

## MHCLG consultation on the National Planning Policy Framework: proposed reforms and other changes to the planning system

### Consultation introduction

- 1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

We support the Government's decision not to introduce statutory development management policies at this stage. While we agree with the principle of national development management policies (in particular, to provide certainty and avoid repetition), we believe their introduction should be kept under review until the impact of other changes is known (pages 10-11 of the consultation document).

There have been numerous changes to planning policy in recent years to speed up decision-making and deliver more housing. The constant change has made it difficult for Local Planning Authorities (LPAs) to prepare new local plans for their areas. This has led to out-of-date policies, which – conversely to Government's policy objectives, have caused inconsistent decision-making, increased uncertainty, and prompted an overall slowdown in housing delivery. Introducing an additional significant change at this stage may prompt further delays as LPAs take time to consider and adapt. This is likely to be a particular issue given that large numbers of LPAs are already under-resourced at present.

- 2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

Partly agree. The approach helps make the guidance accessible to different users and should therefore help all sizes of developer. While this is the case, it is important that the main aims of each policy are carried through from planning-making to decision-making. The two must be considered holistically to ensure consistency of decision-making. This should be carefully considered as part of a review when the first new local plans based on the new guidance proceed towards adoption.

**3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?** *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Neither agree nor disagree. While we accept that additional guidance may be required to support some policies, the NPPF is already supported by the PPG. It is important to ensure that there isn't repetition between the annexes and PPG. The introduction of annexes also means that users of the guidance need to review multiple documents/locations (NPPF, annex and PPG) in order to find the information they may be looking for. This expansion of the guidance could see the beginning of a return to the previous set of Planning Practice Guidance and Planning Policy Statements that pre-dated the original NPPF issued in 2012 (which was published precisely to streamline national guidance to help deliver more development).

The current approach could potentially be a return to a more complicated and less accessible set of guidance that could lead to inconsistency and developers and LPAs focusing on some aspects of the guidance rather than viewing it as a whole. We believe a clear, concise single document to be a far better approach to speeding up development including housebuilding, rather than having guidance split across multiple documents.

**4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?** ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. As with all aspects of national guidance, it is important to ensure consistency between LPAs by providing clear guidance. There are currently multiple approaches to traveller sites between LPAs, potentially creating inconsistency in decision making. A standardised approach should ensure consistency and help ensure the housing needs of this group are met.

## **Chapter 1: Introduction**

**5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?** ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree*

**a) Please provide your reasons, particularly if you disagree**

Strongly agree. We welcome the use of the term "substantial" rather than other "levels" of weight as it gives a clear indication regarding the weight to be applied and Government's objective of delivering more sustainable development. We also welcome the reference to the "long-term public interest" and the retention of the definition of sustainable development at paragraph 16. These references help to ensure that the

system serves its purpose, while allowing decisions to be made on balance to take account of local and site specific circumstances.

## Chapter 2: Plan-making policies

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Strongly agree. The approach sets out a clear set of guidance for meeting Government's expectations. We also welcome the fact that the text uses the words "positive" or "positively" throughout this section to ensure spatial development strategies meet their objectives without restraining sustainable development.

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? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) **If not**, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

Strongly Agree. It is important to ensure local plans are responsive and react to local market and other changes. A review every five years should allow for a review of decisions approved under the new plan and the effectiveness of the approach (noting that some of the first planning permissions approved under the new plan would have commenced, and for some small schemes may be delivering housing, within the first five-year period on the basis that they will have been granted with the standard three-year time limit). This therefore allows consideration to be given to stalled sites and the number of homes being delivered as a result of the new local plan. A robust monitoring and review process needs to be developed as part of the local plan to ensure the review is most effective.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need? **Strongly agree**, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Neither agree nor disagree. As set out in our response to question 7, we consider it appropriate for spatial development strategies to be reviewed every five years. If this approach is not taken forward, then we agree the relevant criteria should be update accordingly.

**9) Do you agree with the role, purpose and content of local plans set out in policy PM2?**

**Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. The approach sets out clear guidance for meeting the Government's expectations. We also welcome the fact that the plan should be made on a "positive vision and spatial strategy" to ensure local plans meet their objectives without restraining sustainable development.

**10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No**

**a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.**

We agree that 15 years is appropriate. The approach needs to be consistent for all authorities. The alternative set out on page 20 of the consultation document of "no less than 10 years, with the ability for local planning authorities to go beyond this if they **WANTED**" [emphasis added] would mean local plans could potentially follow different timescales, which is likely to cause greater uncertainty, inconsistency and issues for matters such as cross-boundary developments and cross-boundary issues. While we accept a shorter timeframe would allow the local plan system to be more responsive, there have been significant delays in getting local plans adopted across the country. Additionally, the majority of LPAs are not well-resourced, which is likely to lead to delays and make it difficult to update plans within a shorter timeframe.

**11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the principle of policy PM6(1c) as it avoids repetition between local plans and national policies and increases certainty for all types of developer. This is also in line with the current guidance set at paragraph 16 of the NPPF (December 2024) and that included in the "tests" of soundness at draft Policy PM15. Please also see our response to question 19 below.

**12) Do you agree with the approach to initiating plan-making in PM7? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree**

Strongly agree. We support the principle of policy PM7. It will help to ensure that LPAs work to a set timetable and manage their resources to ensure the timely preparation of a local plan. This is also in line with the current approach to the preparation of a Local Development Scheme.

**13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the principle of policy PM8 as it provides a more prescriptive set of criteria for LPAs to comply with when preparing their evidence base. This approach should help ensure a more robust and consistent set of evidence base documents across all plan areas.

**14) Do you agree with the approach to identifying land for development in PM9?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the principle of policy PM9 as it sets out an approach to ensure consistency across all LPAs. We also particularly welcome the references to Government guidance (footnotes 15, 16 and 17). The footnotes are important for drawing LPAs' attention to relevant guidance, templates and the need for collaborative working between authorities to ensure strategic matters are dealt with. This is important to ensure issues are addressed in full, rather than the current duty to co-operate which does not set any mandatory requirements and has had mixed results across certain LPA areas. It is important to ensure that LPAs co-operate on all matters throughout the plan-making process. Clarification should also be given regarding how co-operation works once the new spatial development strategies are introduced. Please also see our response to question 15 below.

**15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the principle of policies PM10 and PM11 as they set out a more concise approach to collaboration. We also welcome the fact that the requirement to provide for unmet neighbouring need has been retained. Please also see our response to question 14 above.

**16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Neither agree nor disagree. While we support the principle of policy PM12, additional guidance regarding review mechanisms may be beneficial to ensure certainty and consistency across LPAs. Other draft policies have references to Government guidance (such as the footnotes referred in Policy PM9). Consideration should be given to taking the same approach for Policy PM12.

**17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Please see our response to question 16 above.

**18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We support the principle of policy PM13 as it should ensure consistency across local plans (aiding viability) and avoid repetition. This is on the basis that part b. of the policy allows flexibility to allow LPAs to set local standards for some optional aspects of the building regulations, such as accessibility (M4(2) and M4(3) requirements).

**19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?**

Strongly agree. We support the principle of policies PM14 and PM15 as they set out clear tests for local plans, continue the broad aim of current guidance and aim to avoid duplication of national policy. Please also see our response to question 11 above.

**20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?**

We also support the principle of policies PM16 and PM17, although additional guidance is likely to be beneficial. References could be made to relevant Government guidance or the PPG by way of footnotes, as with other draft policies.

### **Chapter 3: Decision-making policies**

**21) Do you agree with the principles set out in policy DM1?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We welcome the approach on the basis that it is more concise and takes a more proportionate approach to the information necessary to support a pre-application enquiry. Consideration should be given to including more prescriptive guidance or criteria regarding the information required at the pre-application stage. This might include, for example, location plans, block plans, other supporting drawings, etc. This approach would provide clarity for developers and avoid inconsistency between LPAs.

**22) Do you agree with the policy DM2 on information requirements for planning applications?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We welcome Policy DM2 as it will help standardise the approach to validation across all LPAs. The policy also allows some flexibility where required and where linked to local policy. We support this element of discretion as it should allow LPAs to take account of local circumstances whilst taking a more focused approach to the information required. At the moment, some LPAs adopt a precautionary approach, requesting various information inapplicable to the development proposal (e.g., through unnecessary proformas, checklists, etc), which causes delay for both developers when preparing applications and the LPA when reviewing the validity of applications.

**23) Do you have any views on whether such a policy could be better implemented through regulations?**

More prescriptive regulations are likely to be beneficial. As mentioned in our response to question 22, many LPAs take a precautionary approach regarding validation which makes it necessary to provide a great deal of information that isn't relevant to the development being proposed. Making the validation requirements more prescriptive by law would increase consistency and speed up preparation and validation of applications by giving LPAs the certainty/reassurance that the level of information being requested is appropriate and sufficient for assessing the application.

**24) Do you agree with the principles set out in DM3?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We welcome the general approach of Policy DM3 as it aims to ensure LPAs take a positive approach to decision-making. The criteria at point d. is particularly important to avoid unnecessary delays in determining applications. However, it may be beneficial to strengthen the wording to ensure LPAs engage with applicants throughout

the process. Applications are often determined without any update or engagement at all from planning officers (despite applicants trying to make contact) even where applicants have first obtained pre-application advice (which could be partly a result of resourcing issues facing LPAs).

**25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?**

*Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Neither agree nor disagree. While we welcome the intention of this policy, it is unlikely to change the current level of negotiations that take place where a viability case is considered. Criteria 6 allows LPAs to apply review mechanisms where contributions are reduced. While this may be appropriate in some circumstances, additional guidance is likely to be beneficial to ensure review mechanisms are not included unnecessarily.

Consideration should also be given to introducing standard wording for review mechanism clauses allowing the review to fall away where a site is acquired and delivered by a housing association at a later stage. This approach would help speed up the delivery of new affordable housing by avoiding the need to submit Deeds of Variation (DoV) to s106 agreements to remove review mechanisms where housing associations re-deliver schemes as 100% affordable (or a proportion above the locally-set affordable housing requirement).

**26) Do you have any further comments on the likely impact of policy DM5: Development viability?**

Please see our response to question 25 above.

**27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?**

**a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.**

We welcome the intentions set out on page 29 of the consultation document regarding amendments to s106 agreements and amendments to planning permissions. We believe the process could be improved by introducing standard templates for both s106 and DoV and standardising the process of submitting a DoV. We've found that some London Boroughs request that a DoV is submitted as a non-material amendment (s96) type application to the planning permission. Other authorities deal with them as a standalone application type with a s106 prefix. Standardising the approach would ensure consistency and certainty for both LPAs and applicants. We believe a separate application type for

DoV rather than a s96 application would be the most appropriate approach as it would ensure that a set record is provided and logged on the site's planning history.

We've also seen LPAs take different approaches to the submission and recording of discharge of planning obligations. In addition, some LPAs do not keep a record of the discharge on their planning register. This can make it difficult to determine whether an obligation has been complied with for all those involved in the development process including the end user. Consideration should therefore be given to standardising the application process. This could be achieved by bringing it in line with the discharge of conditions process with a standard form, fee and process and requiring LPAs to record obligations discharged on their planning register.

**28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing.**

Please see our responses to questions 25, 26 and 27 above.

**a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.**

Please see our responses to questions 25, 26 and 27 above. In addition to the points raised above, consideration could be given to ensuring that the new s73B route does not result in a new planning permission (as per the current s73 application type). If the s73B route is purely an amendment to the original/previous planning permission, it will avoid the automatic need to submit a DoV to transfer the s106 agreement to the new permission. This will allow developers to make changes to permissions without unnecessary delays associated with the DoV process and engaging with solicitors and under-resourced council legal teams.

**29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**Strongly agree.** We welcome the clarification provided by this policy and the references to the national model conditions. This should help ensure a more consistent approach across LPAs.

**30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. While we agree with the approach in principle, we note that criteria 3 encourages the parallel processing of planning and other regulatory consent applications.

Although the intention is noted, some LPAs may use this requirement as a reason to refuse planning permission where applications for consent are not made at the same time. It is possible that some developers are waiting for the certainty that planning permission will be granted before going to the expense of applying for other consents. This could lead to unnecessary refusals. Therefore, we suggest that consideration is given to revising the wording of the criteria.

**31) Do you agree with the new intentional unauthorised development policy in policy DM8?**

*Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Neither agree nor disagree. While we note the intention of this policy, it may be difficult to prove whether a breach is intentional or not. Therefore, there may be a risk that the policy over complicates the enforcement appeal process, with the LPA, applicants and Planning Inspectors getting embroiled in discussions about whether a breach is intentional. This is unlikely to be helpful where a breach is otherwise acceptable in planning terms.

**32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?**

**a) If so, are there any particular additions or mitigations which we should consider?**

Please see our response to question 31 above.

**33) Do you agree with the new Article 4 direction policy in policy DM10? *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

Neither agree nor disagree. We believe the broad approach is acceptable in principle, but suggest that the stronger wording “wholly unacceptable” referred to in paragraph 54 of the current NPPF is retained for change-of-use related applications. The intention of permitted development rights relating to change of use to residential is to increase the supply of housing. Allowing LPAs to further restrict the use of these rights is likely to reduce the number of homes being delivered under permitted development. While permitted development may result in reduced affordable housing and other contributions, the reforms that have taken place in recent years have increased the quality of permitted development schemes and allowed the right to apply only to buildings deemed well-suited to conversion. Given the significant need for new housing, we believe it is appropriate to ensure this continues.

## **Chapter 4: Achieving sustainable development**

**34) Do you agree with the proposed approach to setting a spatial strategy in development plans?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree.

We support the principle of a clear spatial strategy which directs growth towards sustainable locations, particularly brownfield land, town centres and areas well served by public transport and social infrastructure. This approach is consistent with reducing car dependency and supporting compact, walkable neighbourhoods.

However, national policy must ensure that spatial strategies are demonstrably deliverable. Infrastructure capacity – including utilities, schools, healthcare, and transport – must be realistically assessed at plan-making stage. Without alignment between housing targets and infrastructure provision, there is a risk of allocating land that cannot be delivered within plan periods.

Greater clarity on how infrastructure funding and phasing will align with spatial strategies would improve confidence and certainty.

**35) Do you agree with the proposed definition of settlements in the glossary?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree.

A clear definition of settlements is helpful for consistency. However, the definition should avoid overly rigid interpretation that constrains sustainable edge-of-settlement development, rural exception sites, or small infill schemes which can contribute meaningfully to housing supply without undermining spatial objectives.

Additional clarity on what constitutes “adjacent to” or “well-related to” settlements would assist consistent decision-making.

**36) Do you agree with the revised approach to the presumption in favour of sustainable development?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree.

We support maintaining a strong presumption in favour of sustainable development as a means of supporting housing delivery and investment confidence.

However, clarity is needed to ensure that the revised presumption does not inadvertently introduce greater uncertainty into decision-making. Predictability in how decision-makers apply the presumption is essential for programme certainty and investment decisions.

**37) Do you agree to the proposed approach to development within settlements?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree.

Supporting development within settlements promotes efficient land use, sustainable transport patterns and access to services. This approach aligns with good placemaking principles and sustainable design objectives.

**38) Do you agree to the proposed approach to development outside settlements?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree.

While it is appropriate to restrict unsustainable patterns of development, policy should allow sufficient flexibility for:

- Rural exception sites
- Affordable housing-led schemes
- Sensitive infill or rounding-off development.

These can contribute to housing supply and community sustainability without undermining spatial strategy objectives.

**39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons.**

Partly agree. The categories should ensure that affordable housing delivery is not unintentionally constrained. Clear criteria-based assessment would provide flexibility while maintaining control.

**40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) **Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.**

Partly agree.

We support transit-oriented development in principle. Development around well-connected stations can reduce car dependency and support higher densities. However, density expectations must:

- Be context-sensitive
- Reflect heritage and townscape considerations
- Consider local market absorption rates.

National density parameters should allow sufficient flexibility to ensure high-quality placemaking rather than mechanistic application.

- 41) **Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?** *Strongly agree, **partly agree**, neither agree or disagree, partly disagree, strongly disagree.*

- a) **If not, please provide your reasons**

Partly agree.

Requiring neighbourhood plans to include allocations can improve certainty. However, smaller neighbourhood areas may lack technical capacity, and proportionality should be considered.

## Chapter 5: Meeting the challenge of climate change

- 42) **Do you agree with the approach to planning for climate change in policy CC1?** ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) **Please provide your reasons, particularly if you disagree.**

Strongly agree.

Embedding climate change mitigation and adaptation at plan-making stage provides strategic clarity. Stronger alignment between planning policy, Building Regulations and the Future Homes Standard would improve consistency and reduce duplication.

- 43) **Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

- a) **If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?**

Partly agree.

We support stronger weight being given to operational carbon reduction. National policy should encourage whole-life carbon assessment for major schemes, supported by a consistent national methodology to avoid fragmented local requirements.

Without national consistency, developers face a patchwork of local carbon standards, increasing complexity and cost.

**44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?**

Strongly agree.

Adaptation is increasingly critical. Policy should explicitly reference:

- Overheating risk and passive design
- Urban greening and shading
- Water efficiency
- Sustainable drainage systems (SuDS).

Early integration of adaptation measures in masterplanning is essential.

**45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons**

Partly agree.

The policy would benefit from greater clarity on:

- Site layout strategies
- Landscaping buffers
- Material selection.

Guidance should integrate with fire safety policy and Building Regulations to avoid conflicting standards.

**46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?**

- Encouraging embodied carbon assessment
- Supporting retrofit-first approaches

- Promoting grid coordination to unlock electrification

**47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?**

Please see our responses to question 45.

## **Chapter 6: Delivering a sufficient supply of homes**

**48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We welcome the general approach of policies HO1 and HO2. They set out the requirements for assessing housing need and make it clear that specific groups need to be taken into account. This should provide clarification for LPAs and help ensure consistency. Consideration should be given to including young professionals within the list at criteria 2 of draft Policy HO1 as their housing needs may be different to other groups.

We welcome the fact Policy HO2 states that spatial development plan figures should not be tested again at the local plan preparation process. This should ensure greater certainty of delivery at the local level where a spatial development strategy is in place. We note that the policy includes flexibility for LPAs to set the housing requirement where spatial development strategies are not in place. This is welcome and ensures the housing requirement will always be planned for. Shifting the requirement to assess housing need to the spatial development strategy level is also likely to save resources (e.g. one study for multiple LPA areas rather than multiple studies) and ensure the market is more adequately reflected within planning policy/housing need calculations.

We support the approach to neighbourhood plans at criteria 5 of draft Policy HO2 on the basis that it states that LPAs should avoid setting housing requirement figures at nil unless in particular circumstances. However, the wording could be made more robust, for example by replacing “avoid setting” with “not set” in the sentence below “Local planning authorities should avoid setting housing requirement figures for neighbourhood planning areas at nil other than where:”.

**49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) If so, what elements should this guidance cover?**

Partly agree. We believe some additional guidance would be beneficial. For example, Policy HO1.2.f. includes text in brackets which states: “evidence of need for which can be found in the relevant local authority’s Children’s Social Care Sufficiency Strategy”. Having

this type of wording written into national policy helps to ensure certainty for all parties when preparing local plans. Similar guidance could be referred to against other criteria and/or references to relevant Government guidance (such as the PPG) included as footnotes as per other draft policies within the consultation document. The clearer the guidance at the national level, the less discussion and disagreement is likely to take place at the regional/local level.

**50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree in principle. We believe the needs of this group should be assessed in a similar way to other groups.

**51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) If so, what are the key principles this guidance should establish?**

Please see our response to question 49 above. The same principles apply to this question.

**52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We agree with the approach and consider it to be sufficiently clear and less complicated than the current approach set by paragraph 79 of the NPPF. We suggest that consideration is given to amending the wording within paragraph 1 of Annex D (possibly by adding a footnote) to make it clear that the Housing Delivery Test Rule Book is a live/online document and may be updated from time to time. We also understand that the full name of the rule book is the Housing Delivery Test Measurement Rule Book. Updating to this title may avoid any confusion.

**53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We agree with the approach and consider it to be sufficiently clear. However, we note the requirement to monitor supply appears to have been removed. This is currently set out at paragraph 79 of the NPPF. Consideration should be given to reinstating this requirement to make it clear to LPAs that this is necessary and to ensure the latest information is available. This will avoid unnecessary discussion regarding an LPA's housing supply once applications have been submitted.

**54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Strongly agree in principle. We consider it necessary for the needs of this group to be assessed in a similar way to other groups.

**55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Partly disagree. The wording of Policy HO4 does not appear to make it clear whether the onus is on spatial development strategies or local plans to allocate sites. This should be clearly defined to avoid duplication or conflicting approaches when LPAs prepare plans for their area.

**56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree. While we support the approach in principle, we suggest separating the final sentence of draft Policy HO5 1.a.i. into a new bullet point. This would help highlight the importance of meeting the housing needs of rural areas.

**57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, and would you support an alternative minimum percentage requirement?

Partly agree. While we support the need for M4(2) and M4(3) compliance, it is not clear what evidence the 40% requirement set by draft Policy HO5 is based on. Further clarification should be provided. We otherwise agree that the requirement should be based on evidence at the local level.

**59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the approach in principle on the basis that draft Policy HO5 1.a.c. makes reference to “where there is an identified need”. Where need can be demonstrated, it seems appropriate to allocate sites to meet that need.

**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?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?**

Partly agree. We welcome the approach in principle on the basis it should allow greater flexibility for small and medium size developers on schemes of less than 150 units. However, it is unclear what evidence the 150-unit threshold is based on. This should be fully justified as a different figure may be more appropriate.

**61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons**

Partly agree. While we support the need for a diverse range of sites to assist small and medium size developers, it is not clear what evidence the 10% requirement or the site size thresholds are based on. This should be fully justified as a different approach may be more justified and further assist small and medium size developers.

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

We support the general approach and the reference to substantial weight. However, consideration should be given to either defining within policy or providing guidance regarding what may constitute “other relevant evidence”. Additional guidance may help remove uncertainty, particularly as earlier draft policies have already set a need to cater for multiple groups as part of the plan-making process.

**63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes?** **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Strongly agree. We agree with the need to provide military affordable homes. Additional guidance on how this should be achieved will be necessary. Therefore, we welcome the Government's intention on page 45 to provide further guidance regarding the matter.

**64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?** **Strongly agree**, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Partly agree. We support the approach in principle as it is likely to assist some developers and help increase the delivery of new housing. However, the policy wording may make it difficult for housing associations to acquire sites and deliver additional affordable housing. This is because some housing associations need to amend the mix of units to ensure scheme viability.

For example, there may be circumstances where a block is better suited to a particular user group and where, for management reasons, it is necessary to group certain size units or tenures within one part of the site. Local affordable housing need must also be taken into consideration. Where there is a need for family-size affordable units, it may be necessary to reduce the number of one-beds and increase the number of two- or three-bed units in order to meet demand. Rental incomes from social rented units may also make it necessary to provide other tenures and/or sizes of units in order to make a scheme viable whilst maximising the level of social rented units that can be delivered.

**65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?** **Strongly agree**, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

a) **If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?**

Partly agree. While setting a requirement is a good approach in principle, as per our response to question 64, some flexibility for housing associations is required in order to maximise delivery. Housing associations have different funding streams, management structures, tenant needs, etc to private landlords. They are well placed to deliver more housing, but require the flexibility to do so to meet their funding models and obligations as housing providers.

**66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?**

**a) If so, what changes would be beneficial?**

We agree, in principle, that temporary accommodation should be supported through the planning system. There are potentially multiple situations where temporary accommodation is required. Consideration should therefore be given to support for temporary accommodation where there is an identified need.

**67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?**  
*Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.**

Partly agree. While the starting point for all schemes should be on-site provision, we acknowledge there may be times when small and medium size developers prefer to make cash payments. Housing associations are also unlikely to be in a position to acquire a small number of s106 units (depending on type, size, tenure of units and strategic priorities for the locality). On the basis that medium size schemes are those of between 10-49 units (see also our response to questions 213 to 216), allowing this level of flexibility is likely to encourage more small and medium size developers to deliver more housing.

**b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer**

We agree with this approach in principle.

**68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).**

Please our response to question 67.

**69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.**

Consideration should be given to encouraging LPAs to partner with housing associations to deliver affordable housing and/or make funding available to housing associations to deliver new affordable housing. This would encourage the delivery of more housing and 100% affordable schemes.

**70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?**

- a) **If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.**

We agree that further guidance would be beneficial to ensure consistency and certainty for all those involved in the delivery of new market and affordable housing. While the suggestion above relating to Gross Development Value may be appropriate, any guidance should be based on robust evidence and strike a balance between viability and certainty of delivery. It may be that a value below Gross Domestic Value is appropriate if it helps deliver more market housing, whilst still allowing LPAs to benefit from contributions towards affordable housing elsewhere within the plan area.

**71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) **Please provide your reasons, particularly if you disagree.**

We support this in principle. As per our response to question 69 above, it may be that more housing is delivered by taking a more flexible approach. This is particularly likely in the case of large-scale developers who may have larger areas of land under option agreements and/or multiple sites within close proximity to one another. Such an approach is likely to speed up delivery whilst helping housebuilders (of all sizes) and housing associations manage funding and cash flow more effectively.

**72) Do you agree with the criteria set out regarding the locations of specialist housing for older people?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) **Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the locational criteria in principle on the basis that these groups are less likely to own private cars and therefore need to be located near to shops, services and public transport interchanges.

**73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the locational criteria in principle on the basis that these groups are less likely to own private cars and therefore need to be located near to shops, services, employment opportunities and public transport interchanges.

**74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We support the locational criteria in principle on the basis that these groups are less likely to own private cars and therefore need to be located near to shops, services, employment opportunities and public transport interchanges.

The definition of large-scale shared living accommodation states that “This type of accommodation does not constitute self-contained dwellings (use class C3), HMOs, student accommodation, hotels, or other residential institutions. Tenancies should be for a minimum of 3 months.” It is unclear what type of accommodation would be covered by the three-month tenancy period. Depending on what this covers, it may not be appropriate to include it within the same policy as the other types of specialist accommodation. Therefore, we believe further clarification regarding this type of accommodation is necessary.

**75) Do you agree the proposals provide adequate additional support for rural exception sites?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, including what other changes may be needed to increase their uptake?**

Strongly agree. We support the approach to rural exception sites and the removal of First Homes exception sites. The approach should help deliver more affordable housing where it is needed.

**76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Please see our response to question 75 above.

**77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?**

No comment.

**78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**79) Please provide your reasons, particularly if you disagree.**

No comment.

**80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Neither agree nor disagree. While some large-scale developers may be better placed to accommodate this requirement, we believe it may be an unnecessary requirement given the large number of variables that can cause fluctuations in a scheme's build out-rate. Recent economic conditions (including rising build costs, labour costs, material costs and high borrowing costs) together with legislative changes outside of planning (e.g. building regulations, building safety, etc) have had a significant impact on the delivery of housing. Imposing a requirement to meet a certain build-out rate could therefore be considered somewhat unreasonable. The intention to introduce this requirement is also at odds with the flexibility being proposed by criteria 3 of draft Policy HO13. Please also see our response to question 81 below.

**81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We support flexibility for large-scale and mixed-use developments, providing that the broad parameters of development are secured as part of the planning permission for the site. Further guidance will be necessary to make it clear what the Government expects LPAs to approve as a minimum to strike a balance between flexibility and

certainty of the type of development. This flexibility is also at odds with the build-out condition proposed by criteria 2 of draft Policy HO13. Please also see our response to question 80 above.

**82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? Yes, no**

**a) Please provide your reasons.**

Yes, additional guidance is likely to be beneficial. For example, setting a requirement for LPAs to prepare masterplans for new very large major development. While this is the usual approach, specific guidance on the scope of masterplans and their status (e.g., whether adopted as a supplementary planning document) would be beneficial.

**83) Do you agree with the proposed changes to the Housing Delivery Test rule book?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We support the proposed changes in principle. Please also see our response to question 52 above.

## **Chapter 7: Building a strong, effective economy**

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

**84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

**85) Do you agree with the approach to meeting the need for business land and premises in policy E2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

**86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

**87) Do you agree with the approach to rural business development in policy E4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

## Chapter 8: Ensuring the vitality of town centres

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

- 88) Do you agree with the proposed changes to policy for planning for town centres?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 89) Do you agree with the approach to development in town centres in policy TC2?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) If not, please explain how you would achieve this aim differently?
- 90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?**
- 91) Do you believe the sequential test in policy TC3 should be retained?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 92) Do you agree with the approach to town centre impact assessments in policy TC4?**  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.

## Chapter 9: Supporting high quality communications

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

- 93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.

## Chapter 10: Securing Clean Energy and Water

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

Strongly agree.

Energy and water infrastructure are major constraints on housing delivery. Strengthening policy support for grid upgrades and water infrastructure is essential. Coordination between planning authorities, utility providers and infrastructure regulators should be improved to reduce delays.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Strongly agree.

Supporting renewable and low-carbon energy development is critical to net-zero objectives and housing decarbonisation. Greater clarity on how local authorities should balance visual impacts with national energy security objectives would improve consistency.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

Strongly agree.

Clear support for renewable infrastructure will reduce planning risk and provide certainty for investment.

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

**a) Please provide your reasons, particularly if you disagree.**

Partly agree.

Water neutrality and nutrient neutrality requirements have significantly constrained delivery in some regions. National policy should provide:

- Clear mitigation pathways
- Defined responsibilities
- Proportionate burden-sharing mechanisms

This would improve certainty and unlock stalled sites.

## **Chapter 11: Facilitating the sustainable use of minerals**

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

**100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

**101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

**102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

**103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

**104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

- 105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- 106) Please provide your reasons, particularly if you disagree.
- 107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- 108) Please provide your reasons, particularly if you disagree.
- 109) Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No
- 111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.
- 112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.

## Chapter 12: Making effective use of land

- 114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- 115) If not, what further guidance is needed?

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**116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. While we agree with the aims and general approach of the draft policy, consideration should be given to ensuring design codes (criteria 1.ii.) are positively prepared to maximise rather than curtail new development. Where the design code covers a range of matters, it may be that LPAs use them as a way to prescribe the form of development rather than release an area's potential for growth and innovative design. Consideration should therefore be given to amending the wording or providing references to additional guidance making it necessary for design codes to specifically set out the opportunities for making effective use of land within the area.

**117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?** *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) If not, what typologies should be added or removed and why?**

Partly agree. We support the aims and intentions of this policy in principle. We note that criterion 1.b. makes specific reference to "redeveloping under-utilised retail sites". While we believe this is beneficial, as retail now falls within Class E it may be beneficial to re-word this criterion. Noting the need to protect business premises, consideration could be given to amending this to state "redeveloping under-utilised retail sites and redeveloping other class E sites with mixed use schemes". This would allow redevelopment of genuinely underused sites while allowing flexibility to provide new mixed-use developments where a business use would well serve the locality.

**118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?** ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We welcome the approach and flexibility provided by this policy (for example, the references to larger buildings at L2(d).i). We also support the references to accessibility and the need to ensure adequate daylight etc at L2(d).ii. We also support footnote 43 as it helps modernise the definition of existing building rather than referring to the 1948 date referred to in planning legislation. Consideration should be given to applying this definition to other aspects of national policy to assist further with the delivery of new development and ensure there are more opportunities to make efficient use of land.

**119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot**

**redevelopment and upwards extensions.** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) **Please provide your reasons, particularly if you disagree.**

Please see our response to question 118 above.

**120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) **Please provide your reasons, particularly if you disagree.**

Please see our response to question 118 above.

**121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) **If not, please explain how guidance could be clearer?**

Partly agree. We support the approach to the policy in principle as the guidance is clear. We particularly welcome the guidance referred to at footnotes 44 and 45 as this helps to provide a clear definition. However, there is a degree of conflict between L3.2. and L3.3. Consideration should be given to making it clear that greater flexibility is acceptable for sites within close proximity to stations to provide clarity and avoid unnecessary discussion at the application stage.

**122) Do you agree with the minimum density requirements set out within policy L3?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) **Please provide your reasons, particularly if you disagree.**

Please see our response to question 121 above.

b) **Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence**

It is noted that the housing characteristics of these groups vary from conventional general needs housing. This could be adequately covered by including a footnote excluding this type of housing from increased density requirements and instead requiring it to conform with other policies and guidance relating to character and appearance.

**123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the principle of using dwellings per hectare (dpa) as a starting point and the definition of net developable area. This would provide a clear way to establish density while also enabling site constraints to be considered. This approach is useful in situations where sites are constrained by particular features such as water courses and/or changes in levels. One example is that of a site on the edge of Cranleigh, Surrey where a site included a change in levels sloping downwards towards a water course. The southern edge of the site was therefore within a flood zone while the rest of the site was Flood Zone 1. This therefore set a natural developable area and helped set an appropriate density for the site.

**124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons and preferred alternatives.**

Please see our response to question 121 above.

**125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally?** *Yes/No*

**a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?**

We agree that consideration should be given to setting higher densities for urban cores and town/city centres. Whilst PTAL could be used within Greater London, outside of London consideration should be given to LPAs designating city/town centre boundaries and/or utilising the Connectivity Tool referred to at draft Policy TR3. This approach would allow increased densities in appropriate locations whilst taking account of an area’s particular characteristics. Please also see our response to question 152 below.

**126) Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?**

While we consider the references to 40dpa and 50dpa to be appropriate, consideration should be given to making it clear that these are a minimum rather than a ceiling. The current draft text at L3.3. refers to “at least” - consideration should be given to amending this to “minimum” to ensure densities are increased in these locations.

**127) If so, what should that range be, and which locations should it apply to?**

Please see the response to question 126 above.

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

129) Please provide your reasons, particularly if you disagree.

No comment.

### Chapter 13: Protecting Green Belt land

130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

131) Please provide your reasons, particularly if you disagree.

Strongly agree. We consider the approach to be appropriate on the basis that it allows LPAs to reconsider green belt boundaries where necessary.

132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Partly agree. While we support the approach of the policy, it is somewhat unclear whether green belt reviews will be undertaken solely at the spatial development strategy level or at both the spatial development strategy level and the local plan level. The wording should also be revised to make it clear whether LPAs need to undertake a review in the absence of a spatial development strategy level review.

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Strongly agree. The approach should allow development to take place in areas well-served by public transport, rather than directing development to other locations on the edge of settlements that may not always be as well-connected. This approach is also likely to allow some growth in these locations, which would avoid the stagnation of smaller settlements around stations by bringing new life into these areas and support for local shops and services.

**134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**135) Please provide your reasons, particularly if you disagree.**

Partly agree. While we support the broad aims in principle, not all green belt land will achieve these requirements, but may still comply with the green belt objectives set by draft Policy GB2. Therefore, it may be beneficial to make it clear that these requirements only apply when considering new developments or amendments to the green belt boundary. Other statutory bodies are likely to be better placed to determine the role of the green belt with regard to these matters than LPAs. Consideration should therefore be given to making it clear that the relevant statutory bodies need to be consulted regarding these matters.

**136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the principle of these policies and welcome the reference to affordable housing.

**137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.**

Partly agree. We support this policy in principle. Consideration should be given to amending the wording to state that all of the criteria (h.i.-v.) need to be satisfied (where relevant). The term “physically well-related” may also need to be clarified to avoid unnecessary discussion at the application stage. A set radius or criterion may be appropriate.

**139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. While we support the Government’s brownfield development first approach, there will be times when it is appropriate to build on lower quality green belt areas (such as the grey belt and sites that meet the Golden Rules). Where this is appropriate, we support the principle of a viability assessment. We also suggest that consideration is given

to referencing contaminated land or sites where invasive species are present. This will allow greater flexibility on sites where significant mitigation or remediation are required, while also allowing environmental improvements associated with clearing or removing the contamination/invasive species.

- 140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?**

We do not consider any policy changes to be necessary on the basis that the definition of previously developed land in the glossary is clear and the criteria at draft Policy GB83.a. makes specific reference to previously developed land.

- 141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?**  
*Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

- 142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?**

Neither agree nor disagree. While this approach may have merit, it is somewhat at odds to other sections of the draft NPPF which aim to encourage development by small and medium size developers.

If a floor is to be introduced, we believe a blanket approach such as that set out at option a) would be appropriate to provide maximum certainty for all parties.

- 143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?** *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

- a) Please explain your answer.**

Neither agree nor disagree. The 10 times Existing Use Value appears to be somewhat arbitrary. Such an approach should be based on robust evidence and fully justified.

- 144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?**

No comment.

- 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 agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) **Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the change on the basis that it provides a far clearer and less restricted definition than that which exists in the current NPPF. It may be that green belt areas covered by the footnote 7 designations are appropriate for development. As these areas are afforded protection by other sections of the draft NPPF, it is appropriate to remove reference to them from the Grey Belt definition.

## Chapter 14: Achieving well-designed places

146) **Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?** **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) **Please provide your reasons, particularly if you disagree.**

Strongly agree.

High-quality design should be embedded in development plans. However, design requirements must remain proportionate and viable. Design codes are beneficial when:

- Prepared collaboratively
- Proportionate
- Flexible enough to allow innovation.

The Office for Place have prepared a Design Code Library which provides a selection of good quality design codes from across the country. Both Policy DP1 and DP2 could make reference to the Design Code Library and the National Model Design Code to assist LPAs in preparing suitable codes for their area. Please see also our response to Question 147 below.

147) **Do you agree with the approach to design tools set out in policy DP2?** *Strongly agree*, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

a) **Please provide your reasons, particularly if you disagree.**

Partly agree.

Design tools such as codes and guides are useful. However:

- Local authorities require adequate resources
- Overly prescriptive codes risk stifling innovation
- Duplication between design review and committee processes should be avoided.

Please see also our response to Question 146 above.

148) **Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?** **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Strongly agree.

Development should respond positively to context. However, this should not be interpreted as requiring replication of existing poor-quality urban form. Policy should explicitly support contemporary architecture and contextually-justified density uplift.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, what else would help secure better design and placemaking outcomes?

Partly agree.

Design review adds value when:

- Undertaken early
- Independent
- Proportionate to scheme scale

Mandatory review for all major schemes may introduce delay and cost. A risk-based approach would be more appropriate.

## Chapter 15: Promoting sustainable transport

150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No comment.

151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Partly agree. We support the policy in principle. Consideration should be given to referencing market conditions and the types of units being proposed. For example, homes aimed at those wishing to downsize may not require the same level of parking and the presence of parking control schemes (such as Controlled Parking Zones).

**152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We support the policy in principle and the use of the connectivity tool. The current wording refers to schemes which “can be made sustainable”. The timing of any improvements in relation to the delivery of development needs to be carefully considered. Some supporting guidance regarding this and how timing in relation to phasing is secured by conditions or s106 may be beneficial. We welcome the proposed use of the connectivity tool particularly for schemes outside of London as it should help provide evidence that justifies a scheme and/or the approach being taken to transport. Please also see our response to question 125 above.

**153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We welcome the approach and the reference to government guidance at footnote 56. We consider the criteria to be appropriate and the government guidance gives a clear starting point when considering transport related matters. Consideration could be given to setting a definition of reasonable walking and cycling distance such as that set out in the now withdrawn guidance prepared by the Department for Transport’s (DfT) Local Transport Note (LTN) 1/04 ‘Policy, Planning and Design for Walking and Cycling’ (2004). This level of guidance would help remove uncertainty and avoid unnecessary discussion at the application stage.

**154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

No comment.

**155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. While we support the approach in principle, consideration should be given to setting the thresholds for providing statements and travel plans etc. For example, it

may not be necessary to provide a statement for small schemes (e.g., up to 10 units) where they meet the local parking, cycling and refuse requirements.

**156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

No comment.

**157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support the proposal on the basis that it allows existing rights of way to be taken into account. Existing routes can help connect a development and there may be circumstances where these can be improved to make a development acceptable in transport terms.

## Chapter 16: Promoting healthy communities

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

**158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

**159) Do you agree that Local Green Space should be 'close' to the community it serves?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

**160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

- 161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?

- 162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

- 163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

- 164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

## Chapter 17: Pollution, Public Protection and Security

- 165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? **Strongly agree**, *partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

Strongly agree.

Early identification of contamination and environmental constraints reduces abortive design work and improves deliverability.

**166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?**

Clearer national guidance on remediation standards and cost expectations would improve viability transparency and unlock brownfield land.

**167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

**168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Strongly agree.

This principle is critical to supporting urban intensification and mixed-use regeneration.

**169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Partly agree.

Security considerations are important but must be balanced with high-quality public realm and placemaking objectives.

**170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Strongly agree.

Providing clarity on weight supports national resilience objectives.

## **Chapter 18: Managing Flood Risk and Coastal Change**

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

**171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**173) Do you agree with the proposed approach to the exception test set out in policy F6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree**

**174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?**

**178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.**

## **Chapter 19: Conserving and enhancing the natural environment**

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

**179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?**

**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? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, including how policy can be improved to ensure compliance.**

**183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

**184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?**

## **Chapter 20: Conserving and enhancing the historic environment**

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons.

186) Do you have any evidence as to the impact of implementing the additional regard duties for development?

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

191) Do you have any other comments on the revisions to the heritage chapter?

### Further questions: Transitional arrangements

192) Do you agree with the transitional arrangements approach to decision-making? **Strongly agree**, *partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Strongly agree. The transitional arrangements are clear for all parties and ensure that consistency should be achieved (where possible) across new local plans from the date of publication.
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193) Do you have any further thoughts on the policies outlined in this consultation?

No comment.

### Further questions: Written Ministerial Statements and other documents

194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Strongly agree. We support that intention to replace these documents. Having as much guidance consolidated in one document as possible helps to ensure that it remains accessible to all those involved in the planning process.

### Annex A - Data Centres and onsite energy generation

NO RESPONSES TO QUESTIONS IN THIS CHAPTER

195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please give reasons.

196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? *Yes/No*

a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.

198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? *Yes/No*

a) Please provide your reasons.

- 199) What benefits or risks do you foresee from making this change? Please provide your reasons.

## Annex B - Viability: Standardised inputs in viability assessment

NO RESPONSES TO QUESTIONS IN THIS CHAPTER
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- 200) Would you support the use of growth testing for strategic, multi-phase schemes?  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer

- 201) Would you support the optional use of growth testing for regeneration schemes?  
*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer

- 202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer. **If you agree**, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.

- 203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

- 204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

a) Please explain your answer.

- 205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

- 206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise

**compliance with plan policy?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer.

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

a) Please explain your answer.

208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) In what circumstances might a premium, or the usual premium, not be required?

b) What impact (if any) would you foresee if this change were made?

209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer.

210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion / Another metric / Neither*

a) **if another metric**, please set out your preferred approach and rationale.

211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer.

### [Annex C - Reforming Site Thresholds](#)

213) Do you agree that a 2.5 hectare threshold is appropriate? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Partly agree. We consider it necessary for the site thresholds to be based on area only. The proposed system combines home and hectare thresholds. This could unintentionally discourage developers from bringing forward denser-than-normal schemes on very small, small, or medium-sized sites. For instance, a development featuring 50 homes on a 0.9ha site would be considered as a major development with all the additional planning requirements that entails. This could inadvertently undermine Government's brownfield first ambitions given brownfield land tends to be built out at a higher density. A purely area-based size threshold would allow developers to better adapt density to context and provide a higher degree of certainty about expected planning requirements.

**214) Do you agree that a unit threshold of between 10 and 49 units is appropriate?**

*Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

**a) Please provide your reasons, particularly if you disagree.**

Please see our response to question 213 above.

**215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? Yes/No.**

**216) If so, please explain your answer and provide views on potential mitigations.**

Please see our response to question 213 above.

### Implementation of new medium category outside the Framework

**217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?**

**a) Please provide your reasons.**

We support the exemption being expanded in principle. However, without the results of the recent consultation, it is difficult to assess what impact this will have or whether it is supported by consultees. The approach, thresholds and types of development covered by the exemption need to be based on robust evidence.

**218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?**

**a) Please provide your reasons.**

Please see our response to question 217 above.

**219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.**

Please see our response to question 217 above.

**220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.**

Please see our response to question 217 above.

**221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.**

Please see our response to question 217 above.

### **Uplifting the Permission in Principle threshold**

**222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

**a) Please provide your reasons, particularly if you disagree.**

Strongly agree. We support this in principle on the basis that it should allow small and medium size developers the ability to gain certainty regarding a site's potential for little upfront cost. Expanding this to larger schemes is therefore likely to see more homes delivered in line with the Government's objectives.

**223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?**

We support the need for a planning statement to be submitted with a permission in principle application. This approach should allow developers to justify their proposal and increase the chance of obtaining consent. However, it is important that LPAs do not see this as an opportunity to introduce local validation requirements for PIP applications. The requirement should therefore be set nationally only.

## **Public Sector Equality Duty**

NO RESPONSES TO QUESTIONS IN THIS CHAPTER
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- 224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?**
- a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.**
- 225) Is there anything that could be done to mitigate any impact identified?**