

# National Planning Policy Framework

## Consultation questions

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

Email responses to: [planningframework@communities.gsi.gov.uk](mailto:planningframework@communities.gsi.gov.uk)

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

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SW1E 5DU

### (a) About you

#### (i) Your details

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

Organisational response

Personal views

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

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

Yes

No

Name of group:

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

Private developer or house builder

Housing association or RSL

Land owner

Voluntary sector or charitable organisation

Business, consultant, professional advisor

National representative body

Professional body

Parish council

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

Other public body (please state)

The Commission for Rural Communities (CRC) was established in April 2005 and became an independent body on 1 October 2006, following the enactment of the Natural Environment and Rural Communities Act, 2006.

The Commission has the following three roles:

1. Listening to and representing the views of rural communities
2. Giving expert advice
3. Acting as an independent watchdog

We have a statutory responsibility to act as an advocate for rural communities and businesses and provide independent advice to government and others to help ensure that policies and programmes reflect the needs of people living, working and doing business in rural England. We have a particular focus on tackling disadvantage and economic under-performance.

In June 2010 the Secretary of State for Environment, Food and Rural Affairs announced the abolition of the CRC as an independent arms length organisation. In the period leading up to our planned closure in 2012, we are continuing to fulfil our statutory functions via our Chairman and nine Commissioners. Some of CRC's previous work has transferred to a new Rural Communities Policy Unit within Defra.

Other (please state)

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

Yes

No

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

## (b) Consultation questions

### Delivering Sustainable Development

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

1(a) – Do you agree?

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

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

#### **General comments**

The presumption in favour of sustainable development (paragraph 13-18) should help provide much needed housing in villages where the default position has all too often been "no". In many rural areas, development necessary for the ongoing viability of communities has been prevented. Previous planning policies, particularly those concerning regional targets, were often a restraint on building in villages, as numbers were often used up in urban areas. It is vital for the future of the countryside that planning policy strikes a better balance between the social and economic sustainability of rural communities and their environmental sustainability.

The CRC welcomes many of the core planning principles outlined in the NPPF (paragraph 19), particularly those concerning a plan-led approach based on wide consultation, with decisions taken at the lowest level possible, and the reference that, "planning policies and decisions should make effective use of land," and, "promote mixed use developments that create more vibrant places", as many rural settlements are becoming the increasingly exclusive preserve of wealthier households, especially in smaller settlements.

We also wish to acknowledge the welcome references to particular rural circumstances in relation to business (paragraph 81) and transport (paragraph 82).

However, the core planning principles in the NPPF, as well as the section on plan making, are not sufficiently clear as they do not specify the detail the "positive long-term vision" should contain.

### **‘Sustainable locations’**

There is some ambiguity in the NPPF about the concept of sustainable locations, which might be open to legal challenge. The presumption in favour of sustainable development states that, "at the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible" (paragraph 14). Paragraph 124 goes on to say, "the planning system should....create a built environment that facilitates social interaction and inclusive communities", which the Affordable Rural Housing Commission and the CRC have long argued for in rural villages when making the case for affordable housing. However, paragraph 112 says, "to promote sustainable development, housing in rural areas should not be located in places distant from local services." This could undermine the helpful policies elsewhere in the document and could result in local authorities reverting back to development policies based on settlement hierarchies defined in terms of levels of service provision. Moreover, this could be used to perpetuate the old ‘key villages’ hierarchy for development, which would undermine the sustainability of smaller rural communities, and exacerbate the problem of a lack of affordable rural housing in smaller communities, thus contributing to a spiral of decline, as highlighted previously by both the 2006 Affordable Rural Housing Commission and more recent 2008 Mathew Taylor report.

The CRC has always advocated looking at communities as "clusters" rather than in isolation. It rejects the idea that rural communities are inherently unsustainable, and believes that people in rural England should be allowed to find ways of making their communities more sustainable, including through new housing and employment. We therefore suggest that paragraph 112 of the draft NPPF is changed to:

*“In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing. The policies they use are a matter of local choice, but they should be based on evidence. They could: allocate sites for a mix of market and affordable housing; not allocate any sites, but set targets for residential development and require a percentage of any development to be affordable housing, defined with reference to local needs and a local benchmark land value; use rural exception sites, without and with market housing limited to that which funds the affordable housing.*

*To promote sustainable development in rural areas housing, including affordable housing, should be located where it will*

*enhance sustainability, taking account of the relationships between settlements so that growth redresses imbalances in the type and tenure of housing available in the community; supports informal social support networks and local economic activity; and where possible provides environmental benefits.”*

## Plan-making

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

2(a) Do you agree?

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

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

### **General comments**

The CRC favours a plan-led approach rather than a deregulated free-for-all: Local Plans are central to striking an appropriate balance between countryside protection and economic and social sustainability.

However, there is ambiguity when the framework describes Local Plan making, and later Neighbourhood Plans. This is causing considerable confusion for organisations such as rural housing associations over how the various plans will inter-relate.

For example, the draft framework (paragraph 23) states that local planning authorities must set out the strategic priorities for the area, including housing and economic development, and allocating sites to promote development. It also states that local authorities should prepare a strategic housing assessment. However, the framework does not say whether this should contain numbers – presumably because the Government wishes to move away from prescribing targets. In the section on Neighbourhood Plans (paragraph 49), the framework makes clear that these, "should be aligned with the strategic needs and priorities of the wider local area," and, "therefore, must be in general conformity with the strategic policies of the Local

Plan." However, if the strategic plan contains no allocations on a site specific basis, it might be open to legal challenge, which would drag out the planning process.

### **Neighbourhood Development Orders**

Similar concerns also exist in terms of Neighbourhood Development Orders. Whilst in theory these should signal the approval and conformity of a Neighbourhood Plan with both the Local Plan and NPPF, the subsequent right given to the community to grant planning permission for the new building envisaged may simply result in the shifting of legal battles downwards, with challenges resting with local authorities rather than regional bodies.

### **Localism Bill**

There is also considerable confusion over how the Localism Bill and NPPF are to relate, for example concerning referendums. The NPPF makes clear that if Neighbourhood Plans do not conform with the Local Plan, they will not be put to a referendum. However, elsewhere in the Localism Bill the Government is proposing that local people should be able to trigger a referendum on any issue they want. This gives rise to the question of what will happen if a community demands a referendum on a proposed development and says no if that development is in the Local Plan. This has the potential to create real problems for local decision makers.

### **Drafting period for Local and Neighbourhood Plans**

Concerning the Local Plans themselves, we also suggest that more time is given for local authorities to draw up, consult and agree these documents. This may go some way towards mitigating concerns around the abuse of the presumption in favour of sustainable development during the transition process between the current and new planning systems. It is also essential that the Government clarifies the balance between the importance of Neighbourhood Plans, and the presumption in favour of sustainable development, as currently there are concerns that the former will not be robust enough to withstand the latter.

### **Evidence base**

It is essential that the NPPF stresses the importance for Local and Neighbourhood Plans to be based on a strong evidence base which informs plan making and therefore helps to ensure that resulting activities are fit for purpose and address the real needs of an area. It is important that any collection and analysis of evidence recognises the distinctiveness of rural areas, and the barriers to and opportunities for growth in these areas. This may not be a straightforward task. Due to their size and dispersed nature, the characteristics of, for example, some rural economies, may not initially be visible. Using datasets at the

lowest spatial level available, for example at lower super output area level, will help local authorities and communities understand what is happening in their communities.

The CRC has a wealth of evidence available which can be used to assist the above, for example our report on filling gaps in the evidence base on rural deprivation <http://crc.staging.headshift.com/2008/05/20/deprivation-in-rural-areas-quantitative-analysis-and-socio-economic-classification-exec-summary/>, which estimates the overall rural share of deprivation at a national, regional and output area level, and identifies very small area 'hotspots', highlighting the existence of rural deprivation even in areas which are relatively prosperous and are not picked up by the Indices of Multiple Deprivation.

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

2(c) Do you agree?

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

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

### Decision taking

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

3(a) Do you agree

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

Disagree

Strongly Disagree

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

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

4(a) Do you agree

Strongly agree

Agree

Neither agree or Disagree

Disagree

Strongly Disagree

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

**Neighbourhood Planning**

The principles under which the Neighbourhood Planning approach is based are focussed on the concept of active citizenship; the belief that people will be motivated to help not just their own families but the wider community. The Government has an important role to play in both supporting and enabling this, particularly in terms of increasing the capacity that exists in communities to realise these opportunities. Furthermore, whilst the Government has said that local authorities will assist local groups, the question remains whether councils will have the resources to do this, including funding the much needed housing enablers to help local residents realise their vision for the local community.

There is certainly also a need for the Government to ensure guidance is provided to local communities to ensure a sound understanding of their increased role in shaping their local areas. CRC understands that the Government has been working with Action with Communities in Rural England (ACRE) to see how the experience of Community Led Planning can inform the development of Neighbourhood Planning policy. The CRC would be fully supportive of any plans to provide guidance on Neighbourhood Planning via such organisations.

Furthermore, CRC would support any plans to provide guidance around how Local and Neighbourhood Plans will inter-relate. As stated in our comments under section 2b above, there is ambiguity when the draft NPPF describes Local Plan making, and later Neighbourhood Plans, which is causing considerable confusion for organisations such as rural housing associations over how the various plans will work in practice.

### **Affordable Housing**

In section 10b below, we highlight the pressing need for more affordable housing in rural areas, and some of the difficulties and barriers that have contributed to this need. CRC is of the view that the draft NPPF provides the necessary hooks for further advice to be provided on the range of mechanisms that planning authorities can use to deliver rural affordable housing, including cross subsidy on rural exception sites (sites which are provided exclusively for affordable housing in perpetuity).

The lack of clarity regarding the future of exception sites is creating real confusion among RSLs and councils. The Government has indicated that it will be down to local councils to decide their own approach. Therefore if they want to continue with an exception policy, they can. However, although rising inward migration to rural areas has led to an acknowledged need for more market housing in rural areas, there is real concern that communities may be less receptive to proposed developments if they do not have the assurance that the houses will go to local people in need. Moreover, if communities are to take action to shape their communities, including meeting their affordable housing needs, local planning authorities will need to have enabling policies in place. Without some form of statutory or national backing, local authorities will be wary of adopting such measures.

Unlike urban areas, rural areas often have a few large local landowners and are dependent on their co-operation for the use of land for providing new affordable housing. In addition, rural communities are often resistant to the scale of market development that is usually required to trigger the affordable housing needed. They are therefore likely to look for smaller sites which, to have any chance of providing affordable housing, will have to be low value – these are likely to be rural exception sites. Even so, these require willing landowners and significant capital funding. Providing cross subsidy, limited to only that which will fund the affordable housing, at typical rural exception site prices, would reduce this burden and help a community realise its ambition of providing affordable housing in their village.

The CRC would be pleased to provide further information re-

garding the nature of any such forthcoming guidance.

### **Business and economic development**

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

5(a) Do you agree?

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

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

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

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

6(a) Do you agree?

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

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

**Transport**

The policy on planning for transport takes the right approach.

7(a) Do you agree?

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

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

**Communications infrastructure**

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

8(a) Do you agree?

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

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

## Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

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

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

## Housing

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

10(a) Do you agree?

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

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

### **General comments**

The 2006 Affordable Rural Housing Commission calculated there was a need for 11,000 new affordable homes per annum in settlements of less than 10,000 population. This translates into 7,500 new affordable homes per annum in settlements of less than 3,000 population. Between 2008 -2010 an average of 2,646 new affordable homes were built.

The average priced house in rural areas in September 2010 was £38,546 more than in urban areas. The lack of affordable homes in many rural communities often forces indigenous, low

income families to move away. This not only breaks the natural support networks that have existed for generations but also leaves behind unbalanced communities with failing schools, post offices and services. England's villages need more housing if they are going to survive, and thrive as vibrant communities for the next generation – not huge developments which dwarf the existing village, but small developments of perhaps ten or twelve dwellings, in keeping with the environment. This, in CRC's view, is how the presumption in favour of sustainable development should be interpreted, and furthermore, what should result.

As outlined in 1b above, fundamentally, the NPPF could help deliver more desperately needed affordable housing. The presumption in favour of sustainable development should help provide much needed housing in villages where the default position has all too often been "no".

### **Brownfield sites**

Similarly, the abolition of the brownfield target is a positive step and should help villages, as there has often not been enough brownfield land to provide sites, with those that are available often being contaminated and costly to develop. The current planning system has meant that in many rural areas, development necessary for the ongoing viability of communities has been prevented by the lack of brownfield land available, and the fact that the housing targets laid down in regional plans were often used up by urban areas, leaving little scope left for development, as well as considerable delay, especially in terms of affordable housing, as well as significantly increased costs. These issues were highlighted by the 2006 Affordable Rural Housing Commission, which found many people in villages frustrated about their inability to build because the allocations within the Regional Spatial Strategy had already been used up nearer towns.

Whilst the CRC would certainly agree that brownfield land should, where possible and where it is available, be used in the first instance, we would caution against any re-instatement of the brownfield target, as this has been a major barrier on the development of affordable houses in many rural areas. A change the Government might consider to the NPPF is to be more specific about the ability of local authorities to devise their own policies on the greenbelt and brownfields, provided they can meet properly assessed need in places where it is expected to arise. However, this should not be used by local authorities as an excuse for not developing villages at all.

### **Exception sites**

Addressing the rural affordable housing need is more significantly dependent on local landowners being willing to release

sites than is the case in urban areas. Providing incentives to landowners to release sites is essential if community action to address this need is to succeed. The CRC is therefore concerned by the removal of exception sites from new planning legislation. These are sites which are provided exclusively for affordable housing in perpetuity – i.e. they cannot be sold on the market. Under this provision, landowners have sold land to housing associations and community trusts at substantially discounted prices to enable affordable housing to be built in smaller rural settlements. There is an urgent need for clarification that exception sites will be allowed to continue, as the framework does not explicitly refer to them. This has led to considerable concern from rural housing associations as over half – 57 per cent – of affordable housing in settlements under 1,000 has been on exception sites, and just over a third in settlements of over 3,000.

The NPPF does state (paragraph 112) that, “local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing”, and goes on to say that, “local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.” CRC welcomes these proposals, which will ensure more balanced communities and help young people who are seeking to form new households. The proposals may also assist the financing of affordable rural housing through cross-subsidy (so long as land prices are not inflated as a result, which is a concern amongst some rural housing associations).

The NPPF’s accompanying Impact Assessment includes a heading on “removing exception sites”, which states that “the rigid requirement for sites to be only for affordable housing limits local councils’ options for meeting the full range of housing needs”. This suggests that exception sites are being removed, but an exemplary case study is then offered of an exception site policy operated in Cornwall. There is some obvious confusion here and we would request clarification on this issue.

If local authorities were no longer allowed to operate a rural exception sites policy, there is real concern that communities may be less receptive to proposed developments with no assurance that the houses will go to local people in need. Furthermore, there is concern that the economics of some small developments will be undermined by the reluctance of landowners to continue selling land at discounted prices if they think the land will be used for some market housing.

There is also a related concern that where local authorities have no adopted plan, local planning applications relating

to green fields will be judged against the NPPF. If that does not contain an exception sites policy, they might have no legal basis. This underlines the earlier recommendation that local authorities should have more time to prepare up to date plans. Alternatively, it might be possible to deal with this through supplementary planning guidance.

## Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

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

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

## Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

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

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

## Green Belt

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

13(a) Do you agree?

- |                |                          |
|----------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
|----------------|--------------------------|

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

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

**General comments**

In order to fully understand the Government's proposed changes to the planning system, the draft NPPF has to be seen in conjunction with the Localism Bill. Through the Localism Bill, the CRC understands that the Government is making provisions to ensure that councils will be able to protect the green belt as part of their Local Plans. This important check, if carried out properly, will be crucial to ensuring that councils actively consider the option of 'preserving' the countryside, including the green belt, whilst also assisting the people who live in rural areas to thrive.

The CRC would strongly recommend that concerns of loss of countryside protection might be assuaged by increasing the time permitted for Local Plans to be prepared, such that in the vast majority of rural England locally agreed plans would provide the context for the application of the presumption for sustainable development.

**Climate change, flooding and coastal change**

The policy relating to climate change takes the right approach.

14(a) Do you agree?

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

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

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

14(c) Do you agree?

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

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

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

14(e) Do you agree?

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

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

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

14(g) Do you agree?

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

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

## Natural and local Environment

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

15(a) Do you agree?

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

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

## Historic Environment

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

16(a) Do you agree?

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

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

## Impact assessment

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

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

## Planning for Travellers

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

## Specific questions on the impact assessment

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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