

## Response ID ANON-SNQ4-RT3Q-G

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system  
Submitted on 2024-09-16 10:26:58

### Scope of consultation

### Respondent details

a What is your name?

Name:  
ROSIE PEARSON

b What is your email address?

Email:  
communityplanningalliance@mail.com

c What is your organisation?

Organisation:  
Community Planning Alliance

d What type of organisation are you representing?

Interest group or voluntary organisation

If you answered "other", please provide further details:

### Chapter 1 – Introduction

### Chapter 2 – Policy objectives

### Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No

Please explain your answer:

Government's approach to the NPPF and housing will not make housing more affordable over the term of this parliament, nor are the targets achievable. The focus on meeting market demand, using the market to deliver, is at crux of the problem. Targets are given far too great an emphasis, when their impact on climate change and the environment may be severe, but is untested. We seek to understand how the government has taken the Environmental Principles Policy Statement into account in proposing these policy changes. The December 2023 changes reflected long-held concerns that the development sector had too much sway in the planning system and sought to rebalance the system. The presumption in favour of 'sustainable' development promotes unsustainable development that has not been consulted on. At a minimum it should be renamed to reflect the reality that it is a developers' charter. The presumption, driven by high housing targets, undermines the entire purpose of the planning system, which is supposed to ensure that needs are met but that harms are minimised. Reversing the changes simply gives the developer lobby more chance to build what it wants where it wants to. Note, that the target results in 1.85m homes (371,500p.a), way over the manifesto pledge, and does not include new towns. At a current delivery rate of 229,000 dpa (new build 178,000 + conversions), not only is the target unachievable but also not likely desirable. Remember, for housebuilders: Margins over volume; Output restricted to keep prices high; Profits protected by planning guidance (15-20%) Note the owner of Hill Group saying in The Sunday Times 8/9/24 that the targets are not deliverable and, importantly, that government funding will be required. We submit by email the results of a survey which we sent to our supporters about the proposed changes. "In addition, the proposed changes do not result in a target for social housing, which we discuss in a later response. There is clear evidence (via ONS data) that the standard method results in investor homes, airbnbs and second homes, rather than addressing the dire needs of those who do not have a home to live in.

Developers do not need a target to increase their desire to build, if they do not build they do not make a profit! Furthermore, SME builders do not achieve profits protected by planning guidance."

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No

Please explain your answer:

Local authorities should have local flexibilities and those flexibilities are based on meeting local need, for example, to focus on social housing waiting lists.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

No

Please explain your answer:

The urban uplift was a blunt tool BUT it was correct to aim to focus growth into urban areas, in high density, compact and well-connected developments. The urban uplift should be evidenced (as should all planning changes), not set at a blanket % It would be helpful if there was clear guidance about regional planning, which aims to focus growth in the most sustainable locations.

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No

Please explain your answer:

Although the wording used did not address the problem that needs to be solved, which is how to ensure that the housing built is high-density, compact, walkable and served by excellent public transport it is, however, imperative that, given the pressures on farmland, the environment and countryside, new developments must be built to as high a density as possible. "Suggested alternative wording for paragraph 130:

If, in applying paragraphs 129a and b above to existing urban areas, there are exceptional circumstances which result in significant uplifts in the average density of residential development being considered to be inappropriate, such circumstances must be fully evidenced and justified. "

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Please explain your answer:

This should apply to ALL developments, not just large ones. High density brings huge numbers of benefits, from supporting services, to creating community, to being walkable and cyclable and being able to offer critical mass to support public transport. In addition, high density development use less land. There must be a public information campaign run by government which makes people aware of the benefits of density versus the many drawbacks of car-dependent sprawl. High density, compact, walkable, transit-oriented development, like Rieselfeld and Vauban in Freiburg must become the accepted, and welcomed, norm. Please adopt all the recommendations of Sustrans's submission with relation to active travel.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

No

Please explain your answer:

No. It was amended by the previous government for a reason: that it led to unplanned sprawl and that it favoured developers instead of encouraging strategic planning. The presumption in favour of development is simply a developers' charter. It is certainly not sustainable. We note that the new method is intended to be 'straightforward' and to ensure a 'balanced distribution'. Yet in fact it is a complicated process and leads to a distribution that is skewed towards rural areas, with for example, a much reduced target for London (where we should instead see high density encouraged) and, for example, a distribution in the south of England TOWARDS the areas of National Landscape (East Hants, New Forest, Test, Winchester) and away from the urban areas of Southampton and Portsmouth. Finally, the target will result in ever more impossibly high targets as areas due to the base of dwelling stock which, as it grows, will require ever more houses allocated. We agree with the CPRE that the approach should favour Sir Oliver Letwin's Independent Review of Build Out from 2018, particularly those relating to a national policy setting a baseline expectation for delivery of a range of housing types and tenures including social housing in all large development schemes, as well as a rebalancing of power away from large builders and towards local authorities and small and medium sized enterprises . Footnote 7 should be moved into the main text body to ensure that it is given full weight. Policy should also ensure that sustainable development does not just mean the materials buildings or roads are made of. The Greater Manchester spatial plan, for example, ignores footnote 7 and is building on irreplaceable habitats (against the advice of Natural England), impacting SSSIs and SBIs, with no sustainable freight transport proposed for significant warehousing developments and no confirmed funding for passenger transport (despite the site selection process being to identify a smaller number of large allocations in the Green Belt, rather than a larger number of smaller sites in more sustainable locations). It is our experience that the NPPF paragraphs that aim to protect the land highlighted in footnote 7 are largely disregarded, meaning that the balance between the economic, the social and the environmental objectives is not achieved.

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No

Please explain your answer:

No. The focus on the five year supply renders planning virtually pointless. A local authority does not control deliverability. Thus LPAs are always in the hands of developers. The obsession with five year supply means that developments in unsuitable and unsustainable locations gain permission via the back door. We need to stop planning by presumption altogether. "The 5YHS is effectively a penalty for LPAs when developers decide they will not deliver because the site will not be profitable enough (despite going through the planning approval process). Yet, there are no penalties built into the system to encourage developers to deliver in a timely fashion.

In addition, if the focus is to be on the availability of local plans, which are agreed with local communities, those plans should be paramount, LPAs should be required to maintain those plans (in consultation with their communities), the monitoring arrangements should be fit for purpose (they are not currently and more guidance is needed on what can be described as an effective monitoring regime). "

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Yes

Please explain your answer:

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No

Please explain your answer:

As above. The obsession with targets and five year supply is already a developers' charter that is leading to uncontrolled and unsustainable developments which would in many cases not be approved for allocation in a local plan The focus should be on what is in a local plans.

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

No (It should be a different figure)

Please explain your answer if you believe a different % buffer should be used:

No buffer No obsession with meaningless targets We note that the 5% buffer is on the specific deliverable sites only – not the whole of the land supply calculations. It is unnecessary to have a buffer “to ensure choice and competition in the market for land” – if developers do not build, they do not make a profit, stop pandering to them!

11 Do you agree with the removal of policy on Annual Position Statements?

Yes

Please explain your answer:

Less admin for hard-working officers. The focus should be on effective monitoring of the local plan.

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

No

Please explain your answer:

Cross-boundary ping pong is simply a function of arbitrary housing targets which do not address need, which are often undeliverable and are forced on LPAs. "Target setting needs to be much more sophisticated and focused on local need. Using an algorithm based on 0.8% of dwelling stock + an affordability factor is NOT the answer to addressing local housing need.

Also for consideration:

The term “sustainable growth” (para 24) must be adequately defined, should be fully evidenced and para 24 should also include reference to nature's recovery and future food security. Para 27a should confirm that the evidence requires a preliminary ecological appraisal (that complies with CIEEM guidelines."

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

No

Please explain your answer:

No need. They do so already. It's the quality of proposals which has been the problem, eg. North Essex Garden Communities, not the soundness tests! What is needed is more guidance for Planning Inspectors to ensure there is sufficient evidence on which to base soundness decisions. Typically, there is sufficient evidence on the need for housing and employment development but very little evidence about the impact on sites that support climate mitigation, nature's recovery and future food security. Soundness and the planning balance cannot be determined without sufficient evidence on which to base the decision.

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

"1. Look at NEED in a district and nationally 2. Set policy to address need, and fund this accordingly e.g fund social housing & sustainable and active travel 3. Do not expect the market to solve the housing crisis - it won't. Developers will only build what they can sell 4. Do not blame local authorities for not meeting targets. See 3. 5. Focus on compact, walkable, transit-oriented development, planned strategically with the DfT and other relevant gov't bodies. 6.

Stop obsessing about arbitrary and unjustified targets 7. Stop obsessing about the home ownership dream - let's look at the spectrum of choices 8. Robust policies for empty homes and permitted development, such that use of both is encouraged but supported by infrastructure. 9. Footnote 7 is too important to be a footnote - it should be in the main text: Footnote 7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 742); and areas at risk of flooding or coastal change. 10. All policy decisions should be EVIDENCED, and we see nothing to demonstrate that this is the case. There are insufficient protections in legislation, regulation or policy for land that supports climate mitigation, nature's recovery or future food security. It is sacrificed without appropriate evidence - we should understand, for example, for all Plans, allocations and alternatives, the Natural Capital Value of the land to be lost; Ecological Impact of proposed development; Carbon Emissions Implications of the Plan as a whole; Impact on the Rural Economy and food security. Ironically, when it comes to local plans, there is a ""Responsibility of plan-makers to create realistic, deliverable policies"". We do not see this from policy makers in this new NPPF.

## Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No

Please explain your answer:

Housing stock is a blunt tool. It does not direct housing to urban areas, because the formula applies to districts as a whole, some of which are very rural or have one or two key towns, yet the formula is a 'flat-rate'. Housing projections do what they say, tell us what the likely numbers of household formations are. A helpful approach might be to take the most recent 3 to 5 sets of projections and average them to smooth out fluctuations. The affordability ratio and adjustment factors are also blunt tools which address only affordability for those who might wish to buy a home. That's about demand, not need. The standard method does nothing to address need nor a wish to rent rather than buy. The standard method chases a home ownership dream, when it should be a figure that contains a broad number of inputs to establish local need across the board. 1.85m is a target far above what is required. It will not be delivered by the private market. Significant government funding will be needed for social housing. The Standard Method also does not address the need for specific housing for the elderly or those with special needs. The Standard Method does not identify the need for supporting infrastructure, whether that be new hospitals to address population growth, schools, other health services facilities, or sustainable transport. All must be provided in advance of the construction of housing or employment spaces, and must include sustainable freight transport, where appropriate.

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

No

Please explain your answer:

It is one useful factor to consider but only one factor. The standard method and adjustment factors proposed are blunt tools that will not solve the housing crisis "Note the contents of the Bank of England article here:

<https://positivemoney.org/archive/bank-of-england-confirms-positive-money-analysis-of-house-prices/>

In addition, as houses have become assets rather than homes an affordability ratio is meaningless, those with money can afford to invest in additional properties, those without cannot afford to buy one at all"

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No

Please explain your answer:

For the reasons above and because housing does not operate on a simple supply/demand basis. There are numerous studies which demonstrate this and, very simplistically, one only has to look at recent months to see demand suppressed by high interest rates, with the result that housebuilders have slowed their output. High targets don't get houses built. High targets do not solve the affordability crisis. Chasing the home ownership dream does not solve the housing crisis.

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

No

Please explain your answer:

The standard method needs a re-write from scratch. It should be much more granular, looking, as I state above, at household projections and the real local need, not demand. Demand can mask all sorts of factors that skew the figures, such as sales of dwellings to foreign investors or private equity. It is imperative that government takes an evidence based approach, looking firstly, at the real national need for new dwellings, which is not 300,000 a year!

Then it needs to look at whether new homes can be delivered through existing buildings (empties or change of use) and then at how government can fund social housing. There must be a target for Social Housing and if so, the DWP publishes Universal Credit Local Housing Allowance monthly rates which could be used to determine a baseline and LA waiting lists will provide the number in urgent need of a social home.

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

There is a need for a target for social housing (and not market housing). If the target for market housing is retained, there should also be consideration of land that already has planning permission. Those extant permissions should be taken into consideration in any calculation.

## Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes

Please explain your answer:

It is imperative that brownfield first (barring where biodiversity is exceptional) is truly brownfield first as part of a sequential test. As part of this, council's must ensure that their brownfield land registers are comprehensive. Government spot checks on this front would be helpful. All proposals for development should be subject to the outcome of a preliminary ecological appraisal (compliant with CIEEM guidelines). There should be clear guidance that, unless allocated in a local plan, no land designated as Green Belt should be considered until all the local brownfield land in the borough has been developed.

Also, outwith the planning system, the government should consider tax breaks (and other financial opportunities) to encourage brownfield development.

..

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Yes

Please explain your answer:

Planning guidance should include reference to a height limit on development (such as warehousing, for example) which may not be consistent with the local landscape character assessment

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

It is difficult to do both. If glasshouses for horticultural production are considered essential for our food security, they should be protected. But nothing should be changed on this front until evidence has been gathered. The minute it is possible to sell glasshouses land for housing, we will lose glasshouses. This is a high risk suggestion. Land/development supporting our future food security should be given a very high weighting in planning decisions.

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

Yes

Please explain your answer:

The definition is fine but adding grey belt to the mix simply adds to an already confusing planning system. It would make more sense to expand the definition of brownfield. The definition of Grey Belt includes reference to footnote 7, we reinforce our request that this footnote should be moved into the substantive text.

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes

Please explain your answer:

As with Biodiversity Net Gain, a baseline date should be set (in this case, June 2024, the start of the new government). Changes/degradations after this date must count against any planning application. Severe penalties should apply when sites are deliberately degraded (including refusal of planning applications until site is made good again). Baseline data should be set, against which all changes should be measured.

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

No

Please explain your answer:

Too complicated already. The aim should be to simplify the planning system. If necessary, strengthen the guidance to identify land which does make a contribution to Green Belt purposes – and make it clear that land that is not currently designated as GB that does fulfil one of these purposes should be added to the Green Belt

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Yes

Please explain your answer:

Need a fully evidenced, enforced sequential test.

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Yes

Please explain your answer:

LNRS's should be given maximum support and protections. They need to be worth the paper they are written on. Please factor in the need to protect urban green spaces as well as rural. Please do not forget to focus LNRS's on undesignated countryside. Undesignated countryside is not given enough attention in this NPPF.

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No

Please explain your answer:

The Sequential Test referred to in the text accompanying the consultation needs to be set in stone in the NPPF. It does not appear to be referred to in the new NPPF wording at all. It must be non-negotiable A sequential test must include requirements for robust evidence for any developments that fall below 50dph. Urban areas can sustain densities of 100dph. To prevent sprawl, to reduce car use, to increase walking/cycling & use of public transport the NPPF must insist on high density as part of a sequential test in which brownfield is first. Car-dependent, greenfield/green belt sprawl must become an exception, not the norm. In addition, 'sustainable' needs expansion as a definition, to include: i. sustainable passenger and freight transport; services & jobs near homes and available on completion of development); green spaces; valuing & protecting natural capital; demonstration that proposals will not exacerbate climate change and/or flooding; consideration of pollution of all types. Sequential text should start with further densification of existing brownfield sites – the Achieving Appropriate Densities criteria (starting with para 126 p39) have not been strengthened

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

Please explain your answer:

The term "across the area of the plan as a whole" must not undermine the function of the local Green Belt between boroughs or the strategic Green Belt surrounding a region.

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No

If not, what changes would you recommend?:

Sequential test must be set in stone, as above If this change is made to the NPPF, land should be allowed to be designated as Green Belt through local decision-making too (ie not waiting until the next local plan is adopted). Note comments above on the term "across the area of the plan as a whole".

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

No

Please explain your answer:

Any such developments must be supported by extensive sustainable transport, including sustainable freight options (where applicable), which should be available prior to the development being occupied.

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Not Answered

Please explain your answer:

The sequential test needs to be obligatory, set out in clear terms in the NPPF and non-negotiable.

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

No

Please explain your answer:

34 Do you agree with our proposed approach to the affordable housing tenure mix?

No

Please explain your answer:

The flexible approach to affordable housing tenure mix is sensible. However, the approach to affordable housing and the reliance on the market/developers to solve the housing crisis is flawed. As set out above, high targets do not deliver affordability. Planning authorities do not deliver housing. The market will not be able to deliver sufficient and truly affordable housing. Affordable housing as defined (market discount 20%) is not affordable (especially given that the discount is off a new build premium). The entire approach to delivering affordable housing needs to be rethought, and the government must fund social housing. Studies have demonstrated that social housing brings a range of societal benefits which extend to the Treasury, such as lower health costs and higher lifetime attainment, hence reduced benefits. All such decisions should be subject to consultation with the community, as should appropriate infrastructure requirements, it should not be assumed that local leaders know what is best for their communities,

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt)

Please explain your answer:

The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt) Please explain your answer: Although it is essential that all areas receive the same level of affordable housing, the question is moot because 50% 'affordable' will rarely be delivered (and will not be affordable, as set out above). The viability opt-out clause in the NPPF will be used on virtually every occasion because schemes will not support 50% affordable. For this proposal to have teeth, the 'subject to viability' clause must be removed from the NPPF. Note the likely unachievability of 50% achievable set out in an article in The Times, following research by viability experts who found that 80% of sites studied at 50% affordable pose significant viability risk and would not go ahead, and in a blog by a Barratt executive which stated that already three sites have been pulled due to issues around viability under new rules. This requirement should also apply to all greenfield developments.

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes

Please explain your answer:

We seek to understand how the "Environmental principles policy statement" has been adhered to in the NPPF policy changes proposed in this consultation. Remeinder, it is: "Policy statement setting out how policymakers apply environmental principles to support environmental protection and enhancement." Development cannot manufacture benefits for nature when it has destroyed previously nature-rich areas – the NPPF needs to incorporate more protection of existing sites of environmental/ecological importance, there should be consideration of the impact of human and domestic pet footfall on nature-rich areas, along with the impact of higher levels of air, noise, light, vibration and water pollution – appropriate evidence (in the form of a CIEEM compliant PEA and a natural capital assessment) should be provided in advance of plan-making to determine the natural capital value of existing areas

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

No

Please explain your answer:

Government should not attempt to set benchmark land values. It's a complex minefield that will result in endless debate. Don't over complicate it. Government wants the private sector to solve the housing crisis (it won't) so let the market set the value. The market will do so far more effectively and allow for nuance. Instead simply use the wording already in Viability guidance but make sure that there are no opt-outs for developers. They must not be allowed to renegotiate. Wording: "It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit

expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions. See related policy: National Planning Policy Framework paragraph 34 Paragraph: 002 Reference ID: 10-002-20190509" In summary, re viability, these are our recommendations: No viability opt-out; No fixed benchmark land value: use existing guidance; Impact study: what if policies can't be delivered?; Community Infrastructure Levy (+s106) everywhere; Government funding for new towns and social housing; Workplace charging/local congestion charging to pay for public & active travel; No removal of CPO hope value

38 How and at what level should Government set benchmark land values?

Please explain your answer:

Government should not attempt to set benchmark land values. It's a complex minefield that will result in endless debate. Don't over complicate it. Government wants the private sector to solve the housing crisis (it won't) so let the market set the value. The market will do so far more effectively and allow for nuance. Instead simply use the wording already in Viability guidance but make sure that there are no opt-outs for developers. They must not be allowed to renegotiate. Wording: "It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions. See related policy: National Planning Policy Framework paragraph 34 Paragraph: 002 Reference ID: 10-002-20190509". In summary, our recommendations are as follows: No viability opt-out; No fixed benchmark land value: use existing guidance; Impact study: what if policies can't be delivered?; Community Infrastructure Levy (+s106) everywhere; Government funding for new towns and social housing; Workplace charging/local congestion charging to pay for public & active travel; No removal of CPO hope value

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Not Answered

Please explain your answer:

There must be no viability opt-out clauses in the NPPF. For the golden rules to carry any weight, they must be set in stone. Otherwise we will see market price homes with very limited 'affordable' homes and little of the required infrastructure. In addition, if there are 'golden rules', they should apply to all development.

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

If a development is policy compliant no additional contributions should be sought. Policy is policy, in the same way that the policy requirement must be delivered

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

No

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

There should be NO viability negotiations at any stage on either side. The current wording is strong but must be enforced: It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions. See related policy: National Planning Policy Framework paragraph 34 Paragraph: 002 Reference ID: 10-002-20190509

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Yes

Please explain your answer:

Golden rules must be non-negotiable and there must be no viability opt-out clauses In line with the Golden Rule to "Boost Public Services and Infrastructure", any such developments must be supported by extensive sustainable transport, including sustainable freight options (where applicable), which should be available prior to the development being occupied.

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?



Yes

Please explain your answer:

Draft plans at Reg 19 should already have been tested for viability. It is not realistic to retrospectively apply new golden rules which affect viability at this stage.

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Yes

Please explain your answer:

No viability negotiations should be allowed. Local authorities will have a viability appraisal that supports their local plan. This will set out approximate benchmark land values across an authority area (they will be huge variable). Government should not attempt to set benchmark land values. Use existing wording in PPG and enforce. Wording: It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions. See related policy: National Planning Policy Framework paragraph 34 Paragraph: 002 Reference ID: 10-002-20190509

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Yes

Please explain your answer:

A firm no to these proposals. Removing hope value has been attempted before and was soon revoked. It introduces an unfair, two-tier system that will be challenged in the courts and cause delay. The public interest test is unlikely to be met by (un)'affordable' homes at a discount to market rate, nor to development led by the private sector. Please listen carefully to the Compulsory Purchase Association (esp Raj Gupta) before taking any further steps on this front

46 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

In summary: 1. No viability opt out clauses 2. No attempts to set a standard benchmark land value 3. No removal of hope value

## Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Please explain your answer:

Absolutely. Need should be the starting point for housing policy to address the housing crisis. Social rent is the most basic of needs. It should be prioritised. That said, it will require significant government funding (which, as set out above, will bring broader economic benefits, not least reduce healthcare costs, reduced housing benefits and reduced work benefits).

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes

Please explain your answer:

49 Do you agree with removing the minimum 25% First Homes requirement?

Yes

Please explain your answer:

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

No

Please provide any further comments:

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes

Please explain your answer:

These should be in accordance with a local authority's SHMA (Strategic Housing Market Assessment) to ensure that the development meets NEED, not developer desires

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

Public subsidy. Fund it, build it. Also repurpose the extensive number of empty/investor homes that have been built in cities like Manchester and the oversupply of office space

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

No maximum. We should not assume that social housing tenants bring problems. Social housing on the continent is much more normal. See Austria as a good example. This summary taken from Chat GPT: ent. Design and Architecture: High-Quality Design: Austrian social housing places a strong emphasis on architectural quality, with many developments winning international acclaim for their design. The focus is not just on quantity but also on creating aesthetically pleasing and sustainable living environments. Green Spaces: Most large social housing projects include extensive green spaces, communal areas, and facilities such as kindergartens, schools, and medical centers, making them self-sufficient communities. Examples of Large Developments: Wohnpark Alterlaa: This massive development includes around 3,200 apartments, spread across several high-rise buildings. It also features extensive communal facilities, including swimming pools, saunas, and tennis courts. Seestadt Aspern: One of Europe's largest urban development projects, Seestadt Aspern, includes a significant portion of social housing. When complete, it is expected to accommodate 20,000 residents. Comparison: Compared to other countries, Austrian social housing tends to be much larger in scale, more integrated with urban planning, and designed with a long-term vision for community building. This approach has helped Austria maintain high standards of living in its social housing sector, contributing to its reputation for excellent public housing. These large, well-planned developments reflect Austria's strong tradition of social housing, particularly in cities like Vienna, where nearly 60% of residents live in municipally owned or subsidized housing. All homes (bought or rented) must be maintained to the same minimum (and enforceable) standards

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

- Support for almshouses & Community land trusts- Flexibility for small scale affordable housing to come forward outside the local plan- Empty homes re-used; further encouragement in permitted development rules for barn conversions to become multi-home redevelopments instead of large, luxury homes- Government funding for new, small-scale, social housing- Remove need for change of use for small scale domestic conversions of outbuildings Make it a priority when Green Belt release is required, as it is typically in rural areas.

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes

Please explain your answer:

56 Do you agree with these changes?

No

Please explain your answer:

An exception site should be just that, not a route to large scale development We support the Community Land Trust response - see [https://docs.google.com/document/d/e/2PACX-1vSRIdZvMCBv5-rMpLnLQtoYy2Xe8UlWYnblvq53kIPeeqR5O\\_-AkXhqJOhXWSBf1aLl4H1y4ZDtllml/pub](https://docs.google.com/document/d/e/2PACX-1vSRIdZvMCBv5-rMpLnLQtoYy2Xe8UlWYnblvq53kIPeeqR5O_-AkXhqJOhXWSBf1aLl4H1y4ZDtllml/pub)

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

If Yes, what changes would you recommend?:

The paragraph should be rewritten and completely simplified to say: Affordable housing for rent should be set at 35% of net household income. This is a widely accepted figure (Shelter, National Housing Federation, Joseph Rowntree Foundation) as a measure to ensure that housing costs do not force individuals or families into poverty, allowing them to maintain a decent standard of living. Given that social housing is for the most needy, the figure could be set as a percentage of lowest quartile income or some equivalent. To illustrate why 'affordable' housing at a discount from market is not affordable, see the gap between new build prices and existing home prices, which can be as wide as £100k: <https://landregistry.data.gov.uk/> Right to buy should be removed to prevent the continued loss of social housing for private gain.

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Yes

Please explain your answer :

Given that for a site to be included in a local plan it must be demonstrated to be deliverable, and therefore requires a willing promoter, more small sites will not be allocated simply by asking LPAs to find more. Nor can, or should, an LPA allocate small sites at random to meet a forced target. Those sites would then likely not be delivered. The answer is for an LPA to have policies which welcome small site applications at any stage, even post adoption of a plan. Those small sites should be policy compliant in terms of location etc but subject to lower developer contributions to assist with viability.

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Yes

Please explain your answer:

60 Do you agree with proposed changes to policy for upwards extensions?

Yes

Please explain your answer:

61 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

An infrastructure first approach must be taken. No development must be permitted without infrastructure including adequate sewage treatment plants to prevent any increase in sewage discharges into our rivers and seas. It is good to hear that the proposed Infrastructure Levy changes will not be taken forward. Now all LPAs should be strongly encouraged to adopt CIL. It is extraordinary that communities are denied the additional infrastructure that could be delivered with CIL in addition to S106.

## Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

No

Please explain your answer:

This will not work. Why ask all LPAs to allocate sites for all these uses when in some cases there is no demand? As with all planning decisions, this should be evidence-based and strategic and respond to NEED, which will be hugely variable. Not every LPA will see demand for any of the uses mentioned. When it comes to grid connections, for example, this should also be strategic. A local plan should deliver for need in the local area based on strategy, analysis and evidence. There should be no blanket allocation of sites as suggested. "Communities need diversity in job opportunities to ensure the community is sustainable, this will only be delivered based on a needs assessment.

In addition, for Freight and Logistics the development must deliver sustainable freight transport, it is not sustainable to keep pouring more and more HGVs onto our road network.

The carbon emissions implications of all such developments should be available within the evidence base (in sufficient detail to enable robust scrutiny) 87b is the only mention of the word "decarbonisation" in the document. Essential that sustainable freight is a key requirement for any large-scale warehousing or logistics developments – paragraphs 158, 159 and 160 have not been strengthened (they are typically ignored)."

63 Are there other sectors you think need particular support via these changes? What are they and why?

No

Please explain your answer:

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Not Answered

Please explain your answer:

You need an 'unsure' button on these questions. The NSIP regime has advantages and disadvantages. We are neutral on this question. But the key question will be how to ensure that LPAs are resourced to deal with either applications direct or applications via the NSIP route As mentioned above, the climate/carbon issues related to such developments should be explicitly made available in the evidence base

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Not Answered

If Yes, what would be an appropriate scale? :

All developments should be subject to community consultation and citizen scrutiny.

66 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

Please rethink them altogether. A blanket allocation of land for a random set of uses will not solve any problems and is not strategic All developments should be subject to community consultation and citizen scrutiny.

## Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

No

Please explain your answer:

These changes give unfair weight to the project promoter. Planning is about balance. Pros & cons of a proposal must be considered without a heavy hint that the application will be granted. There is no reference in this change as to how such important public service infrastructure would be funded - risk must be shared, as should benefits - if there is no committed funding for the required infrastructure, the development should not be approved.

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes

Please explain your answer:

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

No

Please explain your answer:

Paragraph 114, yes. It is imperative that ALL new development is well served by public transport, is walkable and has safe cycle routes. There should be no more 'unlocking' roads and no more car-dependent development. Paragraph 115, NO. The 'all tested scenarios' wording must be removed because it gives developers too much room to game the system, submitting unrealistic scenarios such as 100% of residents will walk. We support the hierarchy devised by the Energy Saving Trust and endorsed by the CPRE, for a transport hierarchy as follows: remote working; active/public transport; sustainable private vehicles, Internal Combustion Engines. We also support the need set out by the CPRE for new, revised modelling and are pleased that MHCLG recognises the problem of a predict and provide system. We recommend an approach that reduces land take (higher density) and increases active travel (compact developments) with all homes a maximum of 800m walk from public transport. "There must be a clear definition of the "vision led approach" (which should be subject to consultation) and it must include explicit reference to sustainable freight transport options, where freight and logistics are to be provided – the vision should be based on section 2 (sustainable development) – developers could take advantage of any ambiguity The change to paragraph 115 (now 113) to insert "in all tested scenarios" appears to be a "get out of jail free card". The alternative scenarios should be consulted upon and it should be clear on what basis each is being proposed, each scenario should be underpinned by robust evidence to ensure that they represent a realistic option There should be explicit reference to the evidence base including the carbon implications of a development (in sufficient detail to support community consultation and enable citizen scrutiny) Car/HGV-dependent, developments should no longer be approved and there should be clear and binding obligations on developers (and public bodies) to provide the necessary sustainable transport and active travel options"

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

No more car-dependent development (and no 'unlocking roads') Public transport Walkable & cyclable developments High density development surrounded by public green space (see Vauban in Freiburg) - in a move away from parks that people have to make a conscious journey to visit.

71 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

Learn from Freiburg: <https://www.linkedin.com/pulse/freiburg-should-we-try-home-rosie-pearson/>

## Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Not Answered

Please explain your answer:

Whatever happens with relation to renewables planning, communities must be engaged with in the new strategy and the Treasury Green Book must be followed.

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

No

Please explain your answer:

There should be a sequential test for renewables, esp solar, such that a ground-based solar on best farmland is not given permission if rooftops have not been exhausted. All LPAs must be required to have policies for solar on new homes and new commercial buildings and on all car parks. See Italy and France for examples. No Best & Most Versatile Farmland should be lost to solar - there is no need. A report for the CPRE in 2023 found that there is enough rooftop space to meet the UK's solar targets and this was backed up by the Warehousing Association's study which found enough south-facing commercial roof space for 50% of England's electricity generation.

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes

Please explain your answer:

Protections for habitats, NOT compensatory mechanisms There should be an explicit requirement to secure the restoration of all our peat mosses in line with Natural England guidance to enable carbon sequestration and better water control/management

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

Unsure but whatever is decided LPAs must be funded to deal with planning permissions direct to them or to respond to NSIPs permissions. Treasury Green Book guidance must be followed in the NSIP process and communities engaged with before decisions are made.

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

Unsure but whatever is decided LPAs must be funded to deal with planning permissions direct to them or to respond to NSIPs permissions. Treasury Green Book guidance must be followed in the NSIP process and communities engaged with before decisions are made.

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

Unsure but whatever is decided LPAs must be funded to deal with planning permissions direct to them or to respond to NSIPs permissions. Treasury Green Book guidance must be followed in the NSIP process and communities engaged with before decisions are made.

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

Evidence-based appraisal of alternatives, in consultation with communities.

1. Refuse all low density, car-dependent development 2. Plan strategically so that public transport, cycle infrastructure and walkable developments are prioritised 3. Insist on solar on all new rooftops & car parks 4. Bring back empty homes into use; convert empty shops and offices (with proper controls to ensure they are suitable for habitation, that they provide a % affordable homes and that they contribute S106 and/or CIL) 5. High density urban development, not greenfield sprawl

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

An evidence-based approach to planning is needed and is not yet happening. There is far too much reliance on 'professional judgement', often in a complete vacuum or even ignoring evidence.

Insufficient work has been done to determine the carbon implications of plan-making and decision-taking, however some good work has been done by Cambridge LPA

(<https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020> and Steady State Manchester (<https://steadystatemanchester.net/wp-content/uploads/2023/11/p4e-carbon-impact-report-draft-v5.0.pdf>)

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Not Answered

Please explain your answer:

Don't build on flood plains. Move to natural flood management whenever possible. Bring back beavers!

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Not Answered

Please explain your answer:

See q78

82 Do you agree with removal of this text from the footnote?

No

Please explain your answer:

Food security needs to be our top priority given the climate change risks to our own domestic crops and imports. (It should have been in the main text, not a footnote). The deletion should be restored, the importance of BMV agricultural land should be given a high weighting in planning decisions. This footnote should be moved to the substantive text

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Please explain your answer:

Do not allow development on best and most versatile farmland. Full stop.  
Publish land use framework for public consultation asap.

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes

Please explain your answer:

Yes but it should be absolutely clear that all such projects must be subject to extensive consultation and public scrutiny

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Yes

Please explain your answer:

Secretaries of State must not overrule the Planning Inspectorate on a whim, as with Sunnica. This undermines trust in the planning system. It was a travesty that, only three or four days into power, Labour ignored the findings of the Planning Inspector to approve Sunnica

86 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

## Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Not Answered

Please explain your answer:

How would community consultation be delivered in this case?

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

Legal tests must always underpin intervention powers and community consultation should be considered paramount.

## Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

No

Please explain your answer:

These proposed domestic fees are very high. In some instances, planning applications are for minor changes. These changes represent a stealth tax. Planning is one of the services offered by local authorities and home owners already pay tax.

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

No

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

A 50% increase would be more reasonable but this still represents a stealth tax  
Fee increases should be inflationary, not represent an attempt to shore up council finances.

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

Inflationary increase

In all planning fees residents should pay less than housebuilders/developers, and SME's should have discounts versus the big housebuilders.

The council planning department is not a business - it is a public service. The council receives funding from govt, council tax and other sources and provides a public service to residents. Why are we suddenly being asked to pay more for it?

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

No

Please explain your answer:

.

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Not Answered

Please explain your answer:

95 What would be your preferred model for localisation of planning fees?

Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.

Please give your reasons in the text box below:

With an inflationary cap

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

No

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

It is not clear to me that we should be aiming for cost recovery. The council planning department is not a business. The council receives funding from govt, council tax and other sources and provides a public service to residents. Why are we suddenly being asked to pay more for it?

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Yes

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

LPA's must be adequately resourced to represent residents and respond to NSIPs. Cost recovery from the applicant may be the way to do this.

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer.:

## Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

No

Please explain your answer:

For those LPAs at an advanced stage there should NOT be a requirement to immediately start preparation of a new plan. What is the point of adopting a plan and then immediately reviewing it? It is also a huge waste of money when the previous questions are trying to ask users to pay more for planning services.



104 Do you agree with the proposed transitional arrangements?

No

Please explain your answer:

For those LPAs at an advanced stage there should NOT be a requirement to immediately start preparation of a new plan. What is the point of adopting a plan and then immediately reviewing it

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Digitisation is to be welcomed. The wording above notes that gov't will engage with the 'sector'. This implies the development profession. Engagement must be wider, with all stakeholders, including communities.

## Chapter 13 – Public Sector Equality Duty

106 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? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

There is no evidence of any impact assessment to ascertain how the proposed changes to the NPPF will impact the most vulnerable in our society. Under the Public Sector Equality Duty government must consider how decisions affect groups with protected characteristics, including age, disability, race, religion, sex, and more.

In this instant there are several untested risks associated with the proposals, not least:

1. Leaving the private sector to address the housing crisis will mean that those with lower incomes, particularly young people, will find themselves without the safety net of a social home; housing waiting lists may grow and those in temporary accommodation, including children, will have no hope of a stable home. This NPPF therefore puts the poorest and youngest in our society at risk of homelessness and no impact study has been carried out.
2. The focus on housing targets instead of a balanced planning system which meets needs within planetary boundaries could lead to environmental impacts on vulnerable people. For example, the building of ever more unsustainable car-dependent sprawl (which will have to be approved by councils despite the known consequences because they are forced to meet targets) will lead to greater air pollution. It is well known that our most disadvantaged societies and those already with illnesses such as asthma and COPD are most affected by poor air quality. Not only that but car-dependency lead so to an unhealthy lifestyle. And car-dependency penalises the poorest in our society, who are unable to afford private transport. These proposals have not been impact tested to ascertain their affect on the most vulnerable.

All likely impacts on protected and vulnerable groups of these proposals must be impact tested. These NPPF proposals breach the Equality Act 2010.

## Chapter 14 – Table of questions

## Chapter 15 – About this consultation