Salt Cross Garden Village in Oxfordshire, where residents and West Oxfordshire District Council have fought a long, and ultimately successful campaign to bring forward a genuinely carbon neutral development. This policy might not only hinder further similar innovative projects being brought forward, but could yet open the door for the developer to wriggle free of existing commitments. If the policy is to go ahead, it should be made clear that it will not apply to projects that have already gone through the plan process.

Question 56: *Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?*

Strongly agree

POETS support this measure as it will widen where affordable housing policies apply, so more rural communities will benefit.

Question 60: *Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more?* Agree

& Question 62: *Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?* Yes

POETS agree with these proposals in principle, but support CPRE's call for the NPPF to mandate at least 10% social housing in all major new housing developments of more than 100 homes until Local Plans are updated. This is especially important given the likely delays to plan making resulting from local government reorganisation. Indeed, if there were to be proper funding for social housing for rent, as in the days when the country was building 300,000 homes a year, this would lead to a reduction of many billions of pounds in the amount being spent on housing benefit and other indirect savings (not least to the NHS).

Question 133: *Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?*

***& Question 136**: Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?*

Strongly disagree

It's critical that new housing and transport infrastructure are linked, so railway stations are a good place to start when considering development options. However, that shouldn't mean all other considerations go out of the window. The impacts on existing communities, nature, landscape, Green Belt, water, energy and other vital services, including other transport options such as cycling and walking, must all be taken into account. Moreover, rail cannot serve the multiplicity of origins and destinations that need to be accessed. To make the best use of rail will require a fundamental shift in transport investment, with a massive increase in the amount of both space and funding dedicated to active travel (particularly cycling), buses and (in some areas) trams.

POETS do not support the blanket approach proposed here which in reality could mean losing countryside and further encroachment on Green Belt land. Simply allowing more development on Green Belt land that is close to a railway station does not allow for the fact that there is no guarantee the station itself offers a good range of rail services, nor that it is well-connected to an existing settlement or services. This risks actually increasing car use, as well as removing easy access to open countryside.

Question 145: *Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?*

Strongly disagree

The proposed policy would give inadequate protection to high quality farmland and local wildlife sites. Major development should only be allowed in the Green Belt if it is agreed through the new spatial development strategies and the term 'grey belt' should be removed from national planning policy.

Question 181: *Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?*

Partly agree and partly disagree.

N2 paragraph 1(a) should be amended to refer to 'landscape character and value'.

Policy N2 paragraph 1(b) should be changed to state a firm presumption against development of the highest quality (grades 1-3) farmland.

In Conclusion

As we have commented earlier, the proposed NPPF changes are potentially very harmful.

Our message to government is that it should focus on good, pro-active local authority planning in order to address the existential challenges of climate and health, thereby supporting a successful economy.

We believe that the current NPPF proposals should be withdrawn and thoroughly reconsidered in the light of these and other comments from relevant planning, transport and environmental bodies.