

# THE NPPF IN PRACTICE

HOW PLANNING APPEAL  
DECISIONS ARE INTERPRETING THE  
GUIDANCE 18 MONTHS ON.

**SASHA WHITE Q.C.**

## STRUCTURE OF LECTURE

- 1. INTRODUCTION.**
- 2. KEY SECRETARY OF STATE DECISIONS.**
- 3. KEY INSPECTOR DECISIONS ON NPPF SINCE ITS PUBLICATION.**
- 4. THE FUTURE**
- 5. SUMMARY AND CONCLUSION**



## PART 1

# INTRODUCTION

**DOWNING  
STREET SW1**  
CITY OF WESTMINSTER



## PART 1 - INTRODUCTION

# WHY DID THE GOVERNMENT BRING IN THE NPPF?<sup>L</sup><sub>C</sub>

- **DAVID CAMERON – 6 SEPTEMBER 2012.**
  - *THIS GOVERNMENT IS SERIOUS ABOUT DOING ALL IT CAN TO KICK START THE ECONOMY.*
  - *A COMPREHENSIVE PLAN TO UNLEASH ONE OF THE BIGGEST HOUSEBUILDING PROGRAMMES THIS COUNTRY HAS SEEN IN A GENERATION*
- **NICK BOLES – PLANNING MINISTER – 10 JANUARY 2013**
  - *THERE HAS BEEN A DECADES LONG FAILURE TO BUILD ENOUGH HOUSES*
  - *THERE HAS BEEN A DECADES LONG REFUSAL TO RELEASE ENOUGH LAND FOR DEVELOPMENT*

# GROWTHISM V LOCALISM



- WHAT THE DECISIONS ARE SHOWING IS THAT ECONOMIC GROWTH IS AN OVERRIDING FACTOR IN MOST CASES.
- THERE IS A CLEAR DIRECTION OF TRAVEL TOWARDS GRANTING MORE CONSENTS.
- LOCALISM HAS BEEN SIDELINED CONSIDERABLY.
- GOVERNMENT'S PERCEPTION IS THE PLANNING SYSTEM IS OF FUNDAMENTAL IMPORTANCE TO ECONOMIC GROWTH AND EXPANSION.
- NPPF IS SEEN AS THE KEY DRIVER FOR THE UTILISATION OF THE PLANNING SYSTEM TO BRING ABOUT ECONOMIC GROWTH.
- IN A BALANCING EXERCISE THE DECISIONS SHOW MUCH MORE WEIGHT IS BEING GIVEN TO ECONOMIC GROWTH ["GROWTHISM"] THAN THE VIEWS OF THE LOCAL COMMUNITY ["LOCALISM"]

## PART 2

**KEY SECRETARY OF STATE DECISION  
LETTERS SINCE MARCH 2012.**





# PART 2 – THE KEY POST NPPF SECRETARY OF STATE DECISIONS



- HOUSING CASES

- CASE 1 - **BISHOPS CLEEVE** – 16 JULY 2012.
- CASE 2 - **WINCHESTER** – 2 OCTOBER 2012.
- CASE 3 – **SANDBACH** – 6 DEC 2012.
- CASE 4 – **NORTH TYNESIDE** – 3 JULY 2013.
- CASE 5 - **SHEFFIELD** – 18 JULY 2013.

- SPORT:

- CASE 6 - **WAKEFIELD** – 20 JUNE 2012.

- ENERGY:

- CASE 7 - **MORELAND ENERGY**– 28 JUNE 2012.

- RETAIL:

- CASE 8 **LANCASTER** - 16 AUGUST 2012.
- CASE 9 - **DERBY** - 25 JULY 2012.
- CASE 10 - **MARGATE** – 13 JUNE 2013.

- INFRASTRUCTURE

- CASE 11 – **ST ALBANS STRATEGIC RAIL FREIGHT INFRASTRUCTURE** – 20 DEC 2012.
- CASE 12 - **M6 LINK ROAD, LANCASHIRE** – 19 MARCH 2013.

# S OF S CASE 1 – BISHOPS CLEEVE – 16 JULY 2012

## ALLOWED



- KEY POINT OF THIS DECISION IS THE EMPHASIS PLACED ON SATISFYING HOUSING LAND SUPPLY REQUIREMENTS NOW AND LPAS CANNOT RELY ON ARGUMENTS THAT HOUSING NEED WILL BE ADDRESSED IN TIME IN THE EMERGING DEVELOPMENT PLAN.
- PROPOSAL FOR 450 DWELLINGS IN GLOUCESTERSHIRE
- S OF STATE SAID THAT THE ***MOST SIGNIFICANT MATERIAL CONSIDERATION IS HOUSING LAND SUPPLY*** [PARAGRAPH 18 OF SoS DECISION]
- THE SECRETARY OF STATE CONSIDERS IT IS IMPORTANT FOR THE LPAS PREPARING THE JOINT CORE STRATEGIES **TO IDENTIFY THE NEEDS AND REQUIREMENTS IN THEIR AREA NOW**
- IT IS NOT THE SAME AS ALLOWING THEM TO POSTPONE THEIR OBLIGATION TO IDENTIFY AND MAINTAIN A 5 YEAR SUPPLY OF DELIVERABLE SITES.

# S OF S CASE 2 – WINCHESTER – ALLOWED – 2 OCT L 2012 C

- **KEY POINT OF DECISION – LPAS ARE REQUIRED TO PROVIDE 5 YEAR HOUSING LAND SUPPLY NOW AND NO PREMATURITY ARGUMENT.**
- 2000 DWELLINGS AND A LOCAL CENTRE, FOOD STORE AND OTHER ELEMENTS.
- CALL IN INQUIRY FROM 2010 WHICH WAS SUBJECT OF EXTENSIVE RSS LITIGATION.
- EMERGING CORE STRATEGY ALLOCATED BARTON FARM FOR 2000 DWELLINGS. SECRETARY OF STATE ATTACHES LIMITED WEIGHT TO IT.
- SUBMITTED TO EXAMINATION IN JUNE 2012.
- WITHOUT APPEAL SITE THE LPA CANNOT DEMONSTRATE 5 YEAR HOUSING LAND SUPPLY AND THEREFORE THE APPEAL PROPOSAL IS NECESSARY TO PROVIDE AN ASSURED SUPPLY OF HOUSING
- IT PROVIDES COMPELLING JUSTIFICATION FOR THE RELEASE OF A RESERVE SITE UNDER LP POLICY.
- DECISION NOT PREMATURE IN THE LIGHT OF THE EMERGING CS.

# SECRETARY OF STATE CASE 3 – SANDBACH – 6 DECEMBER 2012



- **KEY POINT IS SIGNIFICANT WEIGHT IS GIVEN TO HLS SHORTFALL.**
- SECRETARY OF STATE DECISION CONCERNING 269 HOUSES IN CHESHIRE.
- KEY CONCLUSION OF INSPECTOR WAS THAT THERE EXISTED SIGNIFICANT HOUSING LAND SUPPLY SHORTFALL OF BETWEEN 2.75 AND 3.25 YEARS SUPPLY.
- THE APPEAL WAS ALLOWED.
- SECRETARY OF STATE CONCLUDED THAT:
  - THE SECRETARY OF STATE GAVE SIGNIFICANT WEIGHT TO THE SHORTFALL IN HOUSING SUPPLY AND A *SIGNIFICANT FACTOR IN SUPPORT OF THE PROPOSED DEVELOPMENT*
  - SECRETARY OF STATE ALSO NOTED THAT THE FRAMEWORK SET OUT THE NEED TO BOOST *SIGNIFICANTLY THE SUPPLY OF HOUSING.*
  - NB SITE NOT SO SUBSTANTIAL AS TO JUSTIFY A FINDING OF PREMATURETY AGAINST THE DEVELOPMENT.

# S OF S CASE 4 – NORTH TYNESIDE 3 JULY 2013 –

## ALLOWED



- **KEY POINT IS CONTRIBUTION TO HLS FROM THE SCHEME.**
- HOUSING SCHEME FOR 450 HOUSES AND EXTENSION TO RISING SUN COUNTRY PARK,
- LPA REFUSED PERMISSION.
- 5 YEAR HOUSING LAND SUPPLY SHORTAGE AND THE LPA ACCEPT THAT NEED FOR GREENFIELD RELEASES TO MEET THAT SHORTFALL.
- PARAGRAPH 49 OF THE FRAMEWORK APPLIES.
- ALSO NEED FOR AFFORDABLE HOUSING.
- THE PROPOSAL WOULD ALSO BRING BENEFITS IN THE FORM OF A SUBSTANTIAL EXTENSION TO EXISTING COUNTRY PARK.
- THEREFORE THE PROPOSAL WOULD POSITIVELY CONTRIBUTE TO BOOSTING THE BOROUGH'S SUPPLY OF HOUSING.

# S OF S CASE 5 – SHEFFIELD – 18 JULY 2013

## ALLOWED



- **KEY POINT IS THAT REGENERATION OF MAJOR CITIES AND SHORTAGE OF HLS WEIGH STRONGLY IN FAVOUR OF THE GRANT OF PLANNING PERMISSION**
- PLANNING APPLICATION FOR 387 HOUSES AND FORMATION OF TWO PLAYING FIELDS.
- AGREED ABSENCE OF A FIVE YEAR HOUSING SUPPLY.
- COUNCIL VERY CONCERNED ABOUT THE PROPOSED DESIGN OF THE DEVELOPMENT.
- DESIGN WOULD BE DIFFERENT TO THAT IN THE SURROUNDING AREA.
- ACCEPTED THAT THE SCHEME WOULD NOT BE INNOVATIVE ARCHITECTURE BUT NEITHER WHEN THE DEVELOPMENT CONSIDERED AS A WHOLE WOULD IT BE POOR DESIGN.
- THE PROPOSAL WOULD BE A HIGH QUALITY, SUSTAINABLE NEIGHBOURHOOD.
- PROPOSAL WOULD CONTRIBUTE TO THE REGENERATION OF SHEFFIELD.

# S OF S CASE 6 – WAKEFIELD – SoS – 20 JUNE 2012 L DEALING WITH SPORTS PROVISION C

- **KEY POINT – COMMUNITY BENEFITS FROM STADIUM DEVELOPMENT DO AMOUNT TO VSC IN THE GREEN BELT**
- PROPOSAL FOR COMMUNITY STADIUM, GAMES AREA AND B1 UNITS AND HOTEL IN GREEN BELT TO BE USED BY WAKEFIELD TRINITY WILDCATS RLFC. PROPOSAL NOT IN ACCORDANCE WITH THE DEVELOPMENT PLAN.
- PROPOSAL WOULD CAUSE A SIGNIFICANT AMOUNT OF HARM TO THE GREEN BELT AND NOT APPROPRIATE DEVELOPMENT IN THE GREEN BELT.
- HOTEL AND A3 UNIT DO NOT COMPLY WITH TOWN CENTRES POLICY BUT SHOULD BE PROVIDED TO ENABLE FUNDING OF THE STADIUM AND THE COMMUNITY ELEMENTS.
- INSPECTOR CONCLUDED NO SITE AVAILABLE OUTWITH GREEN BELT THAT COULD ACCOMMODATE THE WHOLE DEVELOPMENT.
- SOS CONCLUDED THAT THE BENEFITS OF A COMMUNITY STADIUM DO AMOUNT TO VSC.
- SOS REQUIRED SECTION 106 DEALING WITH THE CONSTRUCTION OF THE STADIUM.



# S OF S CASE 7 – MORELAND ENERGY, NORTH YORKSHIRE – ENERGY INFRASTRUCTURE. 28 JUNE 2012.



- **KEY POINT IS THE WEIGHT GIVEN BY SECRETARY OF STATE TO THE ECONOMIC BENEFITS OF THE PROJECT.**
- GAS PROCESSING FACILITY ON EDGE OF NATIONAL PARK.
- REPRESENTATIONS INVITED IN THE LIGHT OF NPPF.
- S OF S ATTACHES GREAT WEIGHT TO THE BENEFITS OF THE MINERAL EXTRACTION INCLUDING THE NATIONAL ECONOMY OF £37.5 MILLION. [PARAGRAPH 25]
- THE NATIONAL BENEFITS OF THE SCHEME ARE SUFFICIENT TO OUTWEIGH THE MORE LIMITED HARMS BY WAY OF VISUAL IMPACT ON THE LANDSCAPE.
- THE SECRETARY OF STATE ATTACHES GREAT WEIGHT TO THE BENEFITS PROVIDED BY THE PROPOSAL [PARAGRAPH 33]

# S OF S CASE 8 - LANCASTER – RETAIL CASE – REFUSED



- **KEY POINT – OUT OF CENTRE PROPOSAL REFUSED BECAUSE OF SEQUENTIALLY PREFERABLE SITE IN TOWN CENTRE.**
- NEW FOODSTORE OF 7250 SQUARE METRES GROSS IN OoC LOCATION 2.8 KM TO THE SOUTH OF THE CITY CENTRE.
- RIVAL SITE FOR A NEW SUPERMARKET 3230 SQUARE METRES GROSS JUST TO THE NORTH OF THE APPEAL SITE WHICH HAD JUST RECEIVED PLANNING PERMISSION.
- LESS THAN 50% OF CONVENIENCE GOODS EXPENDITURE RETAINED IN THE CATCHMENT AREA. [SOUTH OF THE RIVER LUNE]
- IN TERMS OF SEQUENTIAL APPROACH THERE WAS AN ALTERNATIVE SITE WHICH IS CANAL CORRIDOR NORTH WHICH IS ON THE EDGE OF LANCASTER'S MAIN SHOPPING CENTRE AND REDEVELOPMENT TO INCLUDE 33500 INCLUDING A FOODSTORE OF SOME 5000 SQUARE METRES GROSS. CANAL CORRIDOR NORTH SITE IS SEQUENTIALLY PREFERABLE TO THE APPEAL SITE FOR THE PROPOSED RETAIL DEVELOPMENT.
- ALSO CONTRAVENES THE CONSIDERATION OF NEW PLANNED RETAIL INVESTMENT IN THE CENTRE.

# S OF S CASE 9 – DERBY – 25 JULY 2012 – **ALLOWED.**



## **KEY POINT IN ORDER TO REFUSE A RETAIL SCHEME ON IMPACT GROUNDS WHAT IS REQUIRED BY THE NPPF IS TO FIND A SIGNIFICANT IMPACT ON THE CENTRE.**

- MIXED USE REGENERATION SCHEME KNOWN AS THE NIGHTINGALE QUARTER INCLUDING A CONVENIENCE GOODS STORE, RESIDENTIAL, OFFICES. THE SITE WAS THE FORMER DERBYSHIRE ROYAL INFIRMARY OF AROUND 7 HECTARES JUST SOUTH OF THE DERBY CITY CENTRE AND CONSIDERED EoC IN RETAIL TERMS.
- ONLY ISSUE WAS THE EFFECT OF THE PROPOSAL ON LISTED BUILDINGS AND CONSERVATION AREAS BETWEEN APPELLANT AND THE LPA.
- AGREED BY LPA THAT NO CENTRE SITES WHICH WERE AVAILABLE, SUITABLE OR VIABLE.
- NOT ENOUGH TO SAY THERE WILL BE AN IMPACT, WHAT IS REQUIRED BY THE NPPF IS A SIGNIFICANT IMPACT ON TURNOVER WHICH WOULD BE LIKELY TO UNDERMINE THE VITALITY AND VIABILITY OF THE CITY CENTRE.

# S OF S CASE 10 – MARGATE – 13 JUNE 2013 ALLOWED.



- **KEY POINT – NPPF CAN SUPPORT OoC RETAIL PROPOSALS THAT WILL ENSURE CLAWBACK OF EXPENDITURE.**
- SUPERSTORE PLANNING APPLICATION IN OoC LOCATION.
- LPA VOTED IN FAVOUR OF THE SCHEME AFTER APPEAL SUBMITTED.
- RETENTION OF CONVENIENCE GOODS EXPENDITURE IS STRIKINGLY LOW [PARA 16]
- PROPOSALS OFFER OPPORTUNITY TO CLAW BACK EXPENDITURE IN MARGATE.
- MARGATE ALSO ECONOMICALLY DEPRESSED AND THE JOB CREATION OPPORTUNITIES OF THE DEVELOPMENT ARE PARTICULARLY IMPORTANT.
- PROPOSAL WOULD HAVE A POSITIVE BENEFIT TO THE HIGH STREET AND ENCOURAGE FOOTFALL ALONG THE SEAFRONT AND INTO THE HIGH STREET.
- PROPOSAL WOULD BE UNLIKELY TO HAVE SIGNIFICANT ADVERSE IMPACT ON MARGATE TOWN CENTRE.

# S OF S CASE 11 – ST ALBANS SRFI – 20 DEC 2012 ALLOWED.



- **KEY POINT – BENEFITS OF A SRFI WERE SUCH AS TO WEIGH HEAVILY IN FAVOUR OF THE PROPOSAL ALTHOUGH WITHIN GREEN BELT.**
- SECRETARY OF STATE MINDED TO ALLOW APPLICATION FOR STRATEGIC RAIL FREIGHT INFRASTRUCTURE FACILITY OF VERY SIGNIFICANT SCALE AND SIZE.
- SoS CARRIED OUT BALANCING EXERCISE.
- HARM TO GREEN BELT AND HARM TO SETTING OF ST ALBANS CONSIDERED SIGNIFICANT.
- BUT BENEFITS TO ECONOMY OF SRFI AND NO ALTERNATIVE LOCATION WEIGHED HEAVILY IN FAVOUR OF THE PROPOSAL.
- SUBJECT TO SECTION 106 AGREEMENT PERMISSION MINDED TO BE GRANTED.

# S OF S CASE 12 – M6 LINK ROAD, LANCASHIRE

## 19 MARCH 2013.



- **KEY POINT – PROVISION OF A KEY LINK ROAD CAN AMOUNT TO VERY SPECIAL CIRCUMSTANCES AS REQUIRED BY THE NPPF IN THE CASE OF INAPPROPRIATE DEVELOPMENT IN THE GREEN BELT.**
- CONSTRUCTION OF A NEW 4.8 KILOMETRE DUAL CARRIAGEWAY RUNNING FROM LANCASTER TO JUNCTION 34 OF THE M6 MOTORWAY AND ASSOCIATED PARK AND RIDE FACILITY.
- NEED FOR VSC REQUIRED TO JUSTIFY DEVELOPMENT IN THE GREEN BELT.
- IN THIS CASE, THE SoS CONCLUDES THAT THE ACHIEVEMENT OF THE BENEFITS BROUGHT ABOUT BY THE ROAD DO AMOUNT TO VERY SPECIAL CIRCUMSTANCES AND OUTWEIGH THE HARM TO THE GREEN BELT.
- THERE IS THEREFORE A COMPELLING CASE FOR AUTHORISING THE CONSTRUCTION OF THE LINK ROAD.

## PART 3

# KEY INSPECTOR DECISIONS



The Planning  
Inspectorate



# PART 3 – KEY INSPECTOR DECISIONS ON THE NPPF

## SINCE MARCH 2012.

- CASE 1 - ADDERBURY - 18 JUNE 2012.
- CASE 2 – SAPCOTE – 27 JUNE 2012.
- CASE 3 – HIGH PEAK – 23 AUGUST 2012.
- CASE 4- WINCANTON – 29 AUGUST 2012.
- CASE 5 – CRAMLINGTON – AUGUST 2013.

# INSPECTORS CASE 1 – ADDERBURY – REFUSED – JUNE 2012

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- **KEY POINT IS THAT THE PROPOSAL SHOULD NOT BE ALLOWED AS IT IS NOT CURRENTLY SUPPORTED BY THE LOCAL COMMUNITY AND THEREFORE DOES NOT COMPLY WITH PARAGRAPH 17 OF THE NPPF.**
- HOUSING PROPOSAL FOR 65 DWELLINGS.
- SUBSTANTIAL SHORTFALL IN HOUSING LAND SUPPLY CIRCA 3 YEARS.
- PARA 17 OF THE NPPF SEEKS TO EMPOWER LOCAL PEOPLE TO PRODUCE NEIGHBOURHOOD PLANS.
- LOCAL PARISH COUNCIL SEEKING TO PRODUCE A NEIGHBOURHOOD PLAN TO CONSIDER WHERE HOUSING SHOULD BE PUT IN THE VILLAGE.
- THE APPEAL SITE IS NOT THE ONLY APPEAL SITE THAT NEEDS TO BE CONSIDERED.
- THE PROPOSAL IS IN CLEAR CONFLICT WITH THE GUIDANCE IN PARAGRAPH 17 GIVEN THAT THIS PROPOSAL IS NOT CURRENTLY SUPPORTED BY THE LOCAL COMMUNITY.

## INSPECTORS CASE 2 - SAPCOTE, BLABY



- **KEY POINT IS THAT IF NO 5 YEAR HLS THEN PLANNING PERMISSION SHOULD BE GRANTED UNLESS THERE ARE DEMONSTRABLE AND SIGNIFICANT IMPACTS THAT OUTWEIGH THE BENEFITS AS SET OUT IN PARAGRAPH 14.**
- 111 DWELLINGS.
- LPA ACCEPTED THAT NO LONGER 5 YEAR HOUSING LAND SUPPLY.
- WHERE NO 5 YEAR HOUSING LAND SUPPLY THEN RELEVANT POLICIES FOR THE SUPPLY OF HOUSING SHOULD NOT BE CONSIDERED UP TO DATE.
- HOUSING POLICIES IN THE DEVELOPMENT PLAN THEREFORE HAVE TO BE CONSIDERED OUT OF DATE.
- PLANNING PERMISSION SHOULD BE GRANTED UNLESS THE ADVERSE IMPACTS OF DOING SO WOULD DEMONSTRABLY AND SIGNIFICANTLY OUTWEIGH THE BENEFITS WHEN ASSESSED AGAINST THE POLICIES IN THE FRAMEWORK.

# INSPECTORS CASE 3 – WINCANTON – 29 AUGUST 2012

- **KEY POINT THAT IT IS POSSIBLE WITHIN CONFINES OF PARAGRAPH 14 TO REFUSE SCHEME ON BASIS THAT HARM OUTWEIGHS BENEFITS EVEN IF HLS SHORTAGE.**
- 55 DWELLINGS OUTSIDE DEVELOPMENT BOUNDARY AND ONLY 3 YEAR HOUSING LAND SUPPLY CONCLUDED BY INSPECTOR
- COUNCIL CANNOT DEMONSTRATE 5 YEAR HOUSING LAND SUPPLY SO SHORTFALL IS SUBSTANTIAL.SO HOUSING POLICIES CONSIDERED OUT OF DATE.
- PP SHOULD BE GRANTED UNLESS ADVERSE IMPACTS SIGNIFICANTLY AND DEMONSTRABLY OUTWEIGH BENEFITS
- BUT THERE WERE MATERIAL CONSIDERATIONS THAT JUSTIFIED REFUSAL:
  - DEVELOPMENT TOO DEPENDENT ON PRIVATE CAR
  - HARM TO CHARACTER AND APPEARANCE OF THE AREA
- JUSTIFIED REFUSAL NOTWITHSTANDING HOUSING NEED.

## INSPECTOR CASE 4 – HIGH PEAK - 23 AUGUST 2012



- **KEY POINT – NO JUSTIFICATION OF REFUSAL OF PLANNING PERMISSION WHEN PREMATURETY ALLEGED IN RELATION TO AN EMERGIN CORE STRATEGY.**
- 105 DWELLINGS.
- CASE DEALS WITH ALLEGED PREMATURETY ARGUMENT MADE BY THE LPA BECAUSE OF EMERGING CORE STRATEGY.
- FRAMEWORK CONTAINS NO REFERENCE TO PREMATURETY.
- LOOK AT PPS 1 GENERAL PRINCIPLES DOCUMENT GUIDANCE IN PARAGRAPH 17 AND 18 OF DOCUMENT:
  - PROPOSED DEVELOPMENT IS SO SUBSTANTIAL OR THE CUMULATIVE EFFECT WOULD BE SO SIGNIFICANT.
- CURRENT CORE STRATEGY HAS BEEN ABANDONED.
- NO JUSTIFICATION OF REFUSAL ON PREMATURETY GROUNDS.

# INSPECTORS CASE 5 – CRAMLINGTON –



- **KEY POINT OF DECISION – HOUSING CAN BE PERMITTED ON EMPLOYMENT LAND WHERE THERE IS A SIGNIFICANT SHORTFALL IN THE 5 YEAR HOUSING LAND SUPPLY AND THERE WOULD NOT BE HARM TO THE SUPPLY OF EMPLOYMENT LAND.**
- PROPOSAL FOR 120 HOUSES AND 1.6 HECTARES OF EMPLOYMENT IN CRAMLINGTON ON LAND IDENTIFIED IN THE DEVELOPMENT PLAN FOR EMPLOYMENT USE.
- OLD WILKINSON SWORD SITE IN CRAMLINGTON.
- THE PROPOSAL WOULD DELIVER MUCH NEEDED HOUSING IN AN AREA THAT IS SERIOUSLY SHORT OF NEW HOUSING AND IN PARTICULAR AFFORDABLE HOUSING.
- AS SUCH IT WOULD BOOST THE SUPPLY OF HOUSING IN ACCORDANCE WITH PARAGRAPH 47 OF THE FRAMEWORK.

## PART 4 – THE FUTURE



- JUDICIAL INTERVENTION IN THE LIGHT OF TESCO STORES.
- FURTHER INSPECTORS DECISIONS IN THE LIGHT OF THE NPPF.
- APPEALS REVIEW BEING CARRIED OUT BY GOVERNMENT INCLUDING FAST TRACK PROCESS AND RECLAIMING OF JURISDICTION.
- CONTINUED ACTIVISM OF THE GOVERNMENT TO STIMULATE ECONOMIC GROWTH.
- FURTHER GUIDANCE BY THE EMERGENCE OF PRACTICE GUIDES.

## PART 5 – SUMMARY AND CONCLUSIONS



- PARAGRAPH 14 PRESUMPTION IS BEING IMPLEMENTED GENERALLY.
- PARTICULARLY IN RELATION TO HOUSING WHERE NO 5 YEAR SUPPLY.
- ECONOMIC DEVELOPMENT IS ALSO KEY – WAKEFIELD, ST ALBANS AND MORELAND ENERGY.
- RETAIL POLICY – PRIMACY OF SEQUENTIAL APPROACH AND TOWN CENTRE INVESTMENT.



# SUMMARY AND CONCLUSIONS

