

National Planning Policy Framework

Consultation questions

We are seeking your views on the following questions on the Government's proposal for a new National Planning Policy Framework.¹

Email responses to: planningframework@communities.gsi.gov.uk

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

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(a) About you

(i) Your details

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(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response

Personal views

¹ (see: <http://www.communities.gov.uk/publications/planningandbuilding/draftframeworkconsultation>)

(iii) Are your views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group.

Yes

No

Name of group:

(iv) Please tick the *one* box which best describes you or your organisation:

Private developer or house builder

Housing association or RSL

Land owner

Voluntary sector or charitable organisation

Business, consultant, professional advisor

National representative body

Professional body

Parish council

Local government (i.e. district, borough, county, unitary,etc.)

Other public body (please state)

Other (please state)

(v) Would you be happy for us to contact you again in relation to this consultation?

Yes

No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

(b) Consultation questions

Delivering Sustainable Development

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

1(a) – Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

1(b) Do you have comments? (please begin with relevant paragraph number)

The Council supports the principle of simplifying the planning system.

Paragraphs 9 and 10 - The Council welcomes the commitment to Sustainable Development however these paragraphs together provide a limited definition of the elements of sustainable development. It should be made clear that to define sustainable development appropriately that it should be set out in local plans, as every area is different.

Paragraph 11 - The Council supports the Government's intention to pursue sustainable development in an integrated way.

Paragraph 13 - The Council notes that planning has a key role in encouraging economic growth. However the core of the planning system is now being focussed towards economic growth. It is important to ensure that the balance is properly maintained and that the different strands of sustainable development – economic, social and environmental – are considered as equal and complementary to one another.

Paragraph 14 - The Council has concerns that the general presumption in favour of development 'wherever possible' could undermine plan preparation, particularly where the NPPF indicate that permission is to be granted where plans are absent. Local authorities have reached varying stages in the preparation of their Local Development Frameworks. Sufficient time needs to be provided to enable local authorities to catch up, working with stakeholders and communities to put in place plans which are appropriate and reflect the circumstances of their local area. A transitional period is required, perhaps 12 months from the date of approval of the NPPF to allow local plans to advance to adoption.

Paragraph 17 & 18 - The Council welcomes the concept of neighbourhood plans. The organisational structures required to effect

neighbourhood planning are not clear, particularly in terms of achieving appropriate levels of participation and involvement etc.

Paragraph 19 bullet point 2 – The default answer of ‘yes’ to development proposals is a concern. This does not take account of local circumstances and issues which Local Authorities need to address. This approach does not appropriately balance growth against social issues and environmental capacity.

Plan-making

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

2(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

2(b) Do you have comments? (please begin with relevant paragraph number)

The emphasis on a plan-led system is supported, as is the requirement for strategic priorities to be set by local authorities working in partnership.

Paragraph 20 - The council has concern over the lack of clarity in relation to “adverse impacts”, it is considered that more guidance is needed as to what constitutes an adverse impact and how these will be assessed.

Paragraph 21- The Council considers that SPDs will continue to be an important mechanism in delivering well planned, sustainable development, particularly in the form of Masterplans and Area Action Plans, which can support the more streamlined approach to national policy within the NPPF

Paragraph 27- The Council welcomes the emphasis on the evidence base being proportionate.

Paragraphs 40 & 43 – the Council supports the need to ensure that development proposals are viable and deliverable and welcomes a sensible approach to ensure obligations and policy do not threaten viability. Viability and deliverability are important elements of plan making, but can vary over the short, medium and long term and can be influenced by other factors beyond planning. e.g. housing, reces-

sion

Reference to the Community Infrastructure Levy is supported, which will help to ensure that infrastructure required during the plan period is delivered. However to undertake infrastructure planning (requirements, timescales, costs and setting CIL rate) as part of the production of the Local Plan may be difficult when preparing a 15 year plan. e.g. development costs will change over this timescale. There should be some consideration that acknowledges the difficulties in assessing infrastructure requirements over time and a more flexible approach be adopted taking into account of changing economic cycle.

The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

2(c) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

2(d) Do you have comments? (please begin with relevant paragraph number)

The Council welcomes the support for collaborative working between Borough/District and County Councils and with neighbouring authorities as well as with the Local Enterprise Partnerships. Further clarification is sought as to the extent of bodies which are covered under the Duty to Cooperate and a full list of these should be set out within the NPPF.

Paragraph 45 - The Council welcomes the requirement for Local Authorities to work collaboratively to ensure that strategic priorities across boundaries are properly coordinated and reflected in Local Plans;. It is presumed from the limited detail that it will be for Local Authorities to establish ways of joint working.

Paragraph 46 & 47 - The Council feels that it may also be difficult for some Local Authorities to demonstrate evidence of having successfully cooperated. Local Authorities are at varying stages in preparing their development plans and as such it may be difficult to properly coordinate joint working. It may also be the case that neighbouring authorities have competing priorities, which cannot be negotiated. Further guidance on how to undertake joint working when neighbour-

ing Local Authorities are at different stages (particularly where there are authorities where a plan is already adopted) would be helpful.

The Council also considers that the objectives, policies and principles within the Framework have not yet been set out clearly enough to guide collaboration.

Paragraph 48 - the reference to unmet needs in neighbouring authorities requires further clarification. e.g., what circumstances would it be appropriate for a Local Authority to have 'unmet demand'. Many authorities have more than one immediately adjoining neighbour and without the RSS being in place clarification is required on who determines which neighbouring authority(s) should meet the unmet requirements. The Council would argue for this decision to remain locally determined with more emphasis made on planning for prosperity, people and places (as per the introduction to the NPPF) in determining how unmet requirements within Local Authorities would need to be met across boundaries. It cannot be socially or economically sustainable for significant unmet demand to be constrained just because an adjoining authority decides that it isn't for them to assist.

The Framework could potentially reduce the ability of local authorities to secure necessary gains to mitigate development impacts. Authorities must retain sufficient powers to secure benefits from new developments to ensure their long-term success and sustainability and make them acceptable to local people. This can only be achieved if Local Plans are in place with **genuine** joint working on infrastructure and CIL in place before large greenfield planning applications are approved.

Previously local authorities had to show that sites were deliverable. It is not clear that local authorities are best placed to judge "viability" of commercial sites.

Further consideration needs to be given to how authorities work together to consider infrastructure requirements related to developments, to ensure that there is sufficient funding to deliver the related infrastructure and that we make best use of existing infrastructure. Counties and Upper tier authorities have a key role to play in supporting planning for infrastructure, and there needs to be closer working on viability issues to ensure that new provisions in the draft NPPF don't limit the ability to secure funding for key infrastructure.

Paragraph 48 - The Council notes the additional test of soundness, however it is not clear how this will be tested at Examination in Public. Further clarification on this issue is requested. It would be useful for the Soundness Self-Assessment Toolkit on the PAS Website to be updated to reflect the new requirements.

Decision taking

In the policies on development management, the level of detail is appropriate.

3(a) Do you agree

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

3(b) Do you have comments? (please begin with relevant paragraph number)

The Council considers that Local Authorities and the communities they serve - are best placed to develop the vision and planning strategies needed for their areas. However the level of detail in the draft NPPF is not useful in directing Development Management.

The resource implications of speeding up processes and entering into pre-application discussions on multiple sites from developers taking a chance should be recognised.

Paragraph 54 - advises that local authorities should attach significant weight to the 'benefits of economic and housing growth'. There is a concern that environmental and social considerations maybe overlooked, especially in authorities were the local plan is not yet adopted.

Paragraph 56 & 57 - The Council supports the reference to the importance of pre-application engagement and front loading of consultation.

Paragraph 58 - there appears to be a contradiction between which states that the more issues considered at pre-application stage, the greater the benefits and the final sentence of the same paragraph which states that consents relating to how a development is built or operated can be dealt with at a later stage.

Paragraphs 64 & 65 - Whilst the opportunity to implement Local Development Orders, Neighbourhood Development Orders and Community Right to Build is welcomed, it is considered that further guidance on these mechanisms and the circumstances where they should be used should be given as soon as possible perhaps on the PAS Website, in order to ensure sustainable development principles are delivered.

Reference to article 4 directions should make specific reference in relation to Conservation Areas which often have a specific need for these powers to preserve the historic environment.

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

4(a) Do you agree

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

4(b) What should any separate guidance cover and who is best placed to provide it?

The Council considers given the size and scope of the draft NPPF and level of detail it contains, there will need to be supplementary guidance of a technical nature to many of the sections in order for it to provide useful guidance for local planning authorities. Without further guidance, the lack of clarity will lead to more scope for appeals, and determination by the courts.

The status of extra guidance should be made clear especially if published by external organisations. If external organisations were to produce separate guidance, they may not have the same consistency as current PPGs/PPSs and their guides. If additional guidance is produced externally it is important that it does not reflect the interests of specific organisations and is subject to wide consultation and stakeholder involvement.

Currently, Planning Policy Statements offer significant guidance/detail to local authorities, communities and developers and set the basis for consistent and robust decision making across the country. However the framework in its current form with no further guidance by the Government would lead to temporary gaps in policy.

The Government should identify the agencies to provide additional guidance e.g. statutory consultees such as the Environment Agency and English Heritage. Once those agencies are identified, specific timescales should be agreed to ensure that additional guidance coincides with the new framework so as to avoid gaps in policy.

Business and economic development

The 'planning for business policies' will encourage economic activity and give business the certainty and confidence to invest.

5(a) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

5(b) Do you have comments? (please begin with relevant paragraph number)

The Council agrees that for the most part, the 'planning for business' policies and the presumption in favour of sustainable development will encourage economic activity and will give businesses the confidence to invest. However this contradicts some of the proposals in the Governments Change of use from B1 to residential consultation which could mean that significant losses of employment land could occur and additional pressure to release green belt land would be the consequence. The Council has seen an increase in applications for change of use from B type uses since the consultation and the existing economic base is therefore considered to be under threat.

Paragraph 72 - The Council considers that for economic growth to be truly sustainable, it must be a medium/long term process to ensure that the right type of growth occurs in the right locations and is developed and constructed in a sustainable way. This needs to be made clear throughout this section.

Paragraph 73 - the Council considers that the economic development policies need to protect what's unique to an area that gives it it's niche or marketability and welcomes the need to identify and plan for new or emerging sectors that are *needed* in the area e.g. more skilled, better quality jobs.

Paragraph 75 - The Council considers that this conflicts with earlier paragraphs which set objectives to plan proactively (72) and identify strategic sites (73) and will bring extra transport and environmental impacts and costs.

5(c) What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

"Market signals" can be an unreliable basis for medium to long term planning. This should be recognised in guidance.
 Employment land reviews.
 Retail studies will assess the capacity for convenience and comparison retail alongside the health of existing centres.
 RSS – Evidence base

Market signals like losses to employment stock would be important.
 Also vacancy rates and churn rates/short term leases information.

The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.

6(a) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

6(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 76 & 80 - The Council generally supports the approach particularly retaining the focus on the town centre and continuing to define a hierarchy of centres. It should be explicit that a local level hierarchy should be considered to supplement this.

Paragraph 77 & 78 - Office developments no longer need to apply the sequential test although they seem to be recognised as a town centre use elsewhere in the framework so this needs to be clarified. The Council feels that this will encourage significant edge/out of centre office parks which could be damaging to the vitality and viability of centres. This will therefore have a negative effect on wider climate change objectives and could lead to traffic problems. However to help it could be clarified that local level policies could put limiting thresholds on the amount or floorspace for office needs outside of centres.

Paragraph 79 - does not provide guidance on what should be provided in the impact assessment and therefore additional information is needed. Policy EC14 of PPS4 currently provides helpful guidance in relation to this issue.

Paragraph 81- the proposals for sustainable economic growth in rural areas is supported. Reference is needed to protecting high quality agricultural land; this is picked up in natural environment, but it also needs to be referenced here. Agriculture forms a major part of the rural economy. The role of high speed broadband should also be acknowledged.

Transport

The policy on planning for transport takes the right approach.

7(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

7(b) Do you have comments? (please begin with relevant paragraph number)

No comment - Worcestershire County Council are the Highways Authority.

Communications infrastructure

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

8(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

8(b) Do you have comments? (please begin with relevant paragraph number)

No comments, however need to consider high speed broadband infrastructure in local plans.

Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

9(b) Do you have comments? (please begin with relevant paragraph number)

Paragraphs 100 – 106 - Worcestershire County Council is the Minerals Authority for our administrative area and it is therefore considered that they are best placed to comment on these policies.

Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

10(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

10(b) Do you have comments? (please begin with relevant paragraph number)

The Council overall supports the ambition to increase the delivery of new homes where this is in line with a local evidential approach.

Paragraph 28 - supports the emphasis on an evidence based approach (i.e. an ongoing role for SHMA, SHLAA etc) and would welcome the publication of more practice/methodological guidance to help steer a more consistent approach to evidence and studies such as the SHMAs to allow for greater comparability between areas (i.e. comparable data sets etc).

Consider that 'affordable housing' needs to be highlighted in the objectives. This is to ensure that the social objectives of sustainability are emphasised and achieved.

Paragraph 107- the council support the need to provide a choice of quality homes and creation of sustainable and inclusive mixed communities. However such housing should be brought forward through

the local plan, enabling transparent engagement with stakeholders and local communities. There is the risk of major sites being delivered outside the local plan, where such plans are not advanced and the 'presumption' would apply. This is highly likely to result in housing sites being brought forward at inappropriate locations with inadequate provision for strategic infrastructure, and the authority is being subjected to inappropriate planning applications because of this.

It is important that funding is available to support the regeneration and renewal mentioned in this paragraph.

Paragraph 109 - The Council considers that this decision should be left to Councils to take a local approach to reflect local circumstances, and may reduce the burden on Greenfield or green belt sites. The paragraph could also usefully include a statement on empty and underused homes, including space above shops.

The omission of the national minimum site size threshold for requiring affordable housing to be delivered is strongly supported. This will help increase the delivery of affordable housing.

The Council has significant concerns about the requirement for an additional 20% land supply, whilst it may well provide more housing land and provide additional flexibility in the market, it could also prevent harder to develop brownfield sites coming forward as quickly, as developers are given more flexibility continue to cherry pick easier to develop greenfield sites. This is at odds with the principles of localism and the move away from imposed targets. Disagree that windfalls should not be taken into account in the first 10 years of housing supply. Windfalls will continue to come forward and to exclude this element of supply is unhelpful.

Paragraph 110 - states that planning permission should be *granted* where relevant policies are out of date, for example where a local authority cannot demonstrate an up to date five year supply of deliverable housing sites. This is contrary to PPS3 paragraph 71 which states that where local planning authorities cannot demonstrate an up to date five year supply of housing they should consider favourably planning applications for housing having regard to other policies in the PPS. This proposed change will lead to pressure for unacceptable sites to be granted permission where an authority does not have a five year supply. Again this is at odds with the principles of localism, in particular, proposals to include people and communities in decision making. Paragraph 112 the proposal to allow some market housing as part of rural affordable housing schemes where this would facilitate the provision of significant additional affordable housing to meet local need is supported. This could help increase the supply of suitable sites for affordable rural homes.

It is also highly inappropriate for Local Authorities wanting and needing cross boundary development to be penalised against the delivery of five year supply of housing if a neighbouring authority is holding up the plan making process for them. It is requested that an urgent intervention is required for such authorities to establish the evidence based approach required so that local level plan making can continue.

It is considered that there should be references to gypsies, travellers and travelling show people in this section.

Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

11(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 127 sets out the positive approach to be taken to the development of schools and is supported.

Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

12(b) Do you have comments? (please begin with relevant paragraph number)

The Council consider that the policy relating to design is insufficient in terms of detail.

This section contains a number of statements with inspirational outcomes such as the achievement of high quality and inclusive design, however, it lacks detail with regard to how these outcomes can be achieved.

There should be references to supporting documentation e.g. By Design, Manual for Streets, Building for Life, Safer Places, Code for Sustainable Homes, BREEAM, Urban Design Compendium, Buildings in Context, Streets for All could be introduced?

The importance of landscape quality and trees – in terms of aesthetics, quality of life, mental and physical well-being and the impact of quality places on anti-social behaviour and sustainable travel is considered insufficient.

Paragraph 123 - the guidance in regard to outdoor advertisements is weak; there is no mention of good design.

Green Belt

The policy on planning and the Green Belt give a strong clear message on Green Belt protection.

13(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

13(b) Do you have comments? (please begin with relevant paragraph number)

As currently worded the message for the use and purpose of Green Belts appears to be no different materially than PPG2, just shorter in content.

The section would benefit perhaps from some shortening of the content on new green belt creation and perhaps more detail provided on exceptional circumstances in plan making such as meeting housing needs.

Paragraph 144 - the additions to the range of new buildings which are considered to be appropriate within the Green Belt are considered helpful.

Would be helpful if there was further guidance on terms such as

- “limited” eg and what if local need exceeds limited infilling and ‘limited affordable.
- “disproportionate”
- “not materially larger”.

Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

14(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 148 - while the overall objectives to mitigate and adapt to climate change are supported.

Perhaps the Governments intention for Code for Sustainable Homes could be more simply clarified in the early parts of this section.

The policy on renewable energy will support the delivery of renewable and low carbon energy.

14(c) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(d) Do you have comments? (please begin with relevant paragraph number)

Paragraph 152 -The reference to decentralised, renewable or low carbon energy supply systems in bullet point 5 needs strengthening. Rather than '*identifying opportunities*' there should be a presumption to incorporate such measures within new developments.

The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities.

14(e) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(f) Do you have comments? (please begin with relevant paragraph number)

Paragraph 153 - Agree that applicants should have to demonstrate why a particular area is suitable when it has not been previously identified by local authorities, further guidance should be provided on the criteria for identifying opportunity areas to ensure a consistent approach across different local authority areas.

The policy on flooding and coastal change provides the right level of protection.

14(g) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(h) Do you have comments? (please begin with relevant paragraph number)

Natural and local Environment

Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.

15(a) Do you agree?

- | | |
|---------------------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

15(b) Do you have comments? (please begin with relevant paragraph number)

Historic Environment

This policy provides the right level of protection for heritage assets.

16(a) Do you agree?

- | | |
|---------------------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

16(b) Do you have comments? (please begin with relevant paragraph number)

Impact assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

Planning for Travellers

18 Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

Specific questions on the impact assessment

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

QA5: What behavioural impact do you expect on the number of applications and appeals?

QA6: What do you think the impact will be on the above costs to applicants?

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

QB1.1: What impact do you think the presumption will have on:

- (i) the number of planning applications;
- (ii) the approval rate; and
- (iii) the speed of decision-making?

(i) Even in draft form since the NPPF has been on consultation in this local authority there has been a recognisable rise in planning applications on greenfield sites on the urban fringe on safeguarded land and green belt land. There has also been an increase in applications for change of use from B type uses to non-B type uses.
(ii) This is likely to increase
(iii) This is likely to decrease just because of the volume of applications likely. Also potential PINS to cope with workload with influx of Core Strategies submissions and appeals.

QB1.2: What impact, if any, do you think the presumption will have on:
(i) the overall costs of plan production incurred by local planning authorities?
(ii) engagement by business?
(iii) the number and type of neighbourhood plans produced?

(i) The presumption will leave a lot of local authorities without a local plan adopted and this could leave them subject to spiralling appeal costs. The costs to plan production will be minimal.

(ii) Even in draft form the emerging NPPF has spurred recognisable planning applications for change of use from B type uses across the authority areas

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

QB2.2: Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

There is a concern that the removal of a national brownfield target will make it harder to deliver the more difficult brownfield sites as developers favour easier to develop Greenfield sites. This will be to the detriment of urban regeneration objectives.

QB3.2: Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

Question the basis for the "at least 20%" figure. What evidence is this based upon and how do authorities determine the % uplift to apply?

Rather than opening up competition in the land market, this is likely to result in the delivery of Greenfield sites coming forward and the brownfield sites remaining undeveloped until at least later in the plan period. Although this requirement may help deliver homes, it is questionable as to whether these will be in the most appropriate locations and whether they will be delivered at the detriment of a coherent regeneration strategy for the Borough and the wider economic benefits this would bring.

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

No this will continue to be guided by local level affordable housing

viability assessment.

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

The costs of a Core Strategy are to exceed £1,000,000 for this Local Authority and the evidence base itself is likely to cost around ¼ of this.

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

QB4.1: What are the resource implications of the new approach to green infrastructure?

More staff resources will be required to develop the evidence base or more resources will be needed to employ consultants to undertake this work at a time when local authorities resources are severely stretched. Greater collaborative working with statutory agencies will be required and it is questionable as to whether or not they will have adequate resources as well.

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

QB4.5 Will your approach to renewable energy change as a result of this policy?

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?