

# Consultation response form

**This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (\*)**

## Your details

First name*	Click here to enter text.
Family name (surname)*	Click here to enter text.
Title	Click here to enter text.
Address	Click here to enter text.
City/Town*	Click here to enter text.
Postal code*	Click here to enter text.
Telephone Number	Click here to enter text.
Email Address*	Click here to enter text.

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\*

## Please select an item from this drop down menu

If you are responding on behalf of an organisation, please select the option which best describes your organisation. \*

## Local authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)

If you selected other, please state the type of organisation

Please provide the name of the organisation (if applicable)

## Chapter 1: Introduction

### Question 1

Do you have any comments on the text of Chapter 1?

No

## Chapter 2: Achieving sustainable development

### Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

Yes

Please enter your comments here

Simplifying the approach to calculating local housing need is welcomed. Current methods to calculate objectively assessed housing need is complex and is often disputed through the examination stages incurring avoidable costs.

The requirement to accommodate OAHN by neighbouring authorities unless there are strong reasons not to is supported.

### Question 3

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

Yes

Please enter your comments here

[Click here to enter text.](#)

### Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

[Click here to enter text.](#)

## Chapter 3: Plan-making

### Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

**Yes**

Please enter your comments here

The application of the tests of soundness reflecting reasonable alternatives and proportionate evidence is supported.

### **Question 6**

Do you have any other comments on the text of chapter 3?

Click here to enter text.

## **Chapter 4: Decision-making**

### **Question 7**

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

**Not sure**

Please enter your comments here

There would be support to increase levels of transparency however, this should be at a level that allows scrutiny and accountability. Further guidance will be needed to ensure that the processes are clear.

### **Question 8**

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

**No**

Please enter your comments here:

Local Planning Authorities are able to determine circumstances where viability assessments may be required and this discretion should remain.

### **Question 9**

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

In principle, a mechanism to capture uplift in values would be supported. However, it is assumed that values could also decrease if costs rise. Introducing further review mechanisms may affect planning contribution agreements which have already been agreed.

### Question 10

Do you have any comments on the text of Chapter 4?

No

## Chapter 5: Delivering a wide choice of high quality homes

### Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

The term suitable proportion will vary between authorities. In areas where there are large sites providing the majority of housing units, this may be to the detriment of smaller and medium sized sites coming forward. The increasing pressure to deliver housing in large numbers will inevitably concentrate resources to schemes and areas that deliver the highest return. An added burden to secure other sites will stretch resources. The suitability, sustainability and deliverability of sites should inform the programme of sites coming forward rather than an arbitrary indicator where local circumstances are not taken into account.

### Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

No

Please enter your comments here

Where Local Planning Authorities have made adequate provision of housing sites and provided a justified and realistic trajectory for delivery why should it follow that the LPA would be penalised? Surely the issue here would fall to developers not bringing forward sites and achieving the build out rates that have been allocated or permitted. There is a need to ensure that an open dialogue takes place between parties to support monitoring activities as well as measures to ensure developers build out at a faster rate where targets are not being achieved and where they have failed to provide accurate information.

### Question 13

Do you agree with the new policy on exception sites for entry-level homes?

No

Please enter your comments here

Click here to enter text.

### Question 14

Do you have any other comments on the text of Chapter 5?

Changes to affordable housing definitions introduces a greater element of subsidised home ownership products. This will reduce the delivery of affordable homes and Section 106 contributions.

## Chapter 6: Building a strong, competitive economy

### Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

### Question 16

Do you have any other comments on the text of chapter 6?

No

## Chapter 7: Ensuring the vitality of town centres

### Question 17

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

Yes

Please enter your comments here

Renewed importance given to the sequential test is supported.

### Question 18

Do you have any other comments on the text of Chapter 7?

[Click here to enter text.](#)

## Chapter 8: Promoting healthy and safe communities

### Question 19

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

No

### Question 20

Do you have any other comments on the text of Chapter 8?

No

## Chapter 9: Promoting sustainable transport

### Question 21

Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

**Please select an item from this drop down menu**

Please enter your comments here

The approach is generally acceptable however paragraph 109 recommends refusal of development proposals if the residual impacts on the road network or road safety are severe, The term severe is not defined and therefore cannot be measured and will inevitably lead to costly and time consuming disputes.

### Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 23

Do you have any other comments on the text of Chapter 9?

No

## Chapter 10: Supporting high quality communications

### Question 24

Do you have any comments on the text of Chapter 10?

No

## Chapter 11: Making effective use of land

### Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

**Yes**

Please enter your comments here

A universal minimum density would not be appropriate but these should be set on a site by site basis based on the characteristics of the site and the local context.

### Question 27

Do you have any other comments on the text of Chapter 11?

No

## Chapter 12 : Achieving well-designed places

### Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

No further comments

### Question 29

Do you have any other comments on the text of Chapter 12?

No

## Chapter 13: Protecting the Green Belt

### Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are 'not inappropriate' in the Green Belt?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

### Question 31

Do you have any other comments on the text of Chapter 13?

Click here to enter text.

## Chapter 14: Meeting the challenge of climate change, flooding and coastal change

### Question 32

Do you have any comments on the text of Chapter 14?

Click here to enter text.

### Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

**Please select an item from this drop down menu**



[Click here to enter text.](#)

## Chapter 15: Conserving and enhancing the natural environment

### Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

**Yes**

Please enter your comments here

[Click here to enter text.](#)

### Question 35

Do you have any other comments on the text of Chapter 15?

No

## Chapter 16: Conserving and enhancing the historic environment

### Question 36

Do you have any comments on the text of Chapter 16?

No

## Chapter 17: Facilitating the sustainable use of minerals

### Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

No

### Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

### **Question 39**

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

## **Transitional arrangements and consequential changes**

### **Question 40**

Do you agree with the proposed transitional arrangements?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

### **Question 41**

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

### **Question 42**

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

## Glossary

### Question 43

Do you have any comments on the glossary?

[Click here to enter text.](#)

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