

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT & NEIGHBOURHOOD SERVICES

TO:	PLANNING APPLICATIONS COMMITTEE		
DATE:	25 APRIL 2018	AGENDA ITEM:	9
TITLE:	DRAFT REVISED NATIONAL PLANNING POLICY FRAMEWORK AND ASSOCIATED CONSULTATIONS, MARCH 2018		
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
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1. PURPOSE AND SUMMARY OF REPORT

1.1 A draft Revised National Planning Policy Framework (NPPF) was published by the Department for Housing Communities and Local Government (DHCLG) on 9th March 2018. The revised NPPF is intended to set out how various reforms upon which the government has previously consulted, such as various initiatives in the Housing White Paper published in February 2017 will be taken forward. The main thrust of the revised NPPF is to provide more housing to meet current high levels of unmet need for housing.

1.2 At the same time, DHCLG published several other documents including:

- National Planning Policy Framework Consultation Proposals (which seeks to explain the main changes)
- Draft Planning Practice Guidance which includes a lengthy section on Viability;
- A consultation on "Supporting housing delivery through developer contributions"
- A Housing Delivery Test Draft Measurement Rule Book
- Government response to the Planning for the Right Homes in the Right Places consultation.

1.3 This report briefly summarises the contents of the draft Revised NPPF and the other consultation documents. It considers some of the possible implications for the planning system as it currently operates and specifically implications for this Council. The report asks Committee to note the NPPF and the other consultation documents. It seeks agreement to a draft recommended response to the consultations.

2. RECOMMENDED ACTION

2.1 That the Committee notes the contents of the Draft Revised NPPF and associated documents published by DCLG in March 2018 and the various proposed changes to the planning system.

2.2 That Committee approves the general thrust of the Council's recommended response to the consultation and other proposals as outlined in Section 4 of this report with the final comments to be agreed by the Head of Planning, Development

3. BACKGROUND AND ISSUES

- 3.1 The long awaited draft Revised National Planning Policy Framework (NPPF) was published by the Department for Housing Communities and Local Government (DHCLG) on 9th March 2018, along with a number of associated documents. These documents follow on from the White Paper on Housing which was presented to Parliament in 2016. The White Paper set out how the Government intends that more housing is provided in the future under the title "Fixing Our Broken Housing Market." Planning Applications Committee agreed the Council's consultation response to the White paper in April 2017. Further detail on a number of these reforms was set out in *Planning for the right homes in the right places* in September 2017.
- 3.2 The Draft Revised NPPF is presented as a complete revised document. A separate document, titled "National Planning Policy Framework Consultation proposals," describes the main revisions in the document chapter by chapter. It also sets out 40 consultation questions on which the government is seeking responses. These 40 questions are also provided on a separate form that can be filled in and emailed to DHCLG. Annex 1 contains a copy of this form. It is not proposed that the Council respond on every question, which would take considerable time and resources. However there are a number of aspects of the revised NPPF that are of particular relevance to Reading Borough and the Council proposes to respond in these areas having regard to relevant questions in the consultation.
- 3.3 The other associated documents that were published at the same time as the Draft Revised NPPF have differing consultation processes:
- The consultation on "Supporting housing delivery through developer contributions" sets out 34 formal questions to which consultees are asked to respond. A copy of the draft recommended response is attached at Appendix 2;
 - The Draft Planning Practice Guidance for Viability is assumed to be a consultation document although no formal consultation responses are sought. The Council's brief draft comments on the document are set out in Appendix 3;
 - The Housing Delivery Test Draft Measurement Rule Book is described as a Draft methodology to calculating the Housing Delivery Test but again no formal consultation responses are explicitly sought. The Council's brief draft comments on the document are set out in Appendix 4.
- 3.4 The Draft Revised NPPF:
- makes a number of structural changes, in particular dividing the document into clear chapters;
 - incorporates policy proposals on which the Government has previously consulted;
 - incorporates additional proposals on which this document is consulting.

There are a significant number of changes to the current NPPF. The more significant changes are set out below.

- 3.5 **Achieving sustainable development:** The wording of the presumption in favour of sustainable development (paragraph 11) has been reordered to reflect the way that plan and decision-making are approached in practice. The draft text also sets out an expectation for objectively assessed needs to be accommodated unless there are strong reasons not to, including any unmet needs from neighbouring areas.

- 3.6 **Assessing housing need:** paragraph 61 requires that strategic plans should be based on the local housing need assessment and any needs that cannot be met within neighbouring areas should be taken into account when establishing this figure. The quantum of development needing to be accommodated would be established through a new requirement to produce statements of common ground between neighbouring councils.

In terms of decision-making, the new text states that, if there is no development plan or the relevant policies are out of date, permission should be granted unless the site is on a defined list of protected assets. The NPPF puts forward such a list of assets which includes green belt, ecological designations, ancient woodland and aged or veteran trees.

- 3.7 **Viability:** Paragraph 173 in the original, which aims to ensure viability and deliverability, has been replaced by new paragraph 58. It now states:

“Where proposals for development accord with all the relevant policies in an up-to-date development plan, no viability assessment should be required to accompany the application. Where a viability assessment is needed, it should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.”

In addition, paragraph 34 notes that the local plan must set out where further viability assessments might be required at the planning application stage. DHCLG has also produced separate Draft Planning Practice Guidance for Viability which is considered in more detail below.

- 3.8 **Delivering a sufficient supply of homes:** This new chapter brings forward a number of initiatives from MHCLG, which have been consulted on over the last three years. It references a standard methodology for assessing housing numbers set out in planning practice guidance. The methodology consulted on before Christmas was designed to be simpler than currently exists, which will help remove long protracted delays at Examination and speed up the plan making process, which needs to happen in order to bring certainty to the market in the shorter term. The methodology is still to be finalised. There is also a requirement for plan policies to address the housing requirements of groups with particular need - students and people who rent their homes. Another point refers to local authorities taking a flexible approach to applying policies or guidance relating to daylight and sunlight, where this would otherwise inhibit making efficient use of a site for housing.

- 3.9 **Housing delivery test:** The Secretary of State has stated the one of the biggest shifts" in the new approach is, "a change in culture, towards outcomes achieved - the number of homes delivered- rather than on processes like planning permissions". As a consequence, the draft NPPF introduces a Housing Delivery Test. This will measure net additional dwellings provided in a local authority against the homes required, using national statistics and local authority data. The Secretary of State will publish Housing Delivery Test results every November. As noted, the government has published a separate document which sets out a detailed rulebook for measurements against the delivery test.

The housing delivery test, which aims to assess actual home completions - measured using official figures for net additional dwellings over a three-year period - against councils' housing requirements. From 2020, if an authority's delivery rate falls below 75 per cent of its housing requirement, a presumption in favour of sustainable development kicks in and planning applications will then be judged against the NPPF rather than the local plan. DHCLG has also produced a separate Housing Delivery Test Draft Measurement Rule Book to explain this test in more detail.

- 3.10 Paragraph 78 provides that authorities should consider imposing a planning condition to bring forward development within two years. It also encourages local planning authorities to consider why major sites have not been built out when considering subsequent planning applications.

- 3.11 There are a number of proposed changes for **plan making** which include:
- A new plan-making framework which allows authorities to define and plan for strategic priorities possibly by local planning authorities working together;
 - A requirement for authorities to review plan policies every 5 years following the date of adoption;
 - A new requirement to prepare and maintain a Statement of Common Ground, as evidence of the duty to cooperate;
 - A number of changes to the tests of 'soundness' - including strengthening the 'effective' test to emphasise effective joint working, as evidenced by the Statement of Common Ground;
 - Tightening the evidence which is expected to support a 'sound' plan, to allow for a more proportionate approach.
- 3.12 **Affordable housing:** The definition of affordable housing has been widened in Annexe 2 of the NPPF. The requirement to provide for starter homes is now included, and the new policy now expects a minimum of 10% for affordable home ownership across the board (not specifically starter homes). This will include shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of intermediate rent). It also includes for discounted market sales housing that is sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. Paragraphs 63 and 64 incorporate the Ministerial Statement of 14th November 2014 on affordable housing contributions restricting authorities from seeking such housing on sites of 10 or less dwellings.
- 3.13 **Densification around transport hubs:** The draft seeks a significant uplift in prevailing densities, unless this would be inappropriate. Local planning authorities should refuse applications which they consider fail to make effective use of land, in areas where there is an existing or anticipated shortage of land for meeting identified housing needs. The draft also includes a policy to make it easier to convert retail and employment land to housing where this would be a more effective use and proposes a policy for making more effective use of empty space above shops and in other situations where land and buildings could be used more effectively. A future consultation is promised to seek views on a possible permitted development right for upwards extensions to create new homes.
- 3.14 The **sequential approach to town centre uses** is amended to make clear that out-of-centre sites should be considered only if suitable town centre or edge-of-centre sites are unavailable or not expected to become available within a reasonable period. The draft says such sites do not have to be available immediately, in order to avoid prejudicing town centre or edge of centre sites that are in the pipeline. It removes the expectation that office developments over a certain floorspace threshold outside town centres are subject to an impact assessment.
- 3.15 On transport proposed changes include:
- New wording on the variety of ways in which transport should be considered as part of the planning process;
 - That policies on parking standards should now also take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles;
 - A new policy that maximum parking standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network.
- 3.16 **Air quality:** Paragraph 179 suggests that planners should take into account the "presence of Air Quality Management Areas and Clean Air Zones". "Opportunities to improve air

quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement." As far as possible, opportunities should be considered at the plan-making stage.

- 3.17 **Green Belt/brownfield:** The draft NPPF maintains strong protections for green belt land. Planning authorities must fully examine "all other reasonable options" for meeting their identified development needs before releasing green belt.
- 3.18 Measures towards achieving higher levels of delivery of housing are the subject of the major changes in the draft Revised NPPF. However, there are a number of other proposed changes:
- Changes to local plan-making including to the tests of soundness;
 - References to promoting social interaction and healthy lifestyles through planning;
 - Promoting sustainable transport including a tightening of policy to link sustainable transport with opportunities to increase densification;
 - Increased emphasis on achieving well designed places including referencing the use of design codes and specific standards such as Building For Life.
 - That great weight should be given to the conservation of a heritage asset irrespective of whether the potential harm to its significance amounts to 'less than substantial harm' or 'substantial harm or total loss' of significance .
- 3.19 The Government's new **Draft Planning Practice Guidance for Viability** sets out the Government's recommended approach to viability assessment for planning in relation to viability for policy making and for decisions. The new draft policy guidance expects all viability assessments to reflect a recommended approach to be set in revised national planning guidance and says all viability assessments should be made publicly available. The guidance says plans can set out when and how review mechanisms may be used to amend developer contributions to help account for significant changes in costs and values, and how any significant increase in overall value should be apportioned between the local authority and the developer.
- 3.20 The guidance indicates that the role for viability assessment is primarily at the plan making stage. Plans should be informed by evidence of infrastructure and affordable housing need and an assessment of viability that takes into account all relevant policies, local, and national standards including for developer contributions. Viability assessment should not compromise the quality of development but should ensure that policies are realistic and the total cumulative cost of all relevant policies is not of a scale that that will make development unviable.
- 3.21 The guidance indicates that it is important to consider the specific circumstances of strategic sites within the plan, perhaps through individual site specific viability assessments.
- 3.22 The guidance indicates how values and costs should be calculated. This is standard advice and relates to standard methodologies. The major area of new clarification in the guidance is how land value is to be defined for the purpose of viability assessment. The new draft guidance recommends that the 'existing use value plus' (EUV+) method is used to calculate benchmark land value at the stage when the local authority sets its local plan policies. As part of this calculation, a premium for the landowner will be calculated, and separately, a suitable return for the developer will be calculated. However, the clear recommendation that EUV+ should be used the main basis for calculating the benchmark land value is a significant step.
- 3.23 EUV is the value of the land in its existing use together with the right to implement any development for which there are extant planning consents. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the

type of site and development types. There are other factors that will be taken into account in determining the benchmark land value but EUV is proposed as the starting point.

3.24 Even more significant is the government recommendation that “land value should fully reflect the total cost of all relevant policy requirements including planning obligations and, where applicable, any Community Infrastructure Levy charge.” This means that land values should account for all policy requirements including requirements for affordable housing. Too often developers have ignored policy requirements in an assumption that viability is the be all in determining what is provided as part of a development. The guidance still allows land values to be informed by comparable market evidence of current uses, costs and values wherever possible. However, it states that “Where recent market transactions are used to inform the assessment of benchmark land value there should be evidence that these transactions were based on policy compliant development. This is so that previous prices based on non-policy compliant developments are not used to inflate values over time.” The guidance sets out:

- How should Existing Use Value be established for viability assessment?
- How should the premium to the landowner be defined for viability assessment?

The guidance re-affirms that the premium to the landowner has to take account of the policy compliant land value.

3.25 The draft guidance sets out that an assumption will be made that the return to the developer “may be 20% of GDV” for the purposes of plan making, in order to establish viability of the development plan policies. A lower figure of 6% of GDV “may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces the risk”. And it is also acknowledged that different figures may be appropriate for different development types, for example build to rent.

3.26 The draft guidance provides policy guidance on the use of review mechanisms. “For large or multi-phased development, review mechanisms can be used to capture increases in scheme value that occur over the lifetime of a development.” It indicates that plans should set out how any significant increase in the overall value of a large or multi-phased development will be apportioned between the local authority and the developer.

3.27 The guidance allows for different circumstances such as for the build for rent product where the economics are different to building for sale. The guidance indicates that any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances. The government intends to produce a standard executive summary template for such appraisals with a view that this is published as part of the application process. There is also guidance on how local authorities should monitor and report infrastructure and other provision in Section 106 agreements to better promote accountability. The proposals also require developers to provide open book viability assessments in order to improve transparency and accountability.

3.28 The DHCLG publication, “**Supporting housing delivery through developer contributions**” indicates that, “...it is clear that the current system of developer contributions is not working as well as it should. It is too complex and uncertain. This acts as a barrier to new entrants and allows developers to negotiate down the affordable housing and infrastructure they agreed to provide.” The document sets out the key objectives that the Government is seeking to achieve to make the system of developer contributions more transparent and accountable by:

- Reducing complexity and increasing certainty;
- Supporting swifter development;

- Increasing market responsiveness;
- Improving transparency and increasing accountability;
- Allowing the introduction of a Strategic Infrastructure Tariff to help fund or mitigate strategic infrastructure, ensuring existing and new communities can benefit.

3.29 The consultation document proposes a series of measures:

- streamline the process to set or revise a CIL charging schedule by removing the need for 2 separate consultations and linking the process up with the local plan process;
- Lifting the section 106 pooling restriction for authorities that have adopted CIL or for those authorities where house prices are low, meaning that CIL cannot be feasibly charged or where development is planned on several strategic sites and there is a need for combined pooling of infrastructure.
- Further refinements to the operation and administration of the CIL charge;
- Allow CIL charging schedules to be set based on the existing use of land with simplified charging for complex sites;
- Indexing residential development to regional or local authority house prices instead of to national figures so that changes are more responsive to local market conditions;
- There are also proposals for more detailed reporting of CIL income and spending through a requirement for the publication of Infrastructure Funding Statements.
- In the light of the success of Mayoral CIL in London which is being used to fund the building of the Queen Elisabeth Line/Crossrail, the Government proposes to allow combined authorities and joint committees, where they have strategic planning powers, to introduce a Strategic Infrastructure Tariff.

At Annex 1 to the document, DHCLG has set out a total of 34 questions on which it is seeking answers.

4.0 COMMENTARY / CONSULTATION

- 4.1 A separate document, titled "National Planning Policy Framework Consultation proposals," describes the main revisions in the document chapter by chapter. It also sets out 40 consultation questions on which the government is seeking responses. These 40 questions are also provided on a separate form that can be filled in and emailed to DHCLG. Annex 1 contains a copy of this form. It is not proposed that the Council respond on every question, which would take considerable time and resources. However there are a number of aspects of the Draft Revised NPPF that are of particular relevance to Reading Borough and it is proposed the Council responds in these areas having regard to relevant questions in the consultation.
- 4.2 The Draft Revised NPPF largely consolidates various measures that have previously been the subject of consultation. As expected the draft Revised NPPF continues to emphasise the use of brownfield land and densification within urban areas. Other changes propose various refinements to the system, with promises to speed things up and clarify processes. There is welcome additional advice on achieving higher design quality and the need for applicants to undertake pre-application discussions.
- 4.3 The main thrust of the revised document is intended to help increase house building rates. The Council has previously commented on the new standard methodology for assessing housing need. The methodology has not yet been finalised, but the Draft NPPF requires provision to be planned on the basis of meeting these identified needs. There are additional measures to strengthen the duty to cooperate through which it is intended that authorities will undertake strategic planning to best meet identified housing needs in an area. However, this is still somewhat inadequate as a means for proper strategic planning or satisfactorily dealing with cross boundary issues.

- 4.4 The draft Revised NPPF will place further pressure on local authorities not only to get their local plans in place but also to ensure that delivery of new housing is taking place as forecast. The requirement for a minimum 5 year housing land supply has been refined and will continue to facilitate considerable unplanned development solely on the basis that insufficient housing land exists at a particular point in time. Added to this is the new Housing Delivery Test which will add a further presumption in favour of housing development where delivery falls significantly below delivery targets.
- 4.5 A significant concern for the Council will be the widening of the definition of affordable housing to include various intermediate and discounted sale products (these include starter homes, discounted market sales housing such as shared ownership and other low cost/discounted homes for sale products sold at a discount of at least 20% below local market value). It also includes reference to Affordable Private Rent for Build to Rent Schemes. These changes will inevitably have an adverse impact, potentially diluting the provision of affordable rental accommodation for those least able to afford housing in the current market (i.e. those who need social rented or affordable rent housing). The government may want to offer more low cost home ownership routes but this should not be at the expense of affordable rental provision. It also has impacts on assessing viability in local plans which is discussed in more detail below.
- 4.6 The Council should object to new Paragraphs 63 and 64 which incorporate the ministerial Statement of 14th November 2014 on affordable housing contributions. Reading Borough Council, along with West Berkshire Council, challenged this statement in the High Court. The High Court clearly came to the conclusion that this was not good policy and that its stated purpose was not justified by the evidence. It was subsequently upheld in the Court of Appeal. However, the Court of Appeal decision did not alter that conclusion of the High Court that it was not good policy and we should continue to press that this policy is severely flawed and inhibits the provision of much needed and viable affordable housing.
- 4.7 The Council previously raised concerns that continued restrictions on the release of green belt land is a serious barrier to development of low grade land for much needed housing in highly sustainable locations close to existing urban centres. However, the NPPF largely maintains the existing presumption against development in the Green Belt unless there are exceptional circumstances.
- 4.8 Officers have concerns that the general statement about taking a flexible approach to applying policies or guidance relating to daylight and sunlight will lead to very poor, high density developments where inadequate levels of daylight and sunlight provide unsatisfactory living conditions and have implications for the health of those living in them.
- 4.9 The new guidance and the associated draft methodology for calculating viability fill an obvious current vacuum in policy advice and, for the most part, will be a significant improvement over the current situation. There is no doubt that the current lack of policy guidance on how to calculate viability has enabled the development industry to reduce affordable housing provision mainly by inflating the appropriate land value through the use of benchmark values (i.e. arguing that the value of a site should be based solely on market transaction prices for other similar sites). Local authorities have long argued that land values should be based on existing use values and policy compliance. The new guidance moves very much in that direction with its reference to EUV plus (Existing Use Value with an uplift to persuade a landowner to sell) and to benchmark values based on policy compliant provision. The new guidance is, therefore, generally to be welcomed. However, EUV plus needs to be more tightly defined, in particular on how to calculate the 'plus' part of the equation. The guidance also firmly indicates that an assumption of a 20% profit level on sale housing for developers is appropriate. Our experience is that this can be negotiated downwards and we would argue for a more fluid profit level assumption related to whether a scheme is policy compliant.

4.10 Committee is asked to note the commentary on the NPPF and associated DHCLG consultation documents within this report and to agree that a draft response be prepared on the basis of the matters referred to in this section in relation to selected questions in the Consultations. The full list of questions on the NPPF consultation is set out in Appendix 1. Commentary will be formulated in relation to the other consultations on viability, the Housing Delivery Test and Developer Contributions, as appropriate. The final response will be agreed by the Head of Planning, Development and Regulatory Services in consultation with the Lead Councillor for Strategic Environment, Planning and Transport. Members should note that the closing date for consultation responses is 10th May 2018. Committee should also note that there are on-going discussions with the other Berkshire Authorities about submitting joint representations on the draft guidance on Housing Delivery Tests and associated matters.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The Planning Service contributes to the Council's strategic aims in terms of:

- Seeking to meet the 2018 Corporate Plan objectives for "Keeping the town clean, safe, green and active."
- Seeking to meet the 2018 Corporate Plan objectives for "Providing homes for those in most need."
- Seeking to meet the 2018 Corporate Plan objectives for "Providing infrastructure to support the economy."

6. COMMUNITY ENGAGEMENT AND INFORMATION

6.1 Only minor reference is made to these matters in the changes proposed.

7 EQUALITY IMPACT ASSESSMENT

7.1 Where appropriate the Council must have regard to its duties under the Equality Act 2010, Section 149, to have due regard to the need to—

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.2 There are no direct implications arising from the proposals.

8. LEGAL IMPLICATIONS

8.1 These are dealt with in the Report.

9. FINANCIAL IMPLICATIONS

9.1 There are no direct financial implications resulting from this report.

10. BACKGROUND PAPERS

The following papers referred to in the report were published by DHCLG on their website in March 2018.

[National Planning Policy Framework: draft text for consultation](#)

[National Planning Policy Framework: consultation proposals](#)

[Draft planning practice guidance](#)

Sets out our proposed changes to the NPPG arising from the changes to the NPPF including viability.

[Housing Delivery Test: draft measurement rule book](#)

[Supporting housing delivery through developer contributions](#)

Consultation response form

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

Your details

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

Organisational response

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

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

If you selected other, please state the type of organisation

Please provide the name of the organisation (if applicable)

Chapter 1: Introduction

Question 1

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

[Click here to enter text.](#)

Chapter 2: Achieving sustainable development

Question 2

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 3

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 4

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

[Click here to enter text.](#)

Chapter 3: Plan-making

Question 5

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 6

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

[Click here to enter text.](#)

Chapter 4: Decision-making

Question 7

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 8

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

Please select an item from this drop down menu

Please enter your comments here:

[Click here to enter text.](#)

Question 9

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

Please enter your comments below

[Click here to enter text.](#)

Question 10

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

[Click here to enter text.](#)

Chapter 5: Delivering a wide choice of high quality homes

Question 11

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

Please enter your comments here

[Click here to enter text.](#)

Question 12

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 13

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 14

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

[Click here to enter text.](#)

Chapter 6: Building a strong, competitive economy

Question 15

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 16

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

[Click here to enter text.](#)

Chapter 7: Ensuring the vitality of town centres

Question 17

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 18

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

[Click here to enter text.](#)

Chapter 8: Promoting healthy and safe communities

Question 19

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

[Click here to enter text.](#)

Question 20

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

[Click here to enter text.](#)

Chapter 9: Promoting sustainable transport

Question 21

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Question 22

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Question 23

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

Click here to enter text.

Chapter 10: Supporting high quality communications

Question 24

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

Click here to enter text.

Chapter 11: Making effective use of land

Question 25

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Question 26

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Question 27

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

Click here to enter text.

Chapter 12 : Achieving well-designed places

Question 28

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

Click here to enter text.

Question 29

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

Click here to enter text.

Chapter 13: Protecting the Green Belt

Question 30

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Question 31

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

Click here to enter text.

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

Question 32

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

[Click here to enter text.](#)

Question 33

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

Please select an item from this drop down menu

[Click here to enter text.](#)

Chapter 15: Conserving and enhancing the natural environment

Question 34

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 35

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

[Click here to enter text.](#)

Chapter 16: Conserving and enhancing the historic environment

Question 36

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

[Click here to enter text.](#)

Chapter 17: Facilitating the sustainable use of minerals

Question 37

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

[Click here to enter text.](#)

Question 38

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 39

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

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Transitional arrangements and consequential changes

Question 40

Do you agree with the proposed transitional arrangements?

Please select an item from this drop down menu

Please enter your comments here

[Click here to enter text.](#)

Question 41

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Question 42

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

Please select an item from this drop down menu

Please enter your comments here

Click here to enter text.

Glossary

Question 43

Do you have any comments on the glossary?

Click here to enter text.