Consultation: National Planning Policy Framework[1]

Community Planning Alliance Response

Questions

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?

To be effective, all National Development Management Policies should be clear and definitive and should be statutory otherwise they will be meaningless. Their content should be limited to the following:

1. Monitoring and demonstrating that the policies within the NPPF are being effectively implemented. This should particularly include whether developments that have been approved are genuinely sustainable, in accordance with an agreed definition of Sustainable Development. Please see our proposed definition in this document https://communityplanningalliance.org/wp-content/uploads/2026/01/260113_CPA-Definition-SUSTAINABLE-DEVELOPMENT_Jan26.pdf

We believe that much of the development being approved is not actually sustainable due to, for example, a lack of sustainable passenger and freight transport (leading to continued car/HGV-dependent development), lack of provision of public services (such as schools, health services and retail), schemes constructed on green spaces that are essential to support climate mitigation and nature's recovery (irreplaceable habitats and other environmental/ecology-rich areas, loss of sports facilities and other public amenities, etc).

The government should be monitoring and reporting all incidents of unsustainable development being approved, should acknowledge the issues and publish further guidance and instruction to ensure improvements to the achievement of the stated purpose of planning.

Furthermore, the government has committed to ensuring the ability of communities to influence the plans for their areas, National Development Management Policies should enforce these requirements, including, for example:

The Civil Society Covenant states that the government will "*Promote participation and inclusion by involving people in decisions that affect their lives, ensuring their voices are heard and removing barriers to democratic participation*" and "*Strengthen trust with open communication and sharing of information, data, and best practice, and by civil society organisations being proactively transparent and accountable for the money they receive*". This is not happening with planning, which is clearly developer-led.

[1] https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system

The government's Pride in Place Strategy states that the programme has three core objectives, one of which is "*To empower people to take back control – Everybody should be empowered and in control of their lives and have a say over the future of their community*". We do not believe local people have control, planning is being driven by what will benefit the developers, not what will benefit communities.

2. National Development Management Policies should also reflect the public's values on nature and the environment and ensure these issues are given substantial weight in planning. These two research reports from More In Common, for example, highlight the importance communities place on nature and the environment:

Parks, pride and place The role green spaces can play in building pride in place and support at the ballot box: (https://www.tcpa.org.uk/fix-the-parks-to-prove-you-can-fix-the-country-say-voters/) – the key findings include that green spaces and nature are Britons' greatest source of local pride, most Britons do not think that politicians care about their community, mental health is the number one benefit to Britons of green space, there is a clear mandate for the government to invest in improving Britain's green spaces, safety concerns are the biggest barrier preventing Britons from enjoying more time in their local green spaces, improving parks and green spaces is a meaningful political priority for Britons.

All Under One Roof How Britons understand nature's place within the housebuilding agenda: (https://www.rspb.org.uk/whats-happening/news/new-report-shows-people-dont-want-new-homes-to-be-built-at-natures-expense) – the key findings include that people want developers to build with care, improving the quality of new homes, and ensuring developments protect and enhance nature, nature is a necessity not a luxury, 43% of British people are more likely to vote for a party that prioritises nature conservation, compared with only 10% who say they're more likely to vote for one prioritising housebuilding, voters of all parties see both issues as important, and reject the idea that one can only happen at the expense of the other, 72% of the public think more positively of politicians who say, "*New housing and infrastructure should integrate with the natural world, not destroy it*.", politicians are seen as out of touch with the public's values on nature, only 14% of British people think politicians are aligned with their values on nature, while two-thirds (67%) say politicians are out of touch on the issue, supporters of all major parties want to see habitats safeguarded, green spaces preserved, infrastructure developed alongside housing, and more affordable homes built.

We recognise that there has been significant planning policy change since the new Government came to power, leading to considerable uncertainty for councils, citizens and developers. This has had, and will continue to have, a detrimental impact on councils attempting to prepare local plans. We do not believe further uncertainty or complexity should be introduced to the planning system for at least a year.

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.

Strongly Agree

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.

We provide our response below in relation to each Annex:

Annex A: Implementation: **Strongly Agree**

Annex B: Glossary: **Partly Disagree -** a number of definitions have been changed significantly and there are challenges with others. We set out below our support and/or concerns:

We would like to propose a specific definition of '**Sustainable Development**' be included in this glossary to ensure that unsustainable development is recognised, acknowledged, monitored and reported. Please see our proposed definition in this document https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2026/01/260113-sustainable-development-definition.pdf

We are concerned that the definitions of '**Major Development**' and '**Medium Development**' currently overlap and, therefore, bring huge levels of uncertainty. Especially given that there are very few references to 'Medium Development' in the draft text (although we recognise there are questions in this consultation and more information in the guidance).

If the concept of '**Medium Development'** is to be agreed, the definition of **'Major Development'** must be updated (we assume to developments of 50 homes or more and/or an area of more than 2.5 hectares). All policies reflecting the requirements for '**Major Development'** must be updated to confirm the associated requirements for '**Medium Developments'.** We would anticipate, for example, that the Golden Rules (GB8) will apply to both **Major** and **Medium** development in the Green Belt.

The definition of **'Affordable Housing**' should be limited to genuinely affordable homes, social housing. What is called 'affordable' housing to buy is typically not affordable - a 20% discount on a market home costing £500,000 means that the purchase price would be £400,000. A 20% discount on a rental of £1,500 per month would still be £1,200 per month. Neither figure would be considered 'affordable' by many citizens (including the most vulnerable in our society). Such properties should be described as 'discounted' homes, not Affordable Housing. A more meaningful definition of affordability would be based on a percentage of a household's net income (after tax), allowing money for essentials like food and heating, rather than affordability related to local market rates.

We **strongly disagree** with the changes to the definition of **Grey Belt**, which should revert to the previous wording that confirmed "*'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*". This would ensure that land that is identified as Grey Belt, is actually Grey Belt.

Whilst footnote 7 appears to have been replaced by footnote 23, this footnote has been diluted from the previous version (removing the reference to previous paragraph 194, and to previous footnote 75). Footnote 23 should be moved to the substantive text (as per the intention set out on page 13 of the guidance to this consultation) and should include reference to the omitted items.

The stated purpose of the change to this definition is that the previous wording gave Green Belt too much protection, yet already the Grey Belt rules have resulted in significant harm to the Green Belt in areas that clearly do not meet the government's rhetoric about ugly land and disused petrol stations. Unsustainable development in the countryside and on farmland around villages is the result of this policy. See the CPA Grey Belt report: https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251024_greying_the_greenbelt_oct25.pdf

We **strongly agree** with the change to the definition of **Ancient or veteran tree**s (which deletes the word 'and' and replaces it with the word 'or' before the word 'condition'.

We are concerned that the definition of '**Connectivity**' does not include any reference to what constitutes a "high level of connectivity" (frequency and affordability of services, for example). Furthermore, the 'Connectivity Tool' must undergo robust testing before becoming the accepted tool for determining sustainability and the public must have full access to the tool to understand the basis on which decisions are being recommended or have been made.

To ensure delivery of the objective set out at Chapter 19, the definitions for '**Ecosystem services**', '**Green infrastructure'** and '**Natural Capital**' must be extended to confirm that their benefits must be given a substantial weighting when considering the planning balance. Each must also be better defined and it should be recognised that natural capital and ecosystem services, for example, have an economic value contributing a total asset value of around £1.8 trillion in 2022 (https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2024). Assets and attributes include clean air, fresh water, pollination, food, raw materials, climate regulation, flood control, recreation, and spiritual well-being, categorised primarily as provisioning (food, water), regulating (climate, disease), supporting (soil formation, nutrient cycles), and cultural (recreation, aesthetics).

The definition of '**Nature based solutions'** must be extended to confirm that the potential for creating such solutions in a location must be given a substantial weighting when considering the planning balance.

We'd like to see the definition of '**Brownfield Land Registers**' strengthened to support the achievement of the government's goal to make "*as much use as possible of suitable brownfield sites*". With this in mind, spatial and local planning authorities must be obliged to identify brownfield sites across the plan area (beyond the narrow restrictions of The Town and Country Planning (Brownfield Land Register) Regulations 2017, to create an opportunity brownfield list in addition to a list of 'suitable', 'available' and 'achievable' sites), in collaboration with affected communities (who will have more knowledge of such sites). The authorities must bid for funding to bring these sites back into use.

We believe the regulations need to be updated to address the issues that currently exclude sites from Brownfield registers, including size constraints and availability. Brownfield registers should also be expanded to look at urban capacity and sites which may come forward at some point in the future when circumstances/economics change.

What constitutes '**radical reductions** in greenhouse gas emissions' should also be defined to ensure developers and councils are achieving this policy.

The '**Green Belt'** should be defined as land which meets the requirements of one or more of the five purposes set out at GB2.

We think the government should look again at the very confused definitions of '**Town Centres', 'Edge of Centre', 'Out of Centre',** and **'Out of Town'**.

'**National Parks**' and '**Broads**' should be defined explicitly in the glossary.

Annex C: Information requirements: **Partly Disagree** - this Annex should make it clear that all information provided to support plan-making or decision-taking must comply with the principles of the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services), which all stakeholders should comply with and which requires that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

Proportionate in relation to information requirements must mean 'proportionate' - not minimal! This means there must be a relationship between the information provided and the importance of the policy and/or the data.

As we set out in our 'Sustainable Development' report mentioned in response to Annex B above, the information provided to support plan-making and decision-taking must be sufficient to determine that sustainable development has actually been achieved. These information requirements should be reflected here.

Furthermore, this list of information requirements is incomplete. There are no information requirements listed in relation to the conservation of our natural capital. The requirement to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks has been omitted from this draft text, along with footnote 68, which provides important guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. This requirement should be reinserted, even if it is anticipated that such data will be provided in documents such as the LNRS. The data requirements in relation to the environment, habitats, species and/or ecological networks for planning purposes must be explicit and must be considered as important and essential as that provided to demonstrate economic growth requirements or housing need.

In addition, the information requirements set out in PM1 (to use maps and diagrams), for example, is not included in this list, nor is the information to support a Green Belt Assessment (mentioned at Annex E).

Annex D: Housing calculations and supply: **Strongly Disagree** - Annex D should be extensively amended, LPAs should be monitored on their ability to house their communities in safe, secure and affordable homes, not on whether there is a 5 year supply of land for market housing. Land availability should be assessed in accordance with the outcome of the Strategic Housing and Employment Market Assessments.

There are a number of serious flaws associated with the Standard Method as currently set out in Annex D: Housing calculations and supply; most importantly that it is unlikely to assist in the delivery of an increased level of housing that is actually affordable to local people (ie related to their ability to purchase on a median wage).

Firstly, the affordability adjustment, step 2 of the method (paras 5-7 of Annex D), results in an implicit incentive for developers to build at above the median average house price (assuming there is no change in median workplace-based earnings). There is no government policy that mandates developers deliver houses that are below the local median house price, or indeed at a level which would lower the affordability ratio. For every house delivered at above median price, the affordability ratio increases, and as a corollary so does the standard method housing need target. No housebuilder will deliver so many houses that their product price is diminished and so they will just alter/stretch out their absorption rate for the area accordingly to maintain price levels. They will be rewarded for this delay by an increased target in the following years for that plan area, which means they can cherry pick the most profitable sites (not the most affordable ones for local people). This same process will be repeated year on year, and the target will never be achieved. This undermines the entire premise behind the affordability adjustment.

The proposed buffer of an additional 20% to the five year housing land supply (para 9(b) of Annex D) simply encourages developers to delay delivery even more than suggested above. The longer they delay, the higher the resulting housing target and the same vicious circle commences.

The Housing Delivery Test and consequent penalties (para 12(a), (b) & (c) of Annex D) are entirely outside the local planning authorities control and entirely within the purview of developers. If as set out above, they choose to delay build-out rates to maintain their price point, then the local authority will fail the Housing Delivery Test.

If 95% is reached, then the local authority needs to prepare an action plan, putting them yet again at the mercy of the developers to realise any improvement, an outcome which is not in the developers own business interests.

If 85% is reached an additional buffer will be imposed, resulting in an increased and even less achievable target, with the likelihood of incentivising the developers to delay even more.

If only 75% is reached, then the so-called evidenced unmet need is deemed to exist and the presumption in favour comes into effect. This will result in Policy S5(1)(j) development sites outside settlements (ie in the countryside) being permitted that are not sustainable nor desirable. It is in the developers' interests for an authority to fail the Housing Delivery Test. They might not even make applications for difficult urban sites simply so as to trigger the presumption on more profitable sites (needless to say, which are not more affordable).

Critically, Policy S5(1)(j) states that "*development should be approved outside settlements*" where: "*Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites[27] or scores below 75% in the most recent Housing Delivery Test[28]*)". These two criteria (referenced to the standard method in Footnotes 27 and 28) will almost inevitably NOT be met in most rural local authorities.

Most developers wish to build expensive homes in the countryside (as it is the most profitable), and Annex D linked with Policy S5(1)(j) simply enables and empowers that business model. At the very least there should be policies that:

a) mandate delivery of housing below median prices, so that the affordability ratio is gradually reduced

b) any Housing Delivery Test should apply to allocations and permissions granted but not built, so that developers are not able to trigger the presumption for countryside sites by either failing to make applications or failing to build out permitted sites

c) a 'use it or lose it' policy for permissions that are not built out.

Annex E: Green Belt assessments: **Partly Agree** - the Grey Belt element of the assessment should explicitly identify whether the land considered to be Grey Belt has been previously developed (petrol stations and car parks as per the government's rhetoric) or whether it is greenfield land with natural capital value.

Annex F: Managing flood risk and coastal change; **Partly Agree** - the note on page 122 confirms that this data is incomplete. As a minimum, Table 3 should be updated to include the impact of surface water flooding on the Vulnerability Classifications.

Furthermore, we note that: "*All viability assessments should reflect the recommended approach in planning practice guidance, utilising the standardised inputs set out in [Annex X – to be added subject to the outcome of this consultation*". An Annex X for viability should have been included and must be issued for consultation as soon as possible.

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

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

Partly Agree

This is a systemic issue. The entire planning system is plagued with undefined labels which need further definition to bring certainty to all stakeholders. All such definitions must be objective and supporting information must be required to be verifiable rather than assumptions based. If the aim is to make the planning system more rules-based, the rules must be clearly set out (as they are in the Gunning Principles, for example (https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf).

Whilst we agree that it makes sense to replace the use of three different words (great, significant, substantial) throughout the NPPF with one word, 'substantial', each occurrence of the word 'substantial' must be supported in the glossary by a clear definition setting out how 'substantial' should be interpreted. This may not, in all cases, be a numerical description but the level of magnitude must be explicit. In addition, the word 'substantial' must not be over-used in relation to, for example, achieving the economic objectives in the NPPF and under-used in relation to the environmental objectives.

Furthermore, this change should be supported by a clear definition of the term 'sustainable development', given that chapter 1 of the Framework is not "*intended to be read as substantive policy for plan or decision-making*". Please see our proposed Sustainable Development definition in this document https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2026/01/260113-sustainable-development-definition.pdf

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 disagree.

The government suggests that "*the plan-led approach is, and must remain, the cornerstone of our planning system*" and that "*Development plans are the best way for communities to shape decisions about how to deliver the housing and wider development their areas need*". With this in mind, the policy should consider the following:

- Given that the proposals in an SDS will be fixed and firm once approved, and that they will have a huge impact on local communities, there must be opportunities for affected citizens to be fully involved in the plans for their areas. They should be able to participate from the beginning of the SDS process, including demonstrable engagement in determining the priorities for development in an SDS (a number of mechanisms can be used to deliver this commitment, including citizen panels). A Citizens' Planning Advocate should be appointed in each SDS area. This approach will not only raise awareness within communities of the importance of particular infrastructure needs, it will ensure public bodies are aware of the concerns and priorities of communities and will reduce subsequent plan and planning application challenges. Affected communities must also be further consulted as the SDS is developed and prior to examination. SDS policies and proposals must be well publicised - independent surveys should confirm that at least 30% of the adult population in affected areas are aware of, and support, the SDS and its policies and proposals.
- To ensure sustainable development, planning for infrastructure at a strategic level should come before planning for housing and/or employment. Transport planning must be integrated with spatial planning. PM1 sets out a 'shopping list' of isolated items but does not attempt to bring them together as a strategy should. At the very least, point f should be moved to the top of the PM1 list. It is essential that we move from the requirement to identify sites for housing and employment first, and backfill the need for infrastructure and services afterwards, as happens currently.
- A brownfield first strategy needs to be embedded in PM1 so that it becomes a core part of the spatial strategy. The spatial planning authority must be obliged to identify brownfield sites (in collaboration with affected local communities, who will have more knowledge of such sites) across its area and bid for funding to bring them back into use. Brownfield registers are however currently too prescriptive in terms of size constraints and availability, which means that large numbers of possible sites are excluded. Brownfield registers should be expanded to look at urban capacity and sites which may come forward at some point in the future when circumstances/economics change.

- An empty homes strategy must be part of PM1. A spatial delivery authority must be obliged to bring empty homes back into use before using greenfield. Data is available courtesy of the Empty Homes Agency. https://www.actiononemptyhomes.org/facts-and-figures
- A commercial conversion strategy must be part of PM1.
- There must be a density requirement for a strategic planning authority, to reduce land take and to increase the critical mass of population for public transport and services, and to reduce car-dependency.
- Where there is inadequate water or sewage capacity, spatial planning authorities must be allowed to refuse to meet housing targets.
- There must be a requirement to avoid best and most versatile farmland and to demonstrate re-use of existing land (brownfield, conversions and empties).
- Strategies must avoid any development on irreplaceable habitat.
- To ensure sustainable development, energy initiatives must be located on previously developed land (not greenfield sites), solar should be on rooftops or carparks, for example.
- Policies must be in place to ensure that planning processes and approvals do not increase the burden on, or costs for, other parts of the public sector. As an example, given the mental and physical health consequences, large (mega) warehousing developments must not be proposed in close proximity (defined as closer than 500m) to residential properties, nature conservation areas or heritage assets. See our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.
- Proportionate (criterion h) must mean 'proportionate' - not minimal! This means there must be a relationship between the information provided and the importance of the policy.

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 Disagree.

Changes should only be made when the spatial planning authority deems that there has been a material change of circumstances. The constant requirement to review plans and strategies is a waste of taxpayers' money, causes uncertainty and takes up officer time.

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.

Strongly Disagree.

Given that the "*government is clear that the plan-led approach is, and must remain, the cornerstone of our planning system*", there should be no five year housing targets. They result in developer-led unplanned development (under the presumption), which is the opposite of the government's aims. The government is aware that planning authorities have no control over what is built out. The 'presumption' leads to unsustainable development at the whim of the private sector.

If the government wishes to continue with the current developer-led system, local planning authorities should be able to include planning applications approved but not delivered within their housing land supply and delivery test calculations, along with all suitable, available and achievable brownfield land supply.

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 disagree.

The vision (under PM2, 1a) for local plans is meaningless. It has no policy weight and sets expectations too high, when the reality is that communities know that all a local plan does is to allocate the housing numbers forced upon them by the government and/or release Green Belt land.

The NPPF should be honest that it is simply the mechanism by which the government seeks to distribute housing numbers through Local Plans and the presumption.

There is nothing in the NPPF to compel compliance with its policies, or those in spatial or local plans. They are, therefore, cherry-picked by local planning authorities and developers, particularly on the basis of the 'substantial weight' being accorded to economic growth. This means that the public money spent developing and examining these plans is wasted. This needs to be addressed in one of two ways, either the notion of planning is abandoned as it is not adhered to, and the government acknowledges that they have a developer-led system. Alternatively, the NPPF is strengthened to confirm that the planning system is genuinely rules-based and that those rules must be complied with.

This is important because there is currently significant bias in the planning system. As an example, communities are unable to appeal an approval, even if a planning application does not comply with plan policies. Citizens, therefore, have no certainty and they are only able to challenge a planning application approval through a judicial review. This is unaffordable for less-affluent communities but not necessarily so for those who are wealthier, leading to a 2-tier planning system.

Furthermore, consistent achievement of sustainable development would be possible if this Framework was plan-led, rather than developer-focused. CPA's recent Homes for Everyone report (https://homesforeveryone.org/Homes-For-Everyone-Report.pdf) demonstrates that there are sufficient resources to significantly exceed the government's housing targets, for example.

With this in mind, as with PM1, the following should be embedded in Local Plans, under PM2 to ensure achievement of sustainable development:

- A brownfield first strategy needs to be embedded in PM1 so that it becomes a core part of the spatial strategy. The spatial planning authority must be obliged to identify brownfield sites across its area (in collaboration with local communities) and bid for funding to bring them back into use.
- An empty homes strategy must be part of PM1. A spatial delivery authority must be obliged to bring empty homes back into use before using greenfield.
- A commercial conversion strategy must be part of PM1.
- Whilst we note the requirement to consult in PM6, this should also be reflected in the vision in PM2, which should highlight that, given that the proposals in a local plan will be fixed and firm once approved, and that they will have a huge impact on local communities, there must be opportunities for affected citizens to be fully involved in the plans for their areas. The vision should confirm that local plans will be developed in consultation with affected communities, who should be able to participate from the beginning of the process, including demonstrable engagement in determining the priorities for development. A Citizens' Planning Advocate should be appointed in each local plan area. This approach will not only raise awareness within communities, it will ensure public bodies are aware of the concerns and priorities of communities and will reduce the later plan and planning application challenges. Affected communities must also be further consulted as the local plan is developed and prior to examination. Local Plan policies and proposals must be well publicised - independent surveys should confirm that at least 30% of the adult population in affected areas are aware of, and support, the local plan and its policies and proposals.
- To ensure sustainable development, energy initiatives must be located on previously developed land (not greenfield sites), solar should be on rooftops or car parks, for example.
- Local plans should not allocate best and most versatile agricultural land or irreplaceable habitats.
- Policies must be in place to ensure that planning processes and approvals do not increase the burden on, or costs for, other parts of the public sector. As an example, given the mental and physical health consequences, large (mega) warehousing developments must not be proposed in close proximity (defined as closer than 500m) to residential properties, nature conservation areas or heritage assets. See our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.

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.

Yes.

Fifteen years should be the maximum period for a local plan to cover as local planning authority assessments on the suitability, availability, achievability and/or any constraints to development within their SHLAAs and SELAAs do not typically go beyond this period. Longer timeframes can, therefore, be based on inadequate, inaccurate or misleading information.

We agree that plan-making periods could shift to less than ten years, given that it is very difficult to allocate sites for housing or employment beyond ten years, particularly given the amount of speculative development that is approved. The potential for windfall sites is also inadequately assessed.

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.

Partially Agree.

We believe that LPAs should be able to exceed national policies if they choose to.

In addition, PM1(d) should be strengthened to explicitly confirm that local plans will be developed in consultation with affected communities, who should be able to participate from the beginning of the process, including demonstrable engagement in determining the priorities for development. A Citizens' Planning Advocate should be appointed in each local plan area. This approach will not only raise awareness within communities, it will ensure public bodies are aware of the concerns and priorities of communities and will reduce the later plan and planning application challenges. Affected communities must also be further consulted as the local plan is developed and prior to examination. Local Plan policies and proposals must be well publicised - independent surveys should confirm that at least 30% of the adult population in affected areas are aware of, and support, the local plan and its policies and proposals.

The general principles should also include a policy to ensure that planning processes do not increase the burden on, or costs for, other parts of the public sector. As an example, given the mental and physical health consequences, large (mega) warehousing developments must not be proposed in close proximity (defined as closer than 500m) to residential properties, nature conservation areas or heritage assets. See our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.

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.

Partly Agree.

LPAs should be allowed flexibility to slow down the process if required, such as with Colchester's current local plan review, where the infrastructure evidence base was deemed inadequate by councillors, and a proposed consultation was postponed until more work had been carried out.

PM7 1d must be strengthened to explicitly confirm that impacted citizens are 'critical to the delivery of the plan' to minimise the disruption to the timetable caused by the current lack of adequate involvement of communities. Engagement with elected representatives is not an alternative to explicit regular engagement with impacted citizens (Councillors often 'toe the party line' rather than making representations on behalf of the people they represent).

This policy should make it explicit that local plans will be developed in consultation with affected communities, who should be able to participate from the beginning of the process, including demonstrable engagement in determining the priorities for development. A Citizens' Planning Advocate should be appointed in each local plan area. This approach will not only raise awareness within communities, it will ensure public bodies are aware of the concerns and priorities of communities and will reduce the later plan and planning application challenges. Affected communities must also be further consulted as the local plan is developed and prior to examination. Local Plan policies and proposals must be well publicised - independent surveys should confirm that at least 30% of the adult population in affected areas are aware of, and support, the local plan and its policies and proposals.

Mineral and waste plans should make it clear whether the status of existing peat in the plan area is to be included (including a Natural England assessment of whether the peat is irreplaceable and restorable) and whether any peatland restoration is expected to be referenced in the plan.

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 Disagree.

To ensure sustainable development, plan evidence should be compliant with the principles in the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services), which requires that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

There is no justification for evidence documentation that does not meet these criteria.

The following phrase will be subject to conflict at examination, "*3. Evidence related to development needs should be considered up-to-date if it has been produced using appropriately up-to-date information and data*." It is meaningless. 'Up-to-date' will have to be quantified/defined.

In addition to 'baseline' evidence, there must be evidence supplied about the future impact of options presented at each stage. For example, baseline air pollution data should be provided along with an analysis of the air pollution impact of preferred options and of site allocations.

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 Disagree.

- Planning for infrastructure at a strategic level should come before planning for housing and/or employment. Transport planning must be integrated with spatial planning. It is essential that we move from the requirement to identify sites for housing first, and backfill the need for infrastructure and services afterwards, as happens currently.
- A brownfield first strategy needs to be embedded in PM9 so that it becomes a core part of the spatial strategy. The LPA must be obliged to identify brownfield sites across its area and bid for funding to bring them back into use. This must be rigorously tested at examination as often Brownfield Land Registers are out-of-date and cover the bare minimum of land in the district.
- An empty homes strategy must be part of PM9. An LPA must be obliged to bring empty homes back into use before using greenfield.
- A commercial conversion strategy must be part of PM9.
- There must be a density requirement, to reduce land take and to increase the critical mass of population for public transport and services, and to reduce car-dependency.
- Best and most versatile agricultural land and irreplaceable habitats should not be identified for development.
- To ensure sustainable development, energy initiatives must be located on previously developed land (not greenfield sites), solar should be on rooftops or car parks, for example.
- In relation to employment land, large (mega) warehousing developments must not be proposed in close proximity (defined as closer than 500m) to residential properties, nature conservation areas or heritage assets. See our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.

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 Disagree.

These policies will not result in the delivery of the necessary infrastructure to support sustainable housing and employment development.

16) Do you agree that policy PM12 increases certainty at the 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.

We cannot see how what is proposed is very different from the current process.

The simplest way to increase certainty would be to scrap Section 106 and make the Community Infrastructure Levy obligatory for all LPAs so that a fixed amount of developer funding can be collected per new dwelling and/or m^2 employment space. If the developer wanted to provide on-site infrastructure to the same value instead of paying the CIL amount, that could be negotiated, but the starting position would be fixed and non-negotiable.

CIL funding relating to employment space must take into consideration the impact on local public services of increased air, noise, light, vibration, dust and water pollution, especially from road-based freight transport. Large numbers of additional employees will also drive up pollutants unless there is sufficient sustainable passenger transport to meet need.

Changes should not be made following agreement of contributions unless by exception that is approved by the MHCLG.

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.

Partly agree.

National policy should set clearer expectations. There should be no reference to a developer profit range of 15-20% in the viability guidance (this does not apply to SME developers in any event, and it could be argued that they need the most support). There should be no opportunity for a developer to renegotiate. A developer should apply for planning permission on the basis that they will be delivering on policy requirements. Ideally, this would mean a fixed CIL sum per dwelling, but in the absence of this, a developer should take out insurance or have a contingency in place for any cost increases incurred post planning consent. Poor financial planning by a developer must not result in obligations not being delivered. There is huge distrust in the system currently because of the frequency of renegotiations by developers/housebuilders. It is very simple: if a developer cannot deliver in accordance with policy, they should not build.

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.

Strongly disagree.

LPAs should be able to set their own local-specific quality standards. BNG is one example, and LNRS another. In addition, it may be important for public safety reasons that locations which are impacted by, for example, COMAH zones are required to meet specific standards for those sites.

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 Disagree.

PM14 2b (Appropriate) should include the requirement to avoid greenfield land unless all brownfield, empty homes, commercial conversions and density maximisation options have been exhausted. An Inspector should examine the district's unbuilt planning permissions list and where developers' have not commenced work on an allocated site within a reasonable period, the site should be de-allocated as part of the Plan's examination.

Growth should not be limited to economic growth. An SDS or a local plan must address all the growth needs (the growth of the rural economy, and the growth to support the health and wellbeing of communities, the environment and nature, for example).

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?

There is no question about PM4 (Supplementary Plans). We disagree that such plans should be able to allocate sites for development (criterion 3) outside of the local plan cycle. This will lead to significant uncertainty. In addition to the suggestions set out at criterion 1, Supplementary Plans should be limited to providing a mechanism to publish a detailed masterplan for a site previously allocated in a local plan.

LPAs should be supported to follow a rigorous greenfield last approach, with policy requirements to use brownfield land, bring empty homes back into use, convert empty commercial or public buildings, maximise density on ALL sites and de-allocate sites which are not built out. LPAs should be supported with funding for all of the above.

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.

Strongly disagree.

All information provided with proposals for development should comply with the principles set out in the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services), which requires that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

There is no justification for documentation that does not meet these criteria.

All local authority Statements of Community Involvement should be reviewed and should be required to involve citizens in that review.

At a national level, guidance should confirm that no planning applications will be validated by local planning authorities in December or August and developers are not expected to propose community engagement over the two week Christmas/New Year period or in August.

Developers should provide evidence that their scheme is supported by communities, otherwise the development should be refused.

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.

Partly Agree.

As mentioned above, all information provided with proposals for development should comply with the principles set out in the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services), which requires that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

There is no justification for documentation that does not meet these criteria.

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

Yes regulations should be clear that the Green Claims Code applies to planning related documents. Incomplete, inaccurate or misleading information leads to planning officers and/or planning committees making decisions based on inadequate data. The principles in the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services) require that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

There is no justification for evidence documentation that does not meet these criteria.

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.

Strongly disagree.

This section reads like a 'how to help the developer get permission quick' list.

To ensure balance, and sustainable development, Section DM3 must include reference to the introduction section of the NPPF, "*Purpose of the Planning System*", paragraphs 14, 15, 16 and 17: the UN 17 Global Goals for Sustainable Development and to the three pillars of sustainability and an explicit definition of sustainable development. Please see our proposed definition in this document https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2026/01/260113-sustainable-development-definition.pdf

Stakeholders must be asked for their input, and those stakeholders must include communities. Section DM3 should include a requirement to take on board community submissions.

DM3 must also highlight circumstances which would require development not to be approved. If development does not comply with national, spatial or local plan policies, for example, or if the development would have an unacceptable impact on the local community (such as mega warehouses in close proximity to residential properties as set out in our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf), or if it is likely to increase the costs for other public bodies (such as mental or physical health services), or result in a requirement for government funding (such as flood risk insurance, for example).

As an example, if the local plan **requires** a development in the allocation area to be in accordance with a masterplan that has been developed in consultation with the local community and approved by the local planning authority, if that masterplan has not been developed, the application should be considered premature and must not be approved as it would result in a loss of trust in the planning system and a huge loss of certainty for communities. It is inappropriate for LPAs and/or planning inspectors to conclude that the benefits of a proposal outweigh a **requirement** set out in a local plan - otherwise the word is meaningless and should not be used in a planning context.

Please note that the example above also relates to criteria 2 and 3 in policy DM4, which discuss prematurity of planning applications but there are no questions relating to DM4. Spending public money creating plans and policies that will not be complied with is not in the public interest, is not value for money and results in significant confusion and uncertainty for communities.

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.

Strongly disagree.

Paragraph 2 (a-d) should be removed from policy DM5.

There should be no circumstances where a developer should renegotiate. They should carry out their financial planning thoroughly and include a contingency and/or insurance should costs rise unacceptably. The local community, those needing affordable housing and the environment, must not suffer because of poor financial planning on the part of a developer. Either they deliver a policy compliant development, or they should not build it.

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

It remains with too many developer-friendly caveats, which means that the policies will have no impact on improved delivery of developer obligations.

As set out above:

- There should be a flat-rate, non-negotiable. CIL-style payments per dwelling (or per m^2 for employment development), and section 106 should be abolished.
- There should be no reference to a need to protect a developer's 15-20% profit margin anywhere in planning guidance.
- No developer should be allowed to renegotiate their obligations under any circumstances. They must carry out robust financial planning that includes a generous contingency and/or take out insurance that covers any cost increase.

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.

As set out above:

- There should be a flat-rate, non-negotiable. CIL-style payments per dwelling (or per m^2 for employment development), and section 106 should be abolished.
- There should be no reference to a need to protect a developer's 15-20% profit margin anywhere in planning guidance.
- No developer should be allowed to renegotiate their obligations under any circumstances. They must carry out robust financial planning that includes a generous contingency and/or take out insurance that covers any cost increase.

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

As set out above:

- There should be a flat-rate, non-negotiable. CIL-style payments per dwelling (or per m^2 for employment development), and section 106 should be abolished.
- There should be no reference to a need to protect a developer's 15-20% profit margin anywhere in planning guidance.
- No developer should be allowed to renegotiate their obligations under any circumstances. They must carry out robust financial planning that includes a generous contingency and/or take out insurance that covers any cost increase.

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.

Partly Agree

DM6 1 should explicitly state that planning conditions may be applied to ensure development is sustainable and accords with an explicit Sustainable Development definition. Please see our proposed definition in this document https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2026/01/260113-sustainable-development-definition.pdf

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

DM7 1 should be reworded to state that 'Where they have land-use implications, matters which are controlled by separate regulatory regimes **must**, in the context of a particular development proposal, be a material consideration'. There should be no scope for developers or councils not to abide by regulations relating to public safety, for example.

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.

Strongly Agree

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?

These policies are toothless unless the LPAs have robust powers of enforcement and are able to act quickly. There should be regional out-of-hours enforcement teams when an LPA enforcement office is closed, as many breaches occur over holiday periods or weekends. For enforcement to be taken seriously, it must happen fast and firmly, otherwise people will continue to use the retrospective planning system to gain permission. Large scale developers must be treated in the same way as householders or SME developers in relation to enforcement.

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.

Partly agree.

The policy should be updated to confirm that Article 4 should be used to prevent permitted development on irreplaceable habitats. There is currently nothing in the permitted development regulations to prevent development on irreplaceable habitats, which puts them at risk from, for example, temporary roads to access development sites.

Additionally, Article 4 should be used when protecting heritage assets such as in Conservation Areas where proliferation of features that would normally be permitted would be unacceptable.

The presumption should be that the LPA is correct when providing evidence.

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.

Strongly disagree.

LPAs should be supported to follow a rigorous greenfield last approach, with policy requirements to use brownfield land, bring empty homes back into use, convert empty commercial or public buildings, maximise density on ALL sites and de-allocate sites which are not built out. LPAs should be supported with funding for all of the above.

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.

Strongly Agree

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.

Strongly Disagree

A presumption in favour of sustainable development should be able to monitor and report whether sustainable development has actually been achieved. All development proposals must, therefore, be assessed and reported against sustainability criteria, which should include current land use, for example.

If the land is brownfield/previously developed, and the location is able to optimise density, the sustainability criteria for land use is met. Conversely, if the location is a site of high natural capital or ecosystem service value, including irreplaceable habitats, a site at a heightened risk of wildfires and/or land that could offer nature-based solutions to support climate mitigation (for example, or a site that will support the creation of wetlands, food security, carbon capture and storage) - the sustainability criteria is not met.

Other sustainability criteria to be assessed should include access to public and social amenities (for example, health services, educational establishments, green spaces), the risk of flooding, whether the location has a genuine choice, frequency and reliability of sustainable passenger transport modes, along with active travel opportunities, whether (where high volumes of freight transport will be required) sustainable freight transport options are available.

Further aspects of sustainability include any risk that the development will result in significant additional costs to the public purse (such as addressing the cost of mental and physical healthcare needs due to increased air, noise, light, vibration, dust and water pollution) and that the location will not increase risks for the public or place a higher burden of risk on citizens (an appropriate buffer should be established to separate residential homes from hazardous businesses, for example).

With the above in mind, we would like to see an explicit definition of sustainable development included in the glossary. Please see our proposed definition in this document https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2026/01/260113-sustainable-development-definition.pdf

There is not a question related to S1 but whilst footnote 7 appears to have been replaced by footnote 23 in S1, this footnote has been diluted from the previous version (removing the reference to previous paragraph 194, and to previous footnote 75). Footnote 23 should be moved to the substantive text (as per the intention set out on page 13 of the guidance to this consultation) and should include reference to the omitted items.

In addition, S1 relates to Positive plan-making, whereas footnote 7 previously related to decision-taking. It must be clear that this protection relates to both plan making and decision-taking.

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.

Partly Disagree.

Paragraph 2 (a(i), a(ii), and b) of S4 should be deleted altogether as it adds confusion and complexity, and reduces clarity. Paragraph 1 of S4 stands alone and points to the decision making policies in the NPPF, and that is all that is required. Complexity leads to legal battles.

The national decision-making policies in this Framework need to be updated to ensure that the health and wellbeing of existing communities are not impacted by proposed developments (such as introducing a requirement for a minimum 500m buffer between residential homes and mega warehouses, for example). See our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.

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.

Very strongly disagree.

The countryside, farmland and nature within it require protection. S5 risks opening the floodgates to development in the countryside.

The starting presumption for all of the uses in 1 a, b, e and j should be that they are unsustainable and harmful and that LPAs/developers must prove otherwise.

The wording in S5, 1: "*These should be approved*" should be deleted. There should be a development hierarchy, whereby proposals on brownfield, including farms, and for conversions should be encouraged and whereby applicants must demonstrate that they have been unable to find a suitable brownfield or conversion opportunity.

Should such inappropriate development be permitted, it should be required to meet Golden Rules similar to those set out at GB8 and policies related to the protection and enhancement of nature, the environment and the climate must be considered to wield the same substantial weight as economic growth.

Any major development for storage and distribution purposes must have access to sustainable freight transport options.

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.

Strongly disagree

All such development should be required to meet Golden Rules similar to those set out in GB8 and policies related to the protection and enhancement of nature, the environment and the climate must be considered to wield the same substantial weight as economic growth.

The wording in S5, 1: "*These should be approved*" should be deleted. The starting presumption for all of the uses in 1 a, b, e and j should be that they are unsustainable and harmful and that LPAs/developers must prove otherwise.

There should be a development hierarchy, whereby proposals on brownfield, including farms, and for conversions should be encouraged and whereby applicants must demonstrate that they have been unable to find a suitable brownfield or conversion opportunity.

Any major development for storage and distribution purposes must have access to sustainable freight transport options.

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.

Strongly Disagree.

As the Government has not published the specific TTWAs it wishes to see used, nor the stations which it considers meet the new rules, we are likely to see legal wrangles and delays due to the uncertainty that this policy brings.

It is correct to exclude certain areas and certain stations. We believe that the TTWA rule still risks unsuitable and unsustainable development. For example, if there is a rural station at the far reaches of TTWA with the minimum required number of services of trains per hour but no other public transport of active travel access, it is likely that this is a commuter station with no prospect of being a sustainable travel hub for the new residents.

Research by the RTPI in 2015 found the following: "*By using travel-to-work data from the 2011 Census, the Royal Town Planning Institute (RTPI) has found that building one million homes around railway stations in the Metropolitan green belt could result in between 3.96 and 7.45 million additional car journeys per week on roads which are already struggling with congestion and delays*" (https://www.rtpi.org.uk/media/vthh4pbi/buildinggreenbelt-commutingpatterns2015.pdf).

The station policy may well conflict with CC2: *"1a. Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4"*

A station surrounded by countryside and best quality farmland, should not be a development focus area. The definition therefore needs further tightening to exclude remote rural stations.

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

Strongly Agree

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.

Partly agree.

The policies are sensible, but they are rendered meaningless because sustainable development is not enforced. This would mean ensuring LPAs are obliged, and supported, to take the most climate friendly approach to development: greenfield last. Brownfield sites, empty home renovation, commercial and public conversions, high density - all need to be mandatory before greenfield sites are allocated.

If there is to be a genuine attempt to contribute to radical reductions in greenhouse gas emissions, sustainable passenger and freight transport must be mandated to enable this, rather than the continued focus on car/HGV-dependent development. What constitutes a 'radical reduction' must be defined.

It is the most vulnerable in our society who will be most impacted by extreme weather and long-term climate trends. The government should reduce bias and inequity in the planning system and make it possible for communities to appeal approved planning applications which do not comply with development plan policy, including NPPF requirements. Whilst affluent communities can take a judicial review in such circumstances, those who are choosing whether to heat or eat cannot.

The NPPF should mandate that irreplaceable habitats and land which can support nature-based solutions are fully protected. As an example, proposals should not be accepted on deep peat which Natural England considers to be irreplaceable and restorable.

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.

The policies are sensible, but they are rendered meaningless because sustainable development is not enforced. This would mean ensuring LPAs are obliged, and supported, to take the most climate friendly approach to development: greenfield last. Brownfield sites, empty home renovation, commercial and public conversions, high density - all need to be mandatory before greenfield sites are allocated.

Sustainable passenger and freight transport must also be mandated rather than the continued focus on car/HGV-dependent development.

It is the most vulnerable in our society who will be most impacted by extreme weather and long-term climate trends. The government should reduce bias and inequity in the planning system and make it possible for communities to appeal approved planning applications which do not comply with development plan policy, including NPPF requirements. Whilst affluent communities can take a judicial review in such circumstances, those who are choosing whether to heat or eat cannot.

The NPPF should mandate that irreplaceable habitats and land which can support nature-based solutions are fully protected. As an example, proposals should not be accepted on deep peat which Natural England considers to be irreplaceable and restorable.

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?

Partly agree.

Citizens who are affected by the consequences of development (such as increased risk of flooding) should have the ability to request a stop notice (which must be adhered to) and/or compensation should the risk materialise.

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

There must be consideration of the water requirements should the risk of wildfire materialise. Such incidents are typically in remote locations and development must not increase the risks or put a higher burden on local communities (toxic smoke, increased air pollution, etc).

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

Guidance on the cumulative impact of development in areas which are at risk of wildfires should be made available to both communities and developers.

There must be consideration of the water requirements should the risk of wildfire materialise. Such incidents are typically in remote locations and development must not increase the risks or put a higher burden on local communities (toxic smoke, increased air pollution, etc).

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

LPAs must be obliged to and supported to take the most climate friendly approach to development: greenfield last. Brownfield sites, empty home renovation, commercial and public conversions, high density all need to be mandatory before greenfield sites are allocated.

Car/HGV-dependent developments, unlocked by new roads, must not be allocated or given planning permission. Sustainable passenger and freight transport must be mandated.

Planning guidance should be clear that best and most versatile farmland is needed for food security as the climate becomes more volatile. Given the amount of suitable, available and achievable brownfield land, along with roofs/car parks for solar, bmv sites should not be developed.

It is the most vulnerable in our society who will be most impacted by extreme weather and long-term climate trends. The government should reduce bias and inequity in the planning system and make it possible for communities to appeal approved planning applications which do not comply with development plan policy, including NPPF requirements. Whilst affluent communities can take a judicial review in such circumstances, those who are choosing whether to heat or eat cannot.

The NPPF should mandate that irreplaceable habitats and land which can support nature-based solutions are fully protected. As an example, proposals should not be accepted on deep peat which Natural England considers to be irreplaceable and restorable.

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.

Strongly disagree.

Top down housing targets for the private sector to meet do not solve the housing crisis and do see our countryside concreted over and habitats destroyed. The private sector has planning approvals for over 1m homes that have not been built which demonstrates that a developer-led system does not address housing for those in acute need.

Private developers base their decisions on their profits and margins, not on government targets and, whilst those who can afford to buy a home may not be able to purchase a house in the exact location they wish to live, this is not a crisis.

A crisis is not having a safe, secure, affordable roof over your head. Addressing this should be the government's first priority. There must be a social housing target, based on LPA waiting list data, and funding from the government to enable social housing to be built.

There must also be robust policy requirements to prioritise brownfield land, empty homes and commercial/public conversions, and the associated funding/incentives from the government to enable delivery on such sites.

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?

Strongly Agree

A Strategic Housing Market Assessment does this job, but it is a waste of public sector resources if the LPA is forced to allocate numbers to meet government targets, instead of creating a plan which meets local needs as set out in a SHMA.

Obligatory market housing targets cause the problems, and do not solve the housing crisis. There must be a social housing target, based on LPA waiting list data, and funding from the Government to enable social housing to be built.

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.

Neither agree nor disagree

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?

Neither agree nor disagree

Traveller sites should be planned for and provided in accordance with need and sites should be agreed in consultation with local communities and specialist organisations which provide advice to gypsies, travellers and showpeople.

An annually updated baseline of existing traveller sites should be recorded and monitored at a national level.

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.

Strongly Disagree

Annex D should be amended as it is responsible for perpetuating the housing crisis, keeping people on the waiting list for many years, and fuelling the destruction of countryside, farmland and habitats.

LPAs should be monitored on their ability to house their communities in safe, secure and affordable homes, not on whether there is a 5 year supply of land for market housing. Land availability should be assessed in accordance with the outcome of the Strategic Housing and Employment Market Assessments.

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.

Strongly Disagree

Annex D should be amended as it is responsible for perpetuating the housing crisis, keeping people on the waiting list for many years, and fuelling the destruction of countryside, farmland and habitats.

LPAs should be monitored on their ability to house their communities in safe, secure and affordable homes, not on whether there is a 5 year supply of land for market housing. Land availability should be assessed in accordance with the outcome of the Strategic Housing and Employment Market Assessments.

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 Disagree

Traveller sites should be planned for and provided in accordance with need and sites should be agreed in consultation with local communities and specialist organisations which provide advice to gypsies, travellers and showpeople.

An annually updated baseline of existing traveller sites should be recorded and monitored at a national level.

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.

Strongly disagree.

Greenfield last must be mandatory. Brownfield sites, empty home renovation, commercial and public conversions, high density all need to be mandatory before greenfield sites are allocated.

All sites must be assessed to determine whether they comply with a clear definition of what constitutes sustainable development. Please see our proposed definition in this document https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2026/01/260113-sustainable-development-definition.pdf

The government must provide explicit approval of any unsustainable development that does not comply with the definition of sustainable development or other policies in this plan.

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.

Strongly Disagree.

Firstly, the definition of Designated Rural Areas is immaterial to support for social and affordable housing. What is needed is a social housing target for each district, based on LPA waiting list data, and funding from the Government to enable social housing to be built.

Secondly, the definition of Affordable Housing should be limited to genuinely affordable homes, social housing.

What is called ‘affordable’ housing to buy is typically not affordable - a 20% discount on a market home costing £500,000 means that the purchase price would be £400,000. A 20% discount on a rental of £1,500 per month would still be £1,200 per month. Neither figure would be considered ‘affordable’ by many citizens (including the most vulnerable in our society). Such properties should be described as ‘discounted’ homes, not Affordable Housing.

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.

Neither agree nor 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?

Neither agree nor disagree

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.

Neither agree nor disagree

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?

Neither agree nor disagree

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

Strongly Disagree.

LPAs should be allocating suitable sites, not constrained and forced into arbitrary restrictions. Furthermore, if the government is serious about supporting SME developers, the percentage of smaller sites would be significantly higher.

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

Yes, remove this latter part *"(including the extent to which there is a five year supply of deliverable housing and traveller sites, and performance against the Housing Delivery Test)."*

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.

Neither agree nor disagree

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.

This may better enable developments providing affordable housing if, as stated, the developer, "meet[s] or exceed[s] relevant development plan requirements for affordable housing"

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?

Strongly Disagree.

It's a good idea in theory, but it is funding that is preventing the delivery of social rent properties and that is what the government needs to provide.

To support the delivery of a greater number of social rent homes, there must be a social housing target, based on LPA waiting list data, and funding from the government to enable that social housing to be built. The £39bn promised covers years beyond this Parliament, is only £4bn a year, when £12bn a year is needed, and is currently less than provided under the previous Government.

In addition, the definition of Affordable Housing should be limited to genuinely affordable homes, social housing.

What is called 'affordable' housing to buy is typically not affordable - a 20% discount on a market home costing £500,000 means that the purchase price would be £400,000. A 20% discount on a rental of £1,500 per month would still be £1,200 per month. Neither figure would be considered 'affordable' by many citizens (including the most vulnerable in our society). Such properties should be described as 'discounted' homes, not Affordable Housing.

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?

Affordable temporary accommodation should be provided for within planning policy and needs should be assessed along with other housing requirements. Space standards should not restrict the provision of temporary accommodation. Far better a small but safe, secure and affordable temporary home than no home because it is considered too small.

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.
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

Partly agree.

We are concerned that a cash contribution in lieu of provision for affordable homes (in any size of development) will negatively impact the objective of creating mixed and balanced communities. Cash contributions should not be permitted in lieu of 'affordable' housing on land released from the Green Belt (or on land outside settlements).

If a cash contribution is accepted for other developments, it must be sufficient to cover the full costs of provision of genuinely affordable homes and part of the site must be set aside for their provision by, for example, a registered provider of social housing.

Cash should be paid via a non-negotiable, CIL-type system, whereby developers pay a non-negotiable fixed sum per dwelling.

In addition, to reduce misunderstandings about what will be delivered, the definition of Affordable Housing should be limited to genuinely affordable homes, social housing.

What is called 'affordable' housing to buy is typically not affordable - a 20% discount on a market home costing £500,000 means that the purchase price would be £400,000. A 20% discount on a rental of £1,500 per month would still be £1,200 per month. Neither figure would be considered 'affordable' by many citizens (including the most vulnerable in our society). Such properties should be described as 'discounted' homes, not Affordable Housing.

It would not be appropriate for a cash contribution to be provided in lieu of 'discounted' housing to buy or rent.

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).

Risks are that Housing Associations in receipt of the funds would not build new social housing but would use the funds to maintain their existing stock, given the repair and safety bills they are facing. Developer contributions should be ring-fenced for new properties.

Another risk is that the objective of creating mixed and balanced communities is not met.

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.

No comment.

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.

A standard CIL system for affordable housing and infrastructure would avoid this problem.

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.

Strongly Agree

72) Do you agree the 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

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.

Partly Agree

Supporting evidence must also show how the development will provide a safe and secure environment for neighbours of the scheme(s).

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

Supporting evidence must also show how the development will mitigate any impact on neighbours of the scheme(s).

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 Disagree.

The planning system is supposed to be plan-led and should not explicitly cater for, or justify, exceptions. Rural exception sites that meet the criteria in the definition are highly unlikely to come forward because landowners will not be incentivised to support them. The government needs to fund social housing and stop pretending the private sector will solve the housing crisis.

Meanwhile, the addition of 'traveller' sites to the definition and the policy risks pepper-potting the countryside with inappropriate, unsustainable traveller sites if landowners in those communities purchase land and put locations forward as 'exception' sites. All references to 'Traveller sites' should be deleted from the policy and the definition.

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.

Strongly Agree

As the planning system is supposed to be plan-led and should not explicitly cater for, or justify, exceptions, we believe the whole policy should be removed as it provides justification and process for speculative development, particularly in the countryside.

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?

Strongly Disagree.

Landowners are not incentivised to bring forward rural exception sites, even at a benchmark value. The government needs to fund social housing (or almshouses) instead of pretending that policies like this can solve the housing crisis.

Meanwhile, the addition of 'traveller' sites to the definition and the policy risks pepper-potting the countryside with inappropriate, unsustainable traveller sites if landowners in those communities purchase land and put locations forward as 'exception' sites. All references to 'Traveller sites' should be deleted from the policy and the definition.

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.

Partly Disagree.

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

Typically the travelling communities (gypsies, travellers and showpeople) have culturally had a nomadic or mobile lifestyle, so a policy which suggests a "*a settled base that limits the need for long-distance travelling*" may not meet the needs of this community.

Traveller sites should be planned for and provided in accordance with need and sites should be agreed and allocated via a local plan, in consultation with local communities and specialist organisations which provide advice to gypsies, travellers and showpeople.

An annually updated baseline of existing traveller sites should be recorded and monitored at a national level.

Traveller sites should not be included in the rural exception sites policy.

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.

Strongly Disagree.

This policy is far too vague and woolly to be meaningful or effective. Penalties should be highlighted, such as permissions being removed or sites de-allocated from a local plan if they are not (properly) started by a pre-agreed date. Breaking the ground cannot be considered acceptable in terms of demonstration that construction has begun.

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

The flexibility in the approach should not compromise the need to deliver sustainable development in all phases.

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.

Very large sites/new towns need a very strategic, project planning approach, and developers/masterplanners must demonstrate that they can deliver infrastructure, services and affordable housing at key milestones, and much of it **BEFORE** housing or employment sites. All phases of the scheme must demonstrate sustainable development.

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

LPAs should only be held responsible for what they can control (which is not the delivery of development). The Rule Book should confirm that the HDT calculation includes sites that have been approved but not delivered, along with empty homes/commercial conversions for which there is a strategy to bring back into use. LPAs should also be encouraged to include Windfall sites as these can be significant, particularly given the huge levels of speculative development following the government's introduction of Grey Belt policies.

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.

Strongly disagree.

There is too much emphasis on one element of sustainable planning here (economic growth). E1 must reinforce the section on the Purpose of Planning, paragraph 14 ("*The purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest"*), 15, 16 and 17, to ensure planning balance.

The text at 1b (relating to inadequate infrastructure, services or housing, or a poor environment) needs to be strengthened. Commercial development cannot be considered to be sustainable if these aspects are 'inadequate'.

The text at 1c needs to include reference to appropriate selection of sites. As set out in our recent report (https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf), it cannot be considered sustainable to meet these needs within 500m of residential housing.

A new policy criterion (1c iv) should be added to reflect a genuine objective to 'grow' the rural economy. This would mean allocating and explicitly protecting land (including best and most versatile) for food production, woodland planting and other ecosystem services.

Criterion 2 must include reference to the impact on local communities. Development should not be approved if the effect on existing residents (including on their financial, mental and physical health) will be substantial.

The policy must also emphasise brownfield-first (greenfield last) aspirations to protect best and most versatile agricultural land and other environmentally/ecologically rich sites, including sites which are essential to growing the rural economy.

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.

Strongly disagree.

There are no caveats about harms to communities or the environment and farmland. These need to be built into E2.

A new criterion must be added to ensure substantial weight is given to the key recommendations in our recent report (https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf), including, for example:

- Closing any loopholes in the planning system (such as a developer's right to use an approval from 70 years previously, exploiting the planning regulations at that time, without requiring compliance with current policies)
- Only allowing unduly dominant buildings in close proximity to residential properties to be approved in wholly exceptional circumstances that have been tested by the Planning Inspectorate (with 'close proximity' being defined as closer than 500m from the nearest residential property)
- Only allowing 24 x 7 operations in close proximity to residential properties to be approved in wholly exceptional circumstances that have been tested by the Planning Inspectorate (with 'close proximity' being defined as closer than 500m from the nearest residential property)
- Requiring detailed environmental assessments to be carried out for all B8 developments, including a comprehensive, lifetime assessment of expected (air, noise, light, vibration, dust and water) pollutants (and carbon emissions) and how they will be mitigated (mitigation could refer to BREEAM standards, penalties for significant impacts on surrounding communities, stricter conditions to deal with toxins, other pollutants and any increased risk of flooding, effective landscape screening, a community right to request a stop notice (which must be adhered to) if there are concerns about human or wildlife health and wellbeing).

Policy criteria must be consistent with those imposed on residential extensions, for example, requiring that all such developments "*Maintain acceptable living standards for current and new occupiers in terms of access to daylight, sunlight, privacy and external amenity space*".

The policy must also emphasise brownfield-first (greenfield last) aspirations to protect best and most versatile agricultural land and other environmentally/ecologically rich sites.

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.

Strongly disagree.

There are no caveats about harms to communities or the environment and farmland. These need to be built into E3.

Criterion 1b must be strengthened to bring it into line with the expectations of residential extensions, including that such developments must "*Maintain acceptable living standards for current and new occupiers in terms of access to daylight, sunlight, privacy and external amenity space*".

A new criterion must be added to ensure substantial weight is given to the key recommendations in our recent report (https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf), including, for example, requiring any B8 developments that would result in a cumulative total of more than 1,000 HGV movements a day on a specific road to be supported by sustainable freight transport options. Policy must be strengthened, including:

- Closing any loopholes in the planning system (such as a developer's right to use an approval from 70 years previously, exploiting the planning regulations at that time, without requiring compliance with current policies)
- Only allowing unduly dominant buildings in close proximity to residential properties to be approved in wholly exceptional circumstances that have been tested by the Planning Inspectorate (with 'close proximity' being defined as closer than 500m from the nearest residential property)
- Only allowing 24 x 7 operations in close proximity to residential properties to be approved in wholly exceptional circumstances that have been tested by the Planning Inspectorate (with 'close proximity' being defined as closer than 500m from the nearest residential property)
- Requiring detailed environmental assessments to be carried out for all B8 developments, including a comprehensive, lifetime assessment of expected (air, noise, light, vibration, dust and water) pollutants (and carbon emissions) and how they will be mitigated (mitigation could refer to BREEAM standards, penalties for significant impacts on surrounding communities, stricter conditions to deal with toxins, other pollutants and any increased risk of flooding, effective landscape screening, a community right to request a stop notice (which must be adhered to) if there are concerns about human or wildlife health and wellbeing).

Policy criteria must be consistent with those imposed on residential extensions, for example, requiring that all such developments "*Maintain acceptable living standards for current and new occupiers in terms of access to daylight, sunlight, privacy and external amenity space*".

The policy must also emphasise brownfield-first (greenfield last) aspirations to protect best and most versatile agricultural land and other environmentally/ecologically rich sites.

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.

Strongly disagree.

E4 duplicates the previous section on development outside of settlements (S5: Principle of Development Outside Settlements). It should therefore be significantly amended to avoid confusion. The requirement to focus on brownfield and the reuse of existing buildings should be transferred to S5.

The existing policy criteria should be fully deleted.

A new policy criterion should be added to reflect a genuine objective to 'grow' the rural economy in alignment with policy E1. This would mean allocating and explicitly protecting land (including best and most versatile) for food production, woodland planting and other ecosystem services.

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.

Strongly Agree

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?

Strongly Agree

90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

No comment

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.

No comment

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.

No comment

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.

Strongly Disagree -

These infrastructure requirements can have a huge impact on local communities and landscapes (particularly landscapes in protected areas). Policy should explicitly ensure that there should be no increases in height limits or reductions in planning safeguards in protected areas. On other sites, the regulations should confirm that any structure that is proposed to be more than 15m in height should be located at least 500m from the nearest residential property.

With this in mind, Policy CO1 criterion 2 should be explicitly updated to require such developments to be sited a minimum of 500m from residential properties.

In addition, there are currently no restrictions within permitted development rules that limit development on irreplaceable habitats. Policy must explicitly confirm that it would be inappropriate for development such as this to be located on sites that are considered irreplaceable.

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.

Strongly Disagree

Why is consideration only being given to 'applicants and local planning authorities', these developments can have a huge impact on local communities and landscapes (particularly landscapes in protected areas).

Policy should explicitly ensure that there should be no increases in height limits or reductions in planning safeguards in protected areas. On other sites, the regulations should confirm that any structure that is proposed to be more than 15m in height should be located at least 500m from the nearest residential property.

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.

Strongly Disagree - Policy CO2 criterion 1a should require pre-submission consultation with impacted local residents as well as representatives from local organisations.

In addition, advice should be sought from the HSE where such equipment is to be installed in COMAH zones.

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 Disagree.

There is nothing in this policy which sets out a requirement for solar on every rooftop, including warehouses and offices, and sites such as car parks, this must be mandatory in local plans. Likewise, local scale wind power in industrial and commercial parks, and willing communities, must be incorporated into a plan. There must be a greenfield LAST mandate in W1.

The policy must also emphasise the need for such development to be sustainable. It cannot be considered sustainable to construct such schemes on irreplaceable habitats, for example.

Early engagement must also be held with impacted communities, so there is a clear understanding of how those communities will genuinely benefit from the scheme.'

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 Disagree.

There is nothing in this policy which sets out a requirement for solar on every rooftop, including warehouses and offices, and sites such as car parks, this must be mandatory in local plans. Likewise, local scale wind power in industrial and commercial parks, and willing communities, must be incorporated into a plan. There must be a greenfield LAST mandate in W2.

The policy must also emphasise the need for such development to be sustainable. It cannot be considered sustainable to construct such schemes on irreplaceable habitats, for example.

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 Disagree. There is nothing in this policy which sets out a requirement for solar on every rooftop, including warehouses and offices, and sites such as car parks, this must be mandatory in local plans. Likewise, local scale wind power in industrial and commercial parks, and willing communities, must be incorporated into a plan. There must be a greenfield LAST mandate in W3.

The policy must also emphasise the need for such development to be sustainable. It cannot be considered sustainable to construct such schemes on irreplaceable habitats, for example, or in or adjacent to COMAH Zones where the high risk of fire in some developments could have a catastrophic impact if the risk materialises (including from ricochet effects).

Policy criterion 2 must be changed. Applicants **MUST** be required to demonstrate the need for such developments, especially given the reported huge oversupply of, for example, Battery Energy Storage Systems (BESS). These schemes must not be approved if there is evidence that the grid has no capacity to connect them (https://www.cornwall-insight.com/press-and-media/press-release/battery-storage-connection-queue-double-the-grids-requirement-for-2030/).

BESS in rural locations may also result in challenges for the Fire Service and others should the acknowledged risk of fire materialise, including in relation to available water supply and the potential spread to create a broader wildfire risk.

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

The policy must also emphasise the need for such development to be sustainable.

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.

Partly Agree

As peat is mentioned in this policy, substantial weight should be given to protecting restorable peat. Criterion 5 should be strengthened to secure a complete moratorium on development on peat where Natural England considers the area to be a deep peat irreplaceable habitat that is restorable. Developments on peatland will require the peat to either be extracted or piled, both of which will result in a huge carbon emissions event and will prevent future restoration.

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.

No comment

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.

Strongly Disagree

It is likely that this definition will lead to a presumption in favour of mineral extraction even if the result harms the environment, communities, heritage and farmland.

Furthermore, as reference to peat is included within this chapter, peat should be included in any list of critical and growth minerals.

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.

Partly Agree

As peat is mentioned in this chapter, safeguarding it through planning should be mentioned in policy M2. Substantial weight should be given to protecting restorable peat. A new criterion should be added to secure a complete moratorium on development on peat where Natural England considers the area to be a deep peat irreplaceable habitat that is restorable. Developments on peatland will require the peat to either be extracted or piled, both of which will result in a huge carbon emissions event and will prevent future restoration.

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.

Strongly Disagree

It is likely that this will lead to a presumption in favour of their extraction even if the result harms the environment, communities, heritage and farmland.

Furthermore, as reference to peat is included within this chapter, peat should be included in any list of critical and growth minerals.

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.

No comment

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

No comment

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.

Strongly disagree.

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

This policy wording is far too broad, perfunctory and arguable by lawyers. A great deal more detail is needed - see some of the excellent country Minerals Plans, or insist, in the NPPF that a detailed Minerals Plan is produced.

Furthermore, as peat is mentioned in this chapter, substantial weight should be given to protecting restorable peat. A new criterion should be added to secure a complete moratorium on development on peat where Natural England considers the area to be a deep peat irreplaceable habitat that is restorable. Developments on peatland will require the peat to either be extracted or piled, both of which will result in a huge carbon emissions event and will prevent future restoration.

109) Do you agree with the 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.

No comment on the approach to coal, oil and gas in M5 but substantial weight should be given to protecting restorable peat. M5, criterion 1 should be strengthened to secure a complete moratorium on development on peat where Natural England considers the area to be a deep peat irreplaceable habitat that is restorable. Developments on peatland will require the peat to either be extracted or piled, both of which will result in a huge carbon emissions event and will prevent future restoration.

110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No

No

111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.

No comment

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.

No comment on the issue raised in the question, however, as peat is mentioned in this chapter, substantial weight should be given to protecting restorable peat. A new criterion should be added to secure a complete moratorium on development on peat where Natural England considers the area to be a deep peat irreplaceable habitat that is restorable. Developments on peatland will require the peat to either be extracted or piled, both of which will result in a huge carbon emissions event and will prevent future restoration.

Another new criterion should also be added to M6 which requires the reporting and monitoring of any sinkholes that appear during development. A national record should be kept of all sinkholes and the reason for their occurrence.

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.

No comment

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.

Partly agree.

There should be a strong greenfield last presumption, with robust testing of the brownfield policies/Brownfield Land Registers, Empty Homes policies, Commercial Conversion policies. No greenfield should be built on until the above policies have been implemented. Unbuilt local plan allocations should be revoked after three years. Density standards must be across the board, including on edge of town sites. There is no reason to allow low density, car-dependent, land-grabbing sprawl. High density brings community benefits, walkability, critical mass for services and transport. Every new development should have a density of 100dph.

115) If not, what further guidance is needed?

There should be a strong greenfield last presumption, with robust testing of the brownfield policies/Brownfield Land Registers, Empty Homes policies, Commercial Conversion policies. No greenfield should be built on until the above policies have been implemented. Unbuilt local plan allocations should be revoked after three years. Density standards must be across the board, including on edge of town sites. There is no reason to allow low density, car-dependent, land-grabbing sprawl. High density brings community benefits, walkability, critical mass for services and transport. Every new development should have a density of 100dph.

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 but there must be a strong greenfield last presumption - a hierarchy in which greenfield is only allowed once brownfield, empties, commercial conversions are exhausted, and existing planning permissions built out.

Criterion 3 should be amended to confirm the policy expectations about making effective use of greenfield land to meet the needs of future food security, climate mitigation, nature's recovery and other ecosystem services benefits (including community access to green spaces).

117) Do you agree that 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

Criterion 3 should be amended to confirm the policy expectations about making effective use of greenfield land to meet the needs of future food security, climate mitigation, nature's recovery and other ecosystem services benefits (including community access to green spaces).

118) Do you agree the high-level design principles provided in policy L2(d) are 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.

No comment

119) Do you agree that 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.

No comment

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.

Partly Agree

The policy should emphasise the need for access to green spaces, especially where density is being increased.

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 Disagree

While a good start, the densities are far too low. An urban site can easily absorb 100dph or more. There is no reason why all sites should not target very high densities.

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.
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

Partly Disagree

While a good start, the densities are far too low. An urban site can easily absorb 100dph or more. There is no reason why all sites should not target very high densities.

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

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.

Strongly Disagree.

As the government has not published the specific TTWA dataset or year it wishes to see used, nor the stations which it considers meet the new rules, we are likely to see legal wrangles and delays due to the uncertainty that this policy brings. We are already reliant on interpretations by consultancies such as Lichfields. It is imperative that the relevant dataset is published and clearly indicated to be relevant for this policy.

It is correct to exclude certain areas and certain stations. We believe that the TTWA rule still risks unsuitable and unsustainable development. If there is a rural station at the far reaches of TTWA with the minimum required number of services of trains per hour but no other public transport of active travel access, for example, it is likely that this is a commuter station with no prospect of being a sustainable travel hub for the new residents. The station is likely to be surrounded by countryside and best quality farmland, which should not be built on. The definition therefore needs further tightening to exclude remote rural stations.

Research by the RTPI in 2015 found the following: "*By using travel-to-work data from the 2011 Census, the Royal Town Planning Institute (RTPI) has found that building one million homes around railway stations in the Metropolitan green belt could result in between 3.96 and 7.45 million additional car journeys per week on roads which are already struggling with congestion and delays*" (https://www.rtpi.org.uk/media/vthh4pbi/buildinggreenbelt-commutingpatterns2015.pdf).

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?

Yes

Density standards should be presumed high in every development, and a developer should have to demonstrate why the site cannot be high density - but there should be no reason why not. Developers will prefer to build detached, large houses, but the benefits to the community as a whole come from high density (critical mass for services and transport, community spirit and walkability).

High density is considered to be 100dph.

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

Density standards should be presumed high in every development, and a developer should have to demonstrate why the site cannot be high density - but there should be no reason why not. Developers will prefer to build detached, large houses, but the benefits to the community as a whole come from high density (critical mass for services and transport, community spirit and walkability).

High density is considered to be 100dph.

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

Density standards should be presumed high (100dph) in every development, and a developer should have to demonstrate why the site cannot be high density - but there should be no reason why not. Developers will prefer to build detached, large houses, but the benefits to the community as a whole come from high density (critical mass for services and transport, community spirit and walkability).

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.

No comment

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

No comment

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.

Strongly Agree

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

No comment

132) Do you agree that 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.

Strongly Disagree

Green Belts are at too great a risk from the Grey Belt policies, and therefore all other protective policies are rendered meaningless. The Grey Belt has been marketed as ugly land and disused petrol stations but is in fact countryside and farmland around villages, and unsustainable developments are the result. See our Grey Belt report: https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251024_greying_the_greenbelt_oct25.pdf.

Criterion 3 should be extended to confirm that, once identified within the Green Belt Assessment, and validated through the plan examination, no additional Grey Belt sites will be considered for development.

The Grey Belt element of the Green Belt assessment should explicitly identify whether the land considered to be Grey Belt has been previously developed (petrol stations and car parks as per the government's rhetoric) or whether it is greenfield land with natural capital value.

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 Disagree.

Not in rural areas where development will never be sustainable because the majority of new journeys will be made by car, and countryside/farmland will be at risk.

Not in Green Belt, already at risk: Green Belts are at too great a risk from the Grey Belt policies, and therefore all other protective policies are rendered meaningless. The Grey Belt has been marketed as ugly land and disused petrol stations but is in fact countryside and farmland around villages, and unsustainable developments are the result. See our Grey Belt report: https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251024_greying_the_greenbelt_oct25.pdf.

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.

Partly Agree.

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

Green Belts are at too great a risk from the Grey Belt policies, and therefore all other protective policies are rendered meaningless. The Grey Belt has been marketed as ugly land and disused petrol stations but is in fact countryside and farmland around villages, and unsustainable developments are the result. See our Grey Belt report: https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251024_greying_the_greenbelt_oct25.pdf.

Grey belt policies should be reversed to enshrine Green Belt protection in planning policy.

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.

Partly Agree

The endurance of our Green Belt is being undermined (and, in some cases, destroyed) due to the Grey Belt policy, which must be reversed to enshrine Green Belt protection in planning policy.

See our Grey Belt report: https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251024_greying_the_greenbelt_oct25.pdf.

Policy GB6, criterion 3, must be amended to require evidence that the very special circumstances related to the wider environmental benefits associated with increased production of energy from renewable sources exist (locating such schemes on former Green Belt land that is very deep peat, for example, will not result in those 'wider environmental benefits', as set out in this example https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2025/08/250516-trafford-approves-bess.jpg).

Furthermore, these policies must be strengthened to ensure **ALL** developments in the Green Belt (or former Green Belt) are genuinely sustainable and do not become car/HGV-dependent sprawl, including when they are located near to a railway station.

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.

Strongly disagree.

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

We very strongly disagree when the Green Belt (or former Green Belt) is countryside or farmland. The Green Belt should be retained as open space, enhancing the countryside and farmland and contributing to the rural economy. This policy directly removes Green Belt for development and reduces the openness and purposes of the Green Belt.

This policy must be strengthened to ensure **ALL** developments in the Green Belt (or former Green Belt) are genuinely sustainable and do not become car/HGV-dependent sprawl, including when they are located near to a railway station.

Furthermore, policy should be explicit that, to reflect "*the manifesto commitment to ensure any new development on Green Belt land benefits communities*", any employment development on Green Belt, former Green Belt land and/or Grey Belt, must predominantly provide a substantial number of local jobs.

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.

Strongly disagree.

There is every possibility that land promoters and developers have applied for Grey Belt planning permission using the Golden Rules knowing full well that these policies are undeliverable and that a housebuilder would have to renegotiate later. There must be no renegotiation of the Golden Rules. A housebuilder must carry out robust financial planning with contingencies or cost insurance. If development on Green Belt land, Grey Belt (or former Green Belt land) is unviable when the Golden Rules are followed, schemes should not be approved.

Furthermore, footnote 53 should be amended. These Golden Rules should apply to all Green Belt, including former Green Belt, and all Grey Belt planning applications (including plans or planning applications approved before 12 December 2024, where development has not yet commenced), to ensure the public is genuinely compensated for the loss of Green Belt land and that premature planning applications have not been submitted to avoid compliance these rules.

Policy should be explicit that, to reflect "*the manifesto commitment to ensure any new development on Green Belt land benefits communities*", any employment development on Green Belt, former Green Belt land and/or Grey Belt, must predominantly provide a substantial number of local jobs.

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?

The policy should make it clear that there should be no renegotiations in relation to the Golden Rules, therefore, no viability assessments will be needed. If development on Green Belt land, Grey Belt (or former Green Belt land) is unviable when the Golden Rules are followed, schemes should not be approved.

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.

Strongly Disagree.

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

There should be no viability assessments. If a proposal is not Golden Rule compliant, it should not be given the go ahead and if it is no longer viable, the permission should lapse.

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.

Strongly Disagree. There is no standardisation in land values or benchmark values.

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?

Standardisation is difficult for land values.

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 disagree.

The stated purpose of this change is that the previous wording gave Green Belt too much protection, yet already the Grey Belt rules have resulted in significant harm to the Green Belt.

Green Belts are at too great a risk from the Grey Belt policies, and therefore all other protective policies are rendered meaningless. The Grey Belt has been marketed as ugly land and disused petrol stations but is in fact countryside and farmland around villages, and unsustainable developments are the result. See our Grey Belt report: https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251024_greying_the_greenbelt_oct25.pdf.

The Grey Belt definition should revert to the previous wording, which confirmed that "*'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development*". This would ensure that land that is identified as Grey Belt, is actually Grey Belt.

Whilst footnote 7 appears to have been replaced by footnote 23, this footnote has been diluted from the previous version (removing the reference to previous paragraph 194, and to previous footnote 75). Footnote 23 should be moved to the substantive text (as per the intention set out on page 13 of the guidance to this consultation) and should include reference to the omitted items.

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

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.

Strongly Agree

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.

Partly Agree

Criterion 1b (Liveability) should include reference to a requirement for a minimum 500m buffer between excessively large and dominant buildings and existing residential properties, this would include mega-warehouses (B8) - see our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.

Criterion 1e (Movement) should be amended to 'provide sustainable passenger and freight transport infrastructure' - the current wording will perpetrate the existing focus on new and extended road schemes, rather than prioritise investment in public transport and sustainable freight options.

Criterion 4 should be amended to include outstanding or innovative designs which help to reduce costs to the public purse, such as those that will result in reductions to air, noise, light, vibration, dust and water pollution or surface water flooding (which will all reduce the costs of NHS treatment for mental and physical health services), for example.

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?

Strongly Agree

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.

Partly agree.

The policy will help but will be overruled by:

1. The call for sites process, which puts allocation before strategy
2. The top-down, obligatory housing targets
3. A focus on greenfield sites, including in Green Belt and around rural stations
4. A developer mindset which prefers car-dependent, detached estates

The policy will also be rendered impotent by the lack of focus nationally on genuinely sustainable passenger and freight transport and the continued prioritisation of public funds on new and extended road schemes.

Criterion 1b should be amended to 'where it can support genuinely sustainable patterns of movement'. New and extended road schemes are not sustainable options and should only be approved by exception as they result in huge increases to air, noise, light, vibration, dust and water pollution (and carbon emissions).

A new criterion should be added to confirm that, where public money is invested in a scheme (including NSIPs), the public must benefit. We cannot continue with the situation where the public pays for infrastructure and the benefits go into shareholder pockets.

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

Parking standards are an important tool in the drive for modal change. Criterion 2 should, therefore, be strengthened to reinforce efforts to encourage the use of sustainable transport modes and reduce car use, particularly for shorter journeys.

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.

Criterion 1a must be amended as it currently provides a 'get out' clause allowing developers to propose unsustainable development. Where development proposals 'could generate a significant amount of movement' they must be mandated to deliver genuinely sustainable passenger and freight transport options. The caveat 'unless the nature of the use makes this impractical' must be removed.

Criterion 1c should be updated to acknowledge that motor vehicle traffic causes noise, light, vibration, dust and water pollution, in addition to air pollution. Detailed evidence that meets the principles of the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-servicesGOV.UK) must be publicly available to demonstrate that environmental impacts have been fully assessed and that appropriate avoidance, mitigation or compensation has been determined.

The principles in the Green Claims Code require that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

There is no justification for evidence documentation that does not meet these criteria.

The Connectivity Tool must undergo robust testing before becoming an accepted tool for determining sustainability. It does not cap walking distances, which would, according to urban design principles, cap them at 800m (not as the crow flies…). The Tool does not measure travel time, including waiting time, which is essential when analysing the likelihood that people will use public transport instead of their car. The tool throws up anomalies, such as sites nearly 3km from a station and with a twice a week bus service coming up as relatively well-connected, and it does not work well in rural areas. The weight of evidence from communities who understand the local connectivity must be considered greater than the tool. The public must have full access to the tool to understand the basis on which decisions are being recommended or have been made.

TR3 must be edited and weighted to ensure that within-settlement development is preferred, for example brownfield, empty homes and commercial conversions.

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

In rural areas, the needs of horse riders should also be considered.

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.

Partly Agree

New facilities should not be considered appropriate development in the Green Belt.

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

Criterion 1 should include a new sub-criterion c which sets out the requirement for detailed evidence, that meets the principles of the Green Claims Code (https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-servicesGOV.UK), which will be publicly available to demonstrate that environmental impacts have been fully assessed and that appropriate avoidance, mitigation or compensation has been determined..

The principles in the Green Claims Code require that:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated

There is no justification for evidence documentation that does not meet these criteria.

Criterion 2 should be updated to confirm that transport assessments and statements, and travel plans must demonstrate how sustainable development will be achieved, if the location is not currently considered to be sustainable.

Criterion 3 should be updated to confirm that an 'unacceptable impact on highway safety' includes the likelihood of the number of personal injury accidents (PIAs) increasing due to the proposed development. This criterion should also confirm that new or extended road schemes (outside of the development itself) are not considered a sustainable form of movement. Modal shift and sustainable passenger and freight transport must be the priority to ensure achievement of sustainability and climate objectives.

Criterion 4 should be updated to confirm that data should clearly and separately demonstrate the impact from different categories of vehicles (ie cars, small vans, HGVs).

156) Do you agree the proposed text in policy TR7 provides 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.

Strongly Disagree

The policy is too vague for such complex developments. These might be better served by National Policy Statements.

Policy 1c should be totally removed. Given they are not sustainable developments, no new airfields should be proposed. The government should be promoting sustainable passenger and freight transport options via rail or water.

Policy 1d should be updated to reflect that environmental impacts also include light, vibration, dust and water pollution.

A new policy criterion 1e should be added to confirm that large developments (such as B8 mega warehouses) must be located at least 500m from the nearest residential property - see our recent report https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251201_cpa_report_besieged_by_b8_warehouses_dec25.pdf.

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

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.

Strongly Agree

Policy HC1 should include reference to the need for site selection to be based on the availability of, for example, available school places and GP/dental appointments, not just proximity to a building from which such services are delivered.

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.

Strongly Agree

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.

Partly Agree

Policy HC3, 1 should include reference to the need for site selection to be based on the availability of, for example, available school places and GP/dental appointments, not just proximity to a building from which such services are delivered.

Policy HC4 should be updated to include reference to the need to closely collaborate with local communities to determine needs and locations of public services (not just the design once a decision has been made). Communities must be able to influence the plans for their areas.

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?

A new criterion should be added to confirm that development proposals for hot food takeaways or fast-food outlets should be accompanied by appropriate waste disposal options.

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.

Strongly Agree

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.

Partly Agree

Criterion 1 should make it clear that this policy includes the loss of recorded and unrecorded public rights of way. The assessment mentioned at criterion 1a must be mandatory and publicly available.

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.

Partly Agree

Local Green Space could include some previously developed land for community buildings, etc. If an area is designated as Local Green Space, it should be protected from Grey Belt developments.

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

Criterion 1c should be updated to include light, vibration and dust pollution.

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

Local Planning Authorities must be required to add potentially contaminated sites to their register when communities present them with evidence of a risk, particularly when by a professional expert in the field.

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.

Partly Agree

Policy 3, 2 should include two new criterion:

Proposals should

f. identify the alert and evacuation procedures related to any incident that may occur in a COMAH zone

g. require the reporting and monitoring of any sinkholes that appear during development. A national record should be kept of all sinkholes and the reason for their occurrence. (note that this criterion may be better located at Policy P2 but there is no question on that policy).

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.

No comment

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

Parliament has received briefings about public concerns regarding the safety of Battery Energy Storage Systems (BESS) (https://commonslibrary.parliament.uk/research-briefings/cbp-7621/). These safety issues have not been resolved. Such developments should not be located in close proximity to residential properties, COMAH zones or the types of location identified in criterion 1d.

Developments must be required to identify the alert and evacuation procedures related to any incident that may occur in a COMAH zone or at a BESS facility.

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.

Neither disagree nor agree. But harms to the environment and communities must not be swept under the carpet for 'national need'

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.

No comment

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.

Partly Agree

A new criterion should be added to give substantial weight to community based evidence of current surface water flooding.

Please note that as there is no question related to F7, this request applies to that policy as well. Development must not increase the current 6.3m properties that are at risk of flooding (https://www.gov.uk/government/publications/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024)

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

Partly Agree

A new criterion should be added to give substantial weight to community based evidence of current surface water flooding.

Please note that as there is no question related to F7, this request applies to that policy as well. Development must not increase the current 6.3m properties that are at risk of flooding (https://www.gov.uk/government/publications/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024)

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.

Partly Agree

Given that government evidence demonstrates that over 6m properties are already at risk of flooding (https://www.gov.uk/government/publications/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024/national-assessment-of-flood-and-coastal-erosion-risk-in-england-2024), more effort must be made to ensure sustainable drainage systems and watercourse management are effective. The policy should include a new criterion to require LPAs to monitor the effectiveness of flood risk decision-making.

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.

Strongly agree

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.

No comment

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?

No comment

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 be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

No comment

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.

Strongly disagree.

This policy assumes that all non-protected land has no biodiversity value. The countryside must be recognised for its intrinsic environmental value, the ecosystem services benefits it delivers, and the habitat it provides for wildlife. It is wrong to protect pockets of nature but to unleash development across the rest of the countryside, especially given the evidence which demonstrates such environmental and ecological destruction is unnecessary (https://homesforeveryone.org/Homes-For-Everyone-Report.pdf).

To achieve the objective set out at Chapter 19, the importance of the environment and nature must be given the same prominence, priority and substantial weighting within the NPPF as economic growth. These policies must not be subordinated. Criterion 1 must emphasise, for example, that substantial weight should be given to safeguarding and enhancing the natural environment.

The significant changes to the wording compared to the previous version of the NPPF has resulted in dilution of previous protective policies, including the loss of the policy to protect and enhance 'valued' landscapes and less emphasis on the importance of best and most versatile agricultural land (previously paragraph 187).

The wording "*where that would be consistent with other policies in this Framework*" in policy criterion 1c must be removed and the policy should confirm that, once identified as important for nature in (for example) Local Nature Recovery Strategies (LNRS), land should be explicitly excluded from any allocation for development as public money will have been spent identifying sites for nature's recovery and other uses within LNRS or other policy documents. Such expenditure will be totally wasted if it is possible for this land to be sacrificed for development at some point in the future.

The requirement to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks has been omitted from this draft text, along with footnote 68, which provides important guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. This requirement should be reinserted, even if it is anticipated that such data will be provided in documents such as the LNRS. The data requirements in relation to habitats, species and ecological networks for planning purposes must be explicit.

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?

Whenever an LPA has carried out work to demonstrate that it does not have an impact on viability.

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.

Strongly Disagree

The importance of the environment and nature must be given the same prominence and priority within the NPPF as economic growth. These policies should not be subordinated. Criterion 1 must firstly emphasise that substantial weight should be given to safeguarding and enhancing the natural environment.

The requirement to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks has been omitted from the draft text, along with footnote 68, which provides important guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. This requirement should be reinserted, even if it is anticipated that such data will be provided in documents such as the LNRS. The data requirements in relation to habitats, species and ecological networks for planning purposes must be explicit.

Criterion 1a should confirm that a detailed Natural Capital assessment must be published for community review and comment (local residents are likely to have extensive knowledge of the natural capital and ecosystem service benefits of a site).

Criterion 1b should mandate that best and most versatile (BMV) agricultural land should be prioritised to meet aims to enhance and grow the rural economy. Solar, for example, should be explicitly considered to be inappropriate development on BMV agricultural land, given the availability of all the rooftops and carparks in the UK.

The requirement set out in criterion 2 to compensate for harm to biodiversity typically relates to development proposed on irreplaceable habitats. This should be explicitly considered to be inappropriate and unsustainable development and, if harms from a development cannot be avoided or adequately mitigated, the development should be refused. You cannot compensate for the complete or partial loss of an irreplaceable habitat.

As there is no question related to N3, we provide our comments here. This policy should relate to trees and hedgerows and should require that, where trees or hedgerows are lost to new development, they are replaced on a minimum 2:1 basis.

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.

Strongly Disagree

The importance of protected landscapes must not be subordinated to economic growth.

Criterion 3 should be amended to confirm that, if potential adverse impacts cannot be appropriately mitigated, development should be refused.

In addition, we cannot see how this ties in with the revised duty under section 85, Countryside and Rights of Way Act 2000 (under the Levelling Up and Regeneration Act), with its requirement to protect AND enhance National Landscapes? There needs to be legal clarity.

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.

Strongly disagree.

The provision for developers to pay a fee for a site to be destroyed and for an Environmental Delivery Plan creates a risk to internationally, nationally and locally recognised sites.

Criterion 1c should be amended to confirm that development on a site of local importance should only be supported if there is irrefutable evidence that such development will be sustainable and that there is a genuine need (taking into consideration available brownfield sites, empty homes, potential commercial conversions and sites already granted planning approval but not yet developed). Please see our recent report https://homesforeveryone.org/Homes-For-Everyone-Report.pdf.

Criterion 2 should be updated to confirm that any "*suitable compensation strategy*", must be subject to public consultation. A recent planning application in Trafford, for example, was approved on very deep peat (19.9 hectares), considered to be both irreplaceable and restorable by Natural England, without the required Masterplan being in place (a policy requirement within the regional spatial plan agreed in 2024) and without a compensation strategy being available for review (although it seems the developer considers the loss of this large area of deep peat can be compensated by just over 1 hectare of alternative habitat). This is a clear example of why the public do not trust the planning system (https://friendsofcarringtonmoss.wordpress.com/wp-content/uploads/2025/08/250516-trafford-approves-bess.jpg).

Footnote 72, referenced in Criterion 2 should be updated to confirm that 'the public benefit' will only be achieved if there is irrefutable evidence that development will be sustainable and that there is a genuine need (taking into consideration available brownfield sites, empty homes, potential commercial conversions and sites already granted planning approval but not yet developed). Footnote 72 should also be updated to confirm that '*wholly exceptional reasons*' do not include meeting the housing or employment needs of a specific LPA. It cannot be considered to be in the public interest (or sustainable development) to destroy an irreplaceable habitat unless those wholly exceptional reasons are clearly demonstrated, which should be an extremely high bar.

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

We totally disagree with the concept of allowing developers to pay to destroy habitats.

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.

Strongly Agree

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

No comment

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 HE1 – HE3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.
a) Please provide your reasons, particularly if you disagree.

Strongly Agree

188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy HE5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.
a) Please provide your reasons, particularly if you disagree.

Strongly Agree

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.

Strongly Agree

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.

Partly Agree

HE9: should include reference to the need to ensure that a development proposal does not harm the conversation area as a whole, not just the individual components.

HE10: developments should avoid very significant archaeological finds altogether. For example, a unique Roman hunting lodge near Colchester is at risk from the Norwich to Tilbury pylons project but such harm must be avoided.

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

In this chapter (and throughout the NPPF) it should be acknowledged that 'the public benefit' will only be achieved if there is irrefutable evidence that development will be sustainable and that there is a genuine need (taking into consideration available brownfield sites, empty homes, potential commercial conversions and sites already granted planning approval but not yet developed).

Please see our recent report https://homesforeveryone.org/Homes-For-Everyone-Report.pdf.

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

193) Do you have any further thoughts on the policies outlined in this consultation?

The importance of the environment and nature must be given the same prominence and priority within the NPPF as economic growth. These policies should not be subordinated. Substantial weight should be given to safeguarding and enhancing the natural environment.

Whilst there are policies in this NPPF that aim to prioritise sustainable transport, the environment and strategic planning, all of these are rendered meaningless by a system that prioritises meeting market housing targets, often on environmentally and/or ecologically rich greenfield land.

The planning process is developer-led and does not address the housing crisis or genuine housing need. See our recent report, "Veering off plan?" https://www.communityplanningalliance.org/uploads/1/3/9/4/139430416/251106_veering_off_plan_nov25.pdf.

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.

Partly Agree

Circular 06/2005 which is mentioned in the current NPPF (footnote 68) is not mentioned in this list and is not referenced in the draft text. We would expect that, either this circular is still relevant in providing "*further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system*" or an update will be issued.

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.

Partly Disagree

There is no need to further favour developers - there should instead be balanced planning policy which weighs up community, environmental and economic impacts equally. Too much harm is being caused by the exclusively growth agenda.

The National Policy Statements give far too much weight already to the delivery of infrastructure, with too little weight given to the environment, heritage and communities.

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.

No

There is no need to further favour developers - there should instead be balanced planning policy which weighs up community, environmental and economic impacts equally. Too much harm is being caused by the exclusively growth agenda.

The National Policy Statements give far too much weight already to the delivery of infrastructure, with too little weight given to the environment, heritage and communities.

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

There is no need to further favour developers - there should instead be balanced planning policy which weighs up community, environmental and economic impacts equally. Too much harm is being caused by the exclusively growth agenda.

The National Policy Statements give far too much weight already to the delivery of infrastructure, with too little weight given to the environment, heritage and communities.

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.

No

There is no need to further favour developers - there should instead be balanced planning policy which weighs up community, environmental and economic impacts equally. Too much harm is being caused by the exclusively growth agenda.

The National Policy Statements give far too much weight already to the delivery of infrastructure, with too little weight given to the environment, heritage and communities.

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

There is no need to further favour developers - there should instead be balanced planning policy which weighs up community, environmental and economic impacts equally. Too much harm is being caused by the exclusively growth agenda.

The National Policy Statements give far too much weight already to the delivery of infrastructure, with too little weight given to the environment, heritage and communities.

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.

Strongly disagree.

Leave the market to deliver policy compliant schemes.

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.

Strongly disagree.

Leave the market to deliver policy compliant schemes.

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.

Strongly Disagree

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

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.

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

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.

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

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?

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

206) Do you agree there are 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.

Strongly Disagree

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

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.

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

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?

Strongly Disagree

This is not necessary. There should be no need to consider this in a planning application. A developer should meet his obligations, full stop. Are SME developers expected to benefit from these proposals? If the developer is unable to meet their obligations, then the scheme should not proceed. There is no need for viability appraisals. A developer should do the appropriate financial planning at the time of planning application or purchasing the site with permission granted.

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.

No comment

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.

No comment

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?

If a site cannot deliver its policy obligations, it should neither gain planning permission nor be built out. It's that simple. All these questions are thoroughly over-complicating things because you are listening to developers instead of using common sense. The planning process should be plan-led, not developer-led.

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.

Strongly Disagree

No. You're overcomplicating things unnecessarily - stop talking to developers who are whispering sweet nothings about how these changes will improve things!

It's very simple:

Development that is policy compliant gains planning permission. It can be built out if policy compliant. If not, it can't.

There should be no viability appraisals or GDV or profit etc. That's the developer's problem, not the planning system's problem.

The planning process should be plan-led, not developer-led.

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 Disagree

Whilst we understand the issues raised in response to the working paper, elsewhere in this NPPF, the government is seeking commitment to higher densities. It is, therefore, inappropriate to provide a 'more generous hectare threshold' to enable development to come forward 'at average densities'. This approach will perpetuate the delivery of 3, 4 and 5 bedroomed executive homes on greenfield land.

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.

Strongly Agree as long as the hectare threshold remains at 1 hectare.

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

Yes.

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

There will be a conflict between density objectives if the hectare threshold is diluted to 2.5 hectares. Without explicit policy requirements we have concerns that larger developers could misuse this option by dividing larger schemes into smaller parcels of land, enabling delivery at lower densities than the planning process should anticipate, along with taking advantage of other proposed policy easements.

We are concerned that the definitions of '**Major Development**' and '**Medium Development**' currently overlap and, therefore, bring huge levels of uncertainty. Especially given that there are very few references to 'Medium Development' in the draft text (although we recognise there are questions in this consultation and more information in the guidance).

If the concept of '**Medium Development'** is to be agreed, the definition of **'Major Development'** must be updated (we assume to developments of 50 homes or more and/or an area of more than 2.5 hectares). All policies reflecting the requirements for '**Major Development'** must be updated to confirm the associated requirements for '**Medium Developments'.** We would anticipate, for example, that the Golden Rules (GB8) will apply to both **Major** and **Medium** development in the Green Belt.

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.

If the aim is to support SME developers, 50 dwellings is a high threshold. SMEs often focus on smaller sites that larger, volume housebuilders consider too small, including infill opportunities. We believe the small development exemption should be no greater than a scheme of 25 or fewer dwellings.

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.

No comment

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.

No comment

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.

No comment

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.

No comment

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.

Partly Agree

Permission in Principle should not apply to any site which incorporates irreplaceable habitat or other conservation areas.

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?

No comment

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.

No comment

225) Is there anything that could be done to mitigate any impact identified?

No comment

Kind regards

Marj Powner

Vice Chair

Community Planning Alliance

07801917375

About the Community Planning Alliance

The Community Planning Alliance is a national umbrella group for over 700 communities, all are campaigning against inappropriate development in their areas, and all disagree that decisions are being made in the 'public interest'. We have extensive knowledge and experience of the planning system, and our aims include seeking increased community participation, better environmental protections and the right homes and infrastructure in the right places.