

Planning Applications Committee

29 April 2026



Reading
Borough Council
Working better with you

Title	Responses to National Planning Consultations
Purpose of the report	To make a decision
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director Economic Growth and Neighbourhood Services
Report author	Mark Worringham, Planning Policy Manager / Acting Development Manager (Planning & Building Control)
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Council priority	Secure Reading's economic & cultural success
Recommendations	<ol style="list-style-type: none">1. To note the response that has been submitted to the National Planning Policy Framework consultation.2. To note that a response will be submitted on the consultation on planning committee reform.3. To agree that a response be submitted to the consultation on consulting the Secretary of State based on the points in paragraph 5.5 of this report.4. To agree that a response be submitted to the consultation on fees for planning applications based on the points in paragraph 6.5 of this report.

1. Executive summary

1.1 This report highlights a number of national planning consultations which are currently open or have already closed. It deals with the following consultations:

- A revised National Planning Policy Framework and related matters
- Planning committee reform
- Consulting the Secretary of State on planning decisions
- Fees for planning applications.

2. Background

2.1 Addressing the Planning system is among the key priorities of national government. This has meant that there have been a substantial number of changes made and proposed to how Planning functions over recent years.

2.2 On 16 December 2025, a revised National Planning Policy Framework (NPPF) was published for consultation alongside some other questions around planning reform, in particular the approach to data centres and on site energy generation, greater consistency in inputs to viability assessment and setting a 'medium' category of development with a proposed range of 10-49 dwellings on sites with an area up to 2.5 hectares. The consultation ran to 10 March 2026. It is available to view on the MHCLG website¹.

¹ [National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK](#)

2.3 In addition, between 23-26 March a number of additional consultations were published relating to the planning system, as follows:

- Consulting the Secretary of State on planning decisions (closes 4 May)²
- Fees for planning applications (closes 18 May)³
- Planning committee reform: draft regulations and guidance (closes 23 April)⁴

2.4 Each of these is dealt with in turn below.

3. National Planning Policy Framework

3.1 The NPPF is the comprehensive statement of national planning policy, and was last updated in December 2024. A new version was published for consultation that was substantially different from the existing version. The main objectives for this new version were as follows:

- Ensure national planning policy is accessible and understandable for everyone who uses it;
- Establish a comprehensive suite of national policies on general planning matters to avoid these matters being repeated or deviated from in locally-produced plans; and
- Make the policy more 'rules-based' and certain, and so more capable of supporting timely and consistent planning.

3.2 The proposed national development management policies were initially intended to be statutory policies with the same status as the development plan in determining applications. However, this has not been taken forward, and the relevant legal provisions not yet brought into force, so as it stands these policies will continue to have the same status as the existing NPPF.

3.3 The consultation was based around more than 200 questions. This presented a significant capacity issue in responding, particularly since it took place at a time when the Council was involved in hearings into the Local Plan Partial Update. These capacity and timing issues therefore did not allow officers to bring a draft response to the consultation to Committee for agreement. A response by officers was therefore submitted by the deadline of 10 March. This response is included as Appendix 1. Only those questions considered to be of relevance to Reading have been answered.

4. Planning committee reform

4.1 In May 2025 a technical consultation was published on proposals to reform planning committees. This consultation included the following proposals:

- Identifying Tier A applications (which must always be delegated to officers) and Tier B applications (which must be delegated unless the Chief Planner and Chair of Committee agree that it should go to Committee based on a gateway test).
- A maximum of 11 committee members
- Mandatory training of committee members, administered at a national level

4.2 The government has now published its response to the 2025 consultation, and is now consulting on draft Regulations (which would be referred to as The Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026) and accompanying guidance. The key elements of the draft Regulation to note are as follows:

- That Schedule 1 of the draft Regulations specifies types of application that would always be delegated to officers (previously referred to as Tier A) which are as follows:
 - Minor commercial or residential applications
 - Householder applications
 - Applications for permission in principle
 - Non-material amendments
 - Modification or discharge of planning obligations in connection with a Schedule 1 development

² [Consulting the Secretary of State on planning decisions - GOV.UK](#)

³ [Fees for planning applications - GOV.UK](#)

⁴ [Planning committee reform: draft regulations and guidance - GOV.UK](#)

- Certificates of appropriate alternative development (for the purposes of assessing compensation for compulsory purchase)
- Certificates of lawfulness
- Biodiversity gain plans
- Reserved matters applications other than for phased development
- Applications for discharge of planning conditions
- Applications for prior approval
- That Schedule 2 of the draft Regulations lists types of applications that may be considered by either an officer or by the planning committee as follows:
 - An application for planning permission that is not a householder, minor residential or minor commercial application
 - Listed building consents or variation or discharge of conditions on LBCs
 - Applications for planning permission associated with a LBC
 - Variation or removal of conditions
 - Retrospective planning applications
 - Modification or discharge of planning obligations in connection with a Schedule 1 development
 - Reserved matters applications for phased development
 - Applications for express consent to display advertisements
 - Works to protected trees
- The decision on whether Schedule 2 applications are referred to committee is made by a nominated member and nominated officer depending on whether the proposal raises:
 - one or more issues of economic, social or environmental significance to the local area, or
 - one or more significant planning matters having regard to the development plan and any other material considerations.
- Planning functions not listed in either Schedule would be down to the authority's constitution to determine whether it would be referred to committee.
- That applications by and on behalf of 'linked persons' (i.e. the authority, an officer or member of the authority or an entity wholly or partly owned or controlled by the authority) may be referred to committee.
- That planning committees be limited to 13 members (an increase from the previous consultation).

4.3 Of these elements, those with the greatest significance for PAC would be that, firstly, there would no longer be an ability for an application within Schedule 1 to be called into Committee (unless it was by a linked person), and, secondly, that certain application such as reserved matters (unless it was part of a phased application, which are rare in Reading) would no longer come to Committee. This would restrict democratic oversight of development. In addition to this it is also not clear why some types of application appear in one schedule rather than the other. For instance, as the Regulations are currently drafted, it would not be possible for a minor application to come to committee yet it would remain possible for a variation of the conditions on a resulting minor permission to be referred to committee.

4.4 In terms of the limit of 13 members, the Council already complies with this requirement and this should not present any particular concerns.

4.5 The Regulations are accompanied by guidance. This guidance states that the nominated officer should be the Chief Planning Officer and the nominated member should be the Chair of Committee. It also states that the "overwhelming presumption" is that Schedule 2 planning functions will also be delegated to officers. It also states that, where the nominated officer and member do not agree on whether a Schedule 2 application should be referred to committee it should be delegated to officers. Furthermore, it states that applications which comply with a detailed site allocation are unlikely to fulfil the tests for referral to committee.

4.6 The deadline for submission of responses is 23 April, before the Committee meeting. Officers have not yet formalised a response at the time of writing. The headlines of a response will be agreed with the Chair, Vice Chair and Lead Councillor for Planning prior to its submission by the deadline and the full response will be reported to this meeting as an update.

5. Consulting the Secretary of State

- 5.1 There are already requirements in place for LPAs to consult the Secretary of State to where they are minded to approve certain types of application, which include inappropriate development in the Green Belt and development in an area at risk of flooding where the Environment Agency has objected. This consultation proposes introducing additional requirements for LPAs to consult the Secretary of State, as follows:
- Where a LPA is minded to refuse an application for commercial development with a floorspace of 15,000 sq m or more.
 - Where a LPA is minded to refuse an application relating to nuclear facilities
 - Where a LPA is minded to grant permission for an application for one or more dwellings within the Detailed Emergency Planning Zones (DEPZs) of AWE Aldermaston and Burghfield where the Office for Nuclear Regulation (ONR) and/or an Emergency Planning team has objected.
- 5.2 In terms of the commercial development proposal, 15,000 sq m is a significant amount of floorspace and has been set as the threshold for what is considered 'strategic'. However, such proposals will continue to come forward in Reading, as a significant town centre office building is likely to exceed this threshold for instance.
- 5.3 There are unlikely to be any applications relating to nuclear facilities in Reading.
- 5.4 The approach to the DEPZs of the two AWE sites affects only four authorities, of which Reading is one. The DEPZ for AWE Burghfield extends into Reading and covers the land west of the A33 and south of the Kennet & Avon Canal, including Green Park. It is likely that any residential development in this area would attract an objection from the ONR and both Reading and West Berkshire's emergency planners, as it would be likely to be incapable of being accommodated within the Off-Site Emergency Plan. Effectively this is likely to mean that there is no realistic route to further residential development in this area, but this was already likely to be extremely difficult with ONR and emergency planning responses likely to carry significant weight. The updates to the Local Plan do not envisage further residential development in this area.
- 5.5 The deadline for a response is 4 May. Officers have not yet had a chance to formally draft a response, but it is proposed that a response be drafted which:
- Considers that the 15,000 sq m threshold for commercial development is too low as a development of this scale remains of principally local rather than strategic significance, and that a threshold of 50,000 sq m better reflects genuine strategic significance;
 - Raises no objection to the proposals around nuclear development;
 - Cautiously accepts the rationale regarding development in the DEPZs for AWE but makes clear that this strategic constraint needs to be factored into setting housing targets for affected local planning authorities, as it can rule out significant proportions of the relevant authorities for residential development.
- 5.6 It should be noted that there is also a proposal for requiring consultation with the Secretary of State for an application for 150 or more homes which an LPA is minded to refuse. This is not part of the current consultation, and there is no ongoing consultation on this matter.

6. Fees for planning applications

- 6.1 A consultation has been published on a National Default Fee Schedule. This relates to the ability within the Planning and Infrastructure Act 2025 for local planning authorities to set their own fees. Where local fees are not set, there will be national default fees, and this is the subject of the consultation.
- 6.2 Based on survey work it was determined that no planning fee fully covers the costs of determination, with the shortfall ranging from 18% to 60%, with applications to vary or remove conditions and outline applications particularly underpriced. The proposed Schedule therefore proposes a level set at 90% of the assessed costs of determining an application.
- 6.3 The consultation includes the proposed Schedule in full which compares the proposed default fee to the current fee. This is in Annex A of the [consultation](#) and has not been reproduced here in full due to its length. It shows that fees would increase across the board. The most significant increase

for common types of application is for variation of condition for major applications, which would see a 52% increase. Certain types of application, such as listed building consents and works to protected trees would remain free.

6.4 The consultation also includes guidance around the basis for local fee setting. Much of this guidance is relatively straightforward, but it does prevent LPAs from using planning fees to fund other parts of the planning service (e.g. policy and enforcement) and also prevents LPAs from setting fees for those free applications referred to above.

6.5 The deadline for a response is 18 May. Officers have not yet had a chance to formally draft a response, and in any case we do not have a clear evidential basis to dispute the specific fees set, but it is proposed that a response be drafted which:

- Welcomes the proposed increase in planning fees, particularly for removal/variation of conditions and outline applications;
- Raises concerns that the fees for prior approval that result in residential development remain well short of the costs of determining such applications;
- Broadly welcomes the guidance around local fee setting, but raises concerns that statutory planning functions such as plan-making cannot be considered in local fee setting (as initially proposed) as there are few other sources of funding for this function other than central budgets.

6.6 The response in full will be brought to this meeting as an update report.

7. Contribution to strategic aims

7.1 The Council Plan (2025-2028) identifies five priorities for the Council over the next three years. These are:

- Promote more equal communities in Reading
- Secure Reading's economic and cultural success
- Deliver a sustainable and healthy environment and reduce Reading's carbon footprint
- Safeguard and support the health and wellbeing of Reading's adults and children
- Ensure Reading Borough Council is fit for the future.

7.2 The planning service contributes to securing Reading's economic and cultural success, delivers sustainable development and healthy environments, including reducing the carbon footprint through application of our policies and national regulations on energy efficient buildings.

8. Community engagement

8.1 The issues identified in relation to planning committees do not directly affect community engagement, but do have potential to reduce democratic accountability through restrictions on which applications can be determined by committee.

9. Equality impact assessment

9.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, 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.

9.2 The consultations referred to in this report include questions relating to the Public Sector Equality duty, but there are no proposed responses that identify particular issues.

10. Environmental and climate implications

10.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers). The Planning and Building Control functions are essential in helping to address the Climate

Emergency through ensuring that development is undertaken to the highest possible environmental standards in line with national regulations and local policies.

- 10.2 The draft NPPF included a number of policies relating to the environment and climate. The submitted responses in Appendix 1 highlight important issues where relevant.

11. Legal implications

- 11.1 The NPPF represents national policy and is a material consideration in determining planning applications, but the development plan remains the primary consideration under the Town and Country Planning Act 1990 and Planning and Compulsory Purchase Act 2004.
- 11.2 The proposals relating to planning committees form draft Regulations.
- 11.3 The consultations on planning fees and consultation with the Secretary of State will ultimately require legislation to be drafted to bring into force.

12. Financial Implications

- 12.1 Responses to national consultations are funded from existing budgets.
- 12.2 The restrictions on the role of committees would potentially result in some savings through reduced frequency, length and reporting requirements. These have not been quantified.
- 12.3 The proposed increase in national default planning fees would be expected to result in an increase in planning application fee income to better reflect the cost of determining applications. Depending on the type of application, the increases vary from 5 to 25% for the most common types of application. Although full calculations have not been carried out, and the increases may deter some applications, it is reasonable to anticipate an approximately 10% increase in income, which would be in the range of £50-100K per annum.

13. Appendices

Appendix 1: Response to National Planning Policy Framework

Appendix 1: Response to National Planning Policy Framework

The following responses and opinions are those of officers of the Borough Council.

- 1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?**

LPA response: These should be based on a National Spatial Strategy to direct the right development to the right places so that limited land resources are used most effectively in the public/national interest. Any associated NDMP should be based on the existing NPPF. Imposed national policies should focus on national/regional matters, leaving local scale matters to local authorities.

- 2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?**

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

LPA response: A more clearly arranged set of policies may assist with clarity, but appears largely cosmetic and still lacks the spatial approach referred to above.

- 3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?**

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

LPA Response: Disagree with Annexe 1 (2)“2. *Development plan policies which are in any way inconsistent with the national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework.*”

Undermines development plan policies adopted under the 2024 Framework in good faith and in accordance with the plan-led system set out in statute. Will simply result in greater uncertainty for developers and an increase in Planning-by-appeal.

Annexe 1(5) – Agree with spatial strategies, but that these are also needed at national and regional level to be useful. Identifying genuine growth points.

Annexe C – seems overly specific in some cases whilst missing key matters in others. E.g. too detailed on telecoms whilst failing to mention practical matters related to trees (tree survey/method statement) etc. Best left to local authorities to set out local requirements.

- 4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree**

LPA Response: Agree that national policy should require all authorities to consider the matter and set out main principles. Key issue remains the need for regional/national spatial strategy to identify the required/best locations. Possible use of Crown Land and central government-owned sites. Agree that it should be part of the main document rather than a separate document.

- 5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?**

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree a) Please provide your reasons, particularly if you disagree

LPA Response: Agree that clarity of wording is essential. However please see above in terms of potential conflict between Development Plan and NPPF. Should avoid short-circuiting the preparation of the Development Plan (which must accord with the NPPF at the time of preparation) but which then becomes the primary decision-making document once adopted.

Paragraph 1 calls the NPPF a “material consideration of critical importance” which is not only unclear but it doesn’t seem to be consistent with simplifying the terminology down to ‘substantial weight’. Suggest this should just say “It is of critical importance in both contexts” to avoid confusion, as paragraph 3 deals with material considerations anyway.

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. 20 a) Please provide your reasons, particularly if you disagree

LPA Response: Agree with SDS for each LPA to the extent to which they will apply. PM1(1) refers to a sub-regional scale. The SDS will only be useful to their full extent if set within an over-arching regional-scale strategies informed by a national-scale spatial strategy.

One of the roles is setting out broad locations for nature conservation, but we would note that the boundaries of Local Nature Recovery Strategies and anticipated SDS geographies do not currently line up, and there would need to be some rationalisation or clarification of the roles of these different documents.

7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Partly disagree. As spatial development strategies are intended to be primarily a framework for investment and growth it is not agreed that they should automatically be amended every 5 years (which would be the case as proposed, as there will always be at least some change in housing requirements over a 5 year period) because this will not maximise the certainty that an SDS can provide for investment. Instead, they should be amended in response to significant changes in housing need as set out in point a), with this ideally expressed as a percentage variation.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area’s local housing need? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. If there has not been a significant change in local housing need, it would be appropriate for plan-making (including five year supply) to continue to be on the basis of housing need within the SDS. There would need to be guidance on what ‘significant’ means in this instance, because otherwise it will end up being the subject of considerable debate at appeal.

9) Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Whilst the broad scope of matters to include in local plans is accepted, the adoption of local plans within 30 months remains highly ambitious, and sufficient changes to the process to enable this to happen in most cases have not been made. Adoption is also not entirely within the control of the local planning authority as it is dependent on the time taken for an Inspector's report.

We are also concerned that adoption of an SDS should immediately result in the need to commence a new plan, even if a new plan has recently been adopted. This is likely to result in authorities delaying plan production until after an SDS has been adopted to avoid abortive work, and will also result in plan-making timetables in a single SDS area being co-ordinated, which will have benefits such as the ability to assemble joint evidence but will also have risks in terms of Inspector resource.

10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

LPA Response: Yes

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Partly agree.

It is agreed that local policies should not seek to duplicate national decision-making policies. However, it is not clear whether the restriction on modifying the content of those policies would prevent a local planning authority from identifying requirements that are in addition to the content of national policies. If so, this would require clarification. We consider that local planning authorities should be able to respond to local circumstances through additional policy content in addition to national policies.

It is not clear what the required data standards in point f relate to. This will need to be the subject of further policy or legislation.

12) Do you agree with the approach to initiating plan-making in PM7? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Partly agree. Our concerns with 30 month timescales are set out in relation to question 9, but we would emphasise that it would be difficult to set out realistic milestones as required by point 1. a. when the overall required timescale itself is unlikely to be realistic in the majority of cases.

We do not agree that every element of the plan should be subject to consultation and examination even if it is not proposed to be amended in any way. As long as a local planning authority has demonstrated that a policy is up-to-date, there should be no need to expend further effort and resource on reassessing it every five years.

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree.

The content of PM8 is largely appropriate and will support a proportionate approach to evidence production. In point 3, in addition to information and data, evidence would also need to be based on up-to-date methodologies, particularly if there are changes to how the needs for different types of development are to be assessed. An example would be changes to how travellers are defined in national policy, as has recently occurred.

14) Do you agree with the approach to identifying land for development in PM9? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. PM9 reflects current good practice in identifying land for development in local plans.

15) Do you agree with the policies on maintaining and demonstrating crossboundary cooperation set out in policy PM10 and policy PM11? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree.

The broad content of these policies is supported. However, the requirement to co-operate with infrastructure providers and ensure that local plans align with infrastructure and investment plans of infrastructure providers and authorities only applies to cross-boundary matters. However, plans should align with infrastructure or investment plans as a general principle and this should not only be the case for cross-boundary matters.

16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly disagree. This may change the emphasis but the usual negotiations would remain as the requirements would be set out in policy rather than regulation and viability considerations would remain a feature. Significant uncertainty would remain.

Given that developer contributions need to be linked to the specific impacts of a development and what is necessary to make it acceptable in planning terms, it is not always appropriate to be more specific in the plan, unless there is to be a return to the more tariff-based approach that predated CIL in many authorities.

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Agree that Local Plan should set out circumstances and that this should be supported by national policy.

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree.

We strongly disagree with any proposal to limit local planning authorities' ability to seek local standards relating to the energy efficiency of buildings. This principle would be acceptable if the Future Homes Standard were sufficient to tackle the climate emergency and achieve net zero, but this is not the case. The FHS will represent a 75 - 80% reduction in carbon emissions compared with 2013 standards, but will not eliminate operational emissions as it relies on the complete electrification of the grid (expected by 2035 at the earliest). We are pleased to see that the FHS will effectively phase out fossil-fuel heating, but it will not deliver truly zero carbon homes. This will "lock-in" future energy use and result in the need for costly retrofit. Moreover, the FHS sets a minimum, nationally-defined level of performance that does not account for local net zero targets or fuel poverty. Where an authority can demonstrate that achieving a higher

standard without compromising viability and where it supports local net zero aims, this should be an appropriate measure for local plans to tackle.

We welcome the additional flexibility to be able to set standards above the optional water efficiency standard in areas of serious water stress

Under point c, matters relating to internal layout should not be covered other than for space standards, but accessible or wheelchair homes under M4(2) and M4(3) of the Building Regulations relate in part to internal layout and are considered appropriate matters for a local plan to cover in point b.

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on

LPA Response: Partly agree. We generally support the tests of soundness as identified, which represent an appropriate evolution of those already in place. The 'appropriate' test is a replacement for 'justified' but does not contain the text on being based on proportionate evidence, which was a useful reference that prevented the need to assemble extensive and unnecessary evidence, and we therefore consider that it should be retained.

20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

LPA Response:

Policy PM4 appears to restrict the use of supplementary plans beyond the restrictions that are already in Schedule 7 of the Levelling-Up and Regeneration Act and resulted in Section 15CC of the Planning and Compulsory Purchase Act 2004, in that it restricts site-specific content to unanticipated changes between plan-making cycles and does not include the potential to use supplementary plans for infrastructure and/or affordable housing requirements. We do not agree that these additional restrictions are necessary and appropriate, not least because they may require local plans to contain a significant level of detail which will be difficult to achieve within the 30-month timeframe for production. With the new processes for supplementary plans that include public examination, it is not clear why these additional restrictions are necessary.

Policy PM16 only requires supplementary plans to 'have regard to' national policy rather than to 'be consistent' with it. With supplementary plans becoming part of the development plan, it is not clear why there should be a different standard applied.

21) Do you agree with the principles set out in policy DM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly Disagree – this is more planning procedure rather than planning policy. Agree with a proportionate response and that only the minimum information should be required to make a decision. This actually increases the importance of pre-app for smaller proposals to ensure that the key information is agreed on and not missed prior to submission. Ultimately in the developers' best interests. Also reduces burden on Planning Inspectorate.

22) Do you agree with the policy DM2 on information requirements for planning applications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree – although DM3(F) goes without saying and is therefore of limited usefulness. The question will be who determines whether or not an application "*should clearly be approved*".

23)Do you have any views on whether such a policy could be better implemented through regulations? DM3: Determining Development Proposals

LPA Response: Guidance is probably more helpful and allows a proportionate and flexible approach at local level.

24)Do you agree with the principles set out in DM3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: 1.a - The LPA welcomes a positive and proactive approach. However this relies on the quality of the application submission and a cooperative approach by the applicant. Sometimes a timely decision means refusing the application to avoid abortive work and unnecessary delay to other, more appropriate, proposals. Greater officer involvement in finding solutions is directly linked to increased funding, training and experience.

1.b-f – agree.

25)Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree on the basis that the sentiment of reducing reliance on viability assessment at application stage is welcomed, however points 2 (a-d) simply introduce a new (although not that different from the current situation) set of criteria which developers can claim apply to their proposal. These remain broad and subject to interpretation and would inevitably result in Planning-by-appeal. Also, the current draft wording suggests that developers only need to satisfy one of the four “situations” to justify a viability assessment, which would be too low a threshold.

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

LPA Response: The key issue for this authority is Affordable Housing. Currently viability appraisals are the norm in the majority of applications and not exceptional. Currently the levels of AH achieved fall well below the 30% LP policy requirement which is often undermined on appeal. It is unclear how the revised policy would prevent this situation continuing. A clearer national basic level of Affordable Housing, regardless of viability would provide certainty.

27)Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?

a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.

LPA Response: No. The current system works well and is proportionate.

29)Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: DM6.4 - disagree that national model planning obligations are required. Unnecessarily prescriptive and lacks flexibility and proportionality taking into account local circumstances, including the specifics of each case and the needs of all parties.

Unclear why tests for conditions are in the NPPF but tests for obligations are not.

30)Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: This is already a well-established principle. No further comment.

31)Do you agree with the new intentional unauthorised development policy in policy DM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Agree.

32)Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider? a) If so, are there any particular additions or mitigations which we should consider?

LPA Response: No comment.

33)Do you agree with the new Article 4 direction policy in policy DM10? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: The current one year period for confirming an Article 4 should be reduced – perhaps to 6 months to avoid undesirable outcomes once the intention to serve an Article 4 is publicised.

34)Do you agree with the proposed approach to setting a spatial strategy in development plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. The requirement to identify settlements is not always relevant for an urban authority which constitutes a single settlement, as is the case for Reading, and there is a need for the addition of “where relevant” in point 1. a. of the policy.

35)Do you agree with the proposed definition of settlements in the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree.

36)Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Strongly disagree.

The approach essentially bypasses local policy when considering development proposals within settlements, by only tying adverse effects to national development management policies. This is not in accordance with how the legislation operates in terms of the status of the development plan, and is not appropriate in that it does not allow any consideration of local circumstances. Policy S4 (1) should refer to and give equal weight to the development plan.

In addition the phrase “substantially outweighed” creates unnecessary uncertainty and is open to interpretation and dispute. It will delay matters by pushing cases onto appeal. A plain reading of each policy on its own merits to be weighed in the overall balance by the decision maker is preferable and less confusing. Each policy should be worded appropriately according to the

relative importance of the matters addressed by that policy. Rather than the meaning of policy being distorted by an abstract concept such as the “tilt” suggested.

37)Do you agree to the proposed approach to development within settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree – in particular L2d(3) - development in curtilage. This is appears overly prescriptive and unnecessary and would have undesirable unexpected outcomes.

38)Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly disagree – in particular L2d(3) - development in curtilage. This is appears overly prescriptive and unnecessary and would have undesirable unexpected outcomes.

39)Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons

LPA Response: Neither agree not disagree.

40)Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

LPA Response: Disagree. Railway stations can offer a key strategic sustainable location for housing and mixed use development – as evidenced by many of the stations within Reading Borough. However it is apparent that not all stations will be suitable and this should be a matter to be planned and considered properly through Strategic Development Strategies (and regional and national spatial strategies) to realise all benefits includign rail freight, industry, logistics as well as well-planned housing and associated infrastructure.

41)Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? 36 Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree. a) If not, please provide your reasons

LPA Response: Neither agree not disagree

42)Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Partly agree – These matters should definitely be addressed in Local Plans, supported by the NPPF. Clarity of wording will be key as often these requirements are additional costs on developers and this is a disincentive to comply. Many of these matters should also be supported through a national/regional level strategy – water, power, flood risk, sustainable transport etc.

43)Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration

LPA Response: Partly agree – Should remove the phrase “where relevant to the proposal” as this introduces unnecessary debate and uncertainty.

Agree that Planning is particularly well placed as a discipline to take a holistic view to the many, complex and interrelated requirements involved in mitigating climate change.

44)Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

LPA Response: (See 43 above)

45)Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons

LPA Response: No comment.

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

LPA Response: No comment.

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

LPA Response: Certain aspects would be best achieved through the Building Regulations – especially the performance and specification of buildings.

48)Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. The broad requirements for SDSs is agreed. In our view, national policy should contain greater flexibility for alternative methods of identifying housing need where it can be demonstrated to be a more robust assessment of local need than the standard method.

49)Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what elements should this guidance cover?

LPA Response: Neither agree nor disagree. These matters are generally covered in Planning Practice Guidance and are well understood, but if additional guidance were available it would only be helpful.

50)Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. It is useful to incorporate PPTS within the NPPF, as there does not appear to be a good reason for it to be kept separate.

51)Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what are the key principles this guidance should establish?

LPA Response: Strongly agree. Further guidance on assessing need is required for circumstances such as Reading where there are no existing sites, small numbers of residents in bricks and mortar accommodation and it is difficult to secure any information directly from residents about needs.

52)Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their 42 local plan 5-year housing land supply? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

LPA Response: Strongly agree.

53)Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree.

The Annex states only that the Secretary of State will “seek to” publish HDT results. These results have important implications for decision making, and regular publication will be required to ensure that national policies can be applied in practice. Change “seek to” to “will” and confirm frequency.

54)Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree.

55)Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Not every authority will have opportunities for large scale residential and mixed use development due to the nature of their area, and the policy should therefore use wording such as ‘where appropriate’ to make it clear that this may not always be applicable.

56)Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Neither agree nor disagree.

57)Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: This would be best achieved through Building Regulations. To avoid unnecessary debate and uncertainty at individual application stage. Protection of existing bungalows and other adaptable buildings could be a planning policy.

58)Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, and would you support an alternative minimum percentage requirement?

LPA Response: See above.

59)Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Site allocations will need to be flexible, particularly for specialist housing for older people, as it is our experience that plans for specific sites change and the market may move from provision of general housing to specialist accommodation and vice versa.

60)Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?

LPA Response: Partly agree. It is agreed that plans should set out their tenure expectations for affordable housing in particular, but this will need to be applied to any sites where there is expected to be on-site provision, not just those of 150 homes or more.

61)Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons

LPA Response: Strongly disagree. The sites that are allocated within a constrained authority such as ours are those that are available, whatever size category they fall within. There is not usually a choice of sites that would allow us to select sites on the basis of the size category. In addition, in our experience the size of site is not directly related to the type of developer and whether or not they are an SME, and a site of more than 1 hectare in Reading is a large site of several hundred dwellings that would likely be developed by a larger developer.

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

LPA Response: It is not entirely clear that policy HO7 is necessary, given the presumption in favour of sustainable development in policies S3, S4 and S5 which we consider should be amended to refer to local development plan policy. Local needs should be reflected in the development plan, and the suggested change to S4 and S5 would therefore ensure that these needs are taken into account.

63)Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered 46 as part of affordable housing requirements, will successfully enable the provision of military homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree. Clearer wording is required here. "Development proposals for military affordable housing" rather than "Development proposals that include military affordable

housing". This avoids ambiguity and undesirable outcomes where military housing forming a small part of a larger development is used to circumvent development plan requirements.

64)Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree – although this could harm the quality of accommodation for occupiers of the market housing and fail to meet identified housing need within the market housing component.

65)Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

LPA Response: Agree – If this is a set level and not subject to viability or other uncertainties.

66)Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards? a) If so, what changes would be beneficial?

67)Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer

LPA Response: Strongly disagree. The LPA is best placed to decide what is appropriate in each case. Allowing the applicant to dictate this would undoubtedly lead to instances where the Council would end up not being able to mobilise properly (e.g. collecting multiple pots to go towards a scheme) and then having to pay the contribution back.

We already accept commuted sums for a range of matters, affordable housing, leisure, transport improvements, etc. as appropriate.

71)Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

LPA Response: Agree

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

LPA Response: It allows flexibility for the Council, as required.

72. Do you agree with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Partly agree: A well-meaning policy if what it is trying to achieve is that such developments are either sited near to or provided with suitable community and communal facilities, including a clear aim of resisting inappropriately sited/designed development.

73. Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: No additional comment.

74. Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

75. Do you agree the proposals provide adequate additional support for rural exception sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, including what other changes may be needed to increase their uptake?

76. Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

77. Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

78. Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

80. Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Disagree.

a. Please provide your reasons, particularly if you disagree.

LPA Response: Disagree - Shorter timescale for commencement likely to frustrate investment and funding. Also fails to acknowledge that once lawfully commenced there is no time limit on completion of development. Any shift away from this long-established principle would require new legislation rather than a tweak to NPPF.

81. Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: There are already mechanisms in place to allow for flexibility including appropriate wording of conditions/S106 agreements, use of S.73.

82. Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? *Yes, no*

a) Please provide your reasons.

LPA Response No – likely to require legislation and a strategic national spatial plan rather than generic policy.

83. Do you agree with the proposed changes to the Housing Delivery Test rule book? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Neither agree nor disagree.

a. Please provide your reasons, particularly if you disagree.

84. Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response There is a need for a national spatial strategy to reflect and/or encourage growth areas which will inevitably extend across local government boundaries and need to be considered at the regional and national scale.

85. Do you agree with the approach to meeting the need for business land and premises in policy E2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

86. Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly disagree

a. Please provide your reasons, particularly if you disagree.

The policy lacks a spatial framework for delivery and/or steering development to best locations – encouraging clusters, economies of scale etc.

87. Do you agree with the approach to rural business development in policy E4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

88. Do you agree with the proposed changes to policy for planning for town centres? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.* **Disagree**

a. Please provide your reasons, particularly if you disagree.

LPA Response: TC1(d) – watering down sequential test – lacks clear spatial control.

89. Do you agree with the approach to development in town centres in policy TC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. If not, please explain how you would achieve this aim differently?

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

LPA Response: The introduction of Use Class E has made it impossible to operate some elements of policy for centres, in particular ensuring that key frontages retain a retail element to underpin the vitality and viability of those centres. It is also no longer possible to accurately monitor changes of use within centres, which means that it is difficult to keep track of exactly the impact that it has had.

Do you believe the sequential test in policy TC3 should be retained? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly agree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Strongly agree. The sequential test should be retained, as it is one of the key tools in ensuring the continued viability of existing centres. It has been hugely successful in limiting out of centre development over the last few decades, and it is not clear why it should be abandoned.

92. Do you agree with the approach to town centre impact assessments in policy TC4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

93. Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: The key issue is that permitted development rights have been extended under Part 24 to such an extent that most of the matters raised by Policy CO1 would not be controllable by the LPA.

94. Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.* **Agree**

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree (but see above re. lack of control)

95. Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

96. Do you agree with the approach to planning for energy and water infrastructure in policy W1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly disagree

a. Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

LPA Response: Not clear about degree to which utility company requirements are a material consideration. Should not be left to individual utility companies and LPAs – again – requires national spatial planning – especially energy supply and water supply.

97. Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

98. Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

99. Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: See above (96)

a. Please provide your reasons, particularly if you disagree.

100. Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

101. Do you agree with how policy M1 sets out how the development plan should consider oil and gas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

102. Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

103. Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

104. Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

105. Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

107. Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

109. Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

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

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

112. Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

113. Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

114. Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

115. If not, what further guidance is needed?

116. Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

117. Do you agree policy L2 identifies appropriate typologies of development to support intensification? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Disagree

a. If not, what typologies should be added or removed and why?

LPA Response: Disagree - Permitted development rights have created a confused approach whereby these 'typologies' can be achieved without planning permission being applied for. If design quality is important, any changes to policy should be matched by improvements to PD rights where these could otherwise lead to undesirable outcomes – including poor design, harm to neighbouring amenity and importantly a lack of contributions to local infrastructure.

L2.2 – simultaneous conditions - far too detailed for national policy.

118. Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

119. Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as

corner plot redevelopment and upwards extensions. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Disagree – please see above.

a. Please provide your reasons, particularly if you disagree.

120. Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: See above

121. Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. If not, please explain how guidance could be clearer?

122. Do you agree with the minimum density requirements set out within policy L3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

b. Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

123. Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

124. Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons and preferred alternatives.

125. Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? *Yes/No*

a. If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

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

127. **If so, what should that range be, and which locations should it apply to?**
128. **Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- LPA Response:** Disagree. Unnecessary. Leave to local development plans/documents.
- Perhaps change focus towards potential for annexes for intergenerational living and supporting those with restricted mobility /disabilities
129. **Please provide your reasons, particularly if you disagree.**
130. **Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
131. **Please provide your reasons, particularly if you disagree.**
132. **Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**
133. **Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**
134. **Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
135. **Please provide your reasons, particularly if you disagree.**
136. **Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**
137. **Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
138. **Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.**
139. **Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. **Please provide your reasons, particularly if you disagree.**

140. With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

141. Do you agree with setting an affordable housing ‘floor’ for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

143. Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please explain your answer.

144. Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

145. Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

146. Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Leave to individual site circumstances – rather than prescriptive arbitrary approaches.

147. Do you agree with the approach to design tools set out in policy DP2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

148. Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

149. Do you agree with the proposed approach to using design review and other design processes in policy DP4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. If not, what else would help secure better design and placemaking outcomes?

150. Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

151. Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

152. Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

153. Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

154. Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

155. Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly disagree

Please provide your reasons, particularly if you disagree.

LPA Response: The current NPPF provides a clear indication at Paragraph 115 d) that any detrimental impacts will need to be mitigated, see existing NPPF paragraph below.

'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.'

The updated paragraphs provide very little reference to developments having to mitigate their detrimental impacts with point 3 of Policy TR6 only stating the following:

All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.

By watering down the requirement for developments to mitigate their own impact it will make it harder for Local Authorities in negotiating mitigation schemes.

156. Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

157. Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Strongly Agree

158. Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

159. Do you agree that Local Green Space should be 'close' to the community it serves? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

160. Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Agree

a. Please provide your reasons, particularly if you disagree.

161. Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?

162. Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

163. Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

164. Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

165. Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly agree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Need to add light pollution and noise (including vibration).

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

167. Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

168. Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

169. Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

LPA Response: Agree

170. Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Agree

171. Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

172. Do you agree with the proposed clarifications to the sequential test set out in policy F5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Partly Disagree - at 2b – appears to be confusing a spatial policy (steering development to areas at lower risk of flooding) with a technical policy. The aim should remain to avoid development worsening flood risks in an area (not simply a site) known to be at risk of flooding.

2c3 – Conversions of existing buildings being exempted from the sequential test is an anomaly – a change of use is still increasing flood risk.

173. Do you agree with the proposed approach to the exception test set out in policy F6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree

174. Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: Strongly Agree

175. Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly Agree

a. Please provide your reasons, particularly if you disagree.

176. Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

177. The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

178. Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

LPA Response: Agree

179. Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Neither agree nor disagree.

a. Please provide your reasons, particularly if you disagree.

180. In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

LPA Response: Urban sites often have very little biodiversity value and a 10% uplift from such a low baseline achieves very little. It would not be practical to list all sites separately and many will fall not be subject to mandatory BNG when the thresholds change. Also need to consider Urban Greening Factors.

181. Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: There is very little reference to species or assessing the ecological value of a development site within planning documents. A definition of 'significant harm' would be helpful

182. Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, including how policy can be improved to ensure compliance.

183. Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning

system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. **Please provide your reasons, particularly if you disagree.**

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

185. Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. **Please provide your reasons.**

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

187. Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly agree, but please note the following:

a. **Please provide your reasons, particularly if you disagree.**

LPA Response: This is the first part where the concept of ‘heritage assessment’ emerges, and this is not explained or included anywhere in the document (not in the glossary). There is a need for either a footnote or an entry in the glossary that defines ‘heritage assessment’. For the avoidance of doubt, the emphasis should be on both the significance assessment and the impact assessment, which are both covered under ‘heritage assessment’, to clarify and use the correct terminology. If the Plan Making Policies only require significant assessment, this should also be noted.

188. Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

189. LPA Response: Partly agree

Please provide your reasons, particularly if you disagree.

LPA Response:

Policy provision (1) is Para 207 of the current NPPF. Given the often low quality of heritage assessment documents submitted for planning applications, there is a need for a stronger description of professional advice, as there are many statements prepared by applicants without a conservation perspective. This has been an ongoing issue and should be explained further. ‘where necessary’ makes documents vague and open to discussion.

Similarly, provision (3) appears to be put to encourage larger-scale development, as the emphasis is only on ‘scale’ and there is no reference to other aspects of development, such as height, form, or design. Because these are conservation policies, there should be more emphasis on how to conserve assets, not how to accept developments. Whilst the scale does not define the proposed development on its own, mentioning it alone causes some problems. There could be more explanation or description with reference to the urban design.

189. Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Partly Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Understand that the rationale for the change to 'substantial weight' can result in consistent language in the historic environment section of the NPPF. However, the existing wording 'great weight' meets the statutory requirement of 'special regard' and 'special attention' by the Planning (Listed Buildings and Conservation Areas) Act. Under the current NPPF, decision makers must give considerable importance and weight to the conservation of the heritage assets. Contrary to this, 'substantial weight' may be interpreted as more flexible within planning decision-making and could therefore be perceived as diluting the strong protection required by the statutory duties.

There is a need for more explanation and definition of terms in this section. What does 'substantial public benefit' or 'heritage benefit' mean? In practice, when there is no heritage benefit, what is expected should be clearly defined. There are so many ambiguous sentences that may be interpreted in favour of development by providing more flexibility. There is a risk that not everyone is a heritage specialist, and loss of heritage values may increase if there is no clear description or definition.

Provision (3) makes a connection to energy efficiency, but again, this is the only place in the historic environment section that needs further explanation. From the practical point of view, under the 'energy efficiency works', public benefit might be described by an applicant, while the nature of the works is not suitable for the historic environment. I think contradictions should be reduced as much as possible in this section.

Provision (5) is too long, and the connection between significance and harm is confusing.

190. Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a. Please provide your reasons, particularly if you disagree.

LPA Response: With reference to H4, note that there is another new term/wording, 'consistent use', proposed in the document, while it is 'optimum viable use' in the current NPPF. We assume that because the most viable use of a heritage asset is its original use and the draft NPPF provides more flexibility, this new term (not in the glossary) requires explanation. Adaptive reuse could be emphasised that conservation professionals know about, including impacts and assessing them. However, again, an application may be seen with a consistent use when the original use of the building is commercial, which was converted into two flats at some point in history and proposed for an HMO.

There is another wording, 'conservation benefits', in this part of the draft NPPF. Is this 'heritage benefit'? There is a need for definition and maybe more use of this benefit when assessing the impacts of the proposals. The main emphasis of the conservation should be on gaining 'heritage benefit' or 'conservation benefit'. The new NPPF, with a better structure, can be more descriptive and clear about not only heritage-related terminology (commented on in the previous sections) but also how the public benefit umbrella works for the historic environment. Is the heritage benefit part of the environmental benefit? Or is it a social benefit? This document could provide a better understanding for the local authority officers, planning inspectors, planning

agents and the public if the glossary includes more definitions for the historic environment and the sentences are clear, short and easy to understand, without any inconsistent interpretation.

- 191. Do you have any other comments on the revisions to the heritage chapter?**
- 192. Do you agree with the transitional arrangements approach to decision-making?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. Please provide your reasons, particularly if you disagree.
- 193. Do you have any further thoughts on the policies outlined in this consultation?**
- 194. Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. Please provide your reasons, particularly if you disagree.
- 195. Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a. Please give reasons.
- 196. Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial?** *Yes/No*
- a. If so, what do you believe would be the appropriate threshold? Please provide your reasons.
- 197. Do you have any views on how we should define ‘co-located energy infrastructure’? Please provide your reasons.**
- 198. Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres?** *Yes/No*
- a. Please provide your reasons.
- 199. What benefits or risks do you foresee from making this change? Please provide your reasons.**
- 200. Would you support the use of growth testing for strategic, multi-phase schemes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- 201. Would you support the optional use of growth testing for regeneration schemes?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please explain your answer.

202. Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a. Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market for sale housing.

LPA Response: Developers vary widely, in terms of required hurdle rates for profit and return, and therefore a one size fits all approach would not be appropriate. The ownership status of the development site and its performance, now and expectations into the future also impact expected profit, whilst we review the Viability of potential development sites within the wider market and within reasonable market expectations, there are countless variables and expectations for future market trends which will impact profit rates, including securing funding, and to set a standard rate would not be helpful as funding availability changes much quicker than policy can, and the lags in allowing policy to catch up, is one of the predominant challenges to unlocking development sites.

We have robust evidence indicating that some developers able to proceed with many new-build, build-to-sell schemes at profit levels below 15% on GDV. Applying a higher profit rate—such as 17.5%—would therefore negatively affect the delivery of affordable housing on schemes that inherently operate with lower profit margins. In many cases, it would also effectively set the profit level at an artificially high threshold, and would not necessarily unlock developments sites and would certainly not maximise affordable housing delivery.

203. Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

LPA Response: Yes, most definitely

a. Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

LPA Response: Types of Development which alternative profit levels should apply

Lower profit levels than the 15–20% profit on Gross Development Value (GDV) referenced above would be both reasonable and necessary for Build to Rent (BTR) developments and for conversion schemes. Profit should be proportionate to risk, and where risk is lower, a lower profit allowance is appropriate.

BTR schemes typically involve significantly reduced risk because they are usually forward-funded, with a purchaser already contracted at an early stage. Staged payments are commonly made throughout the construction period, fully mitigating sales risk in a manner similar to affordable housing delivery. BTR developments are not built speculatively, and the current policy framework should be updated to reflect the increasing prevalence of BTR in the market. The 15–20% on GDV benchmark has always been a rule of thumb for new-build, build-for-sale schemes, but developers may incorrectly apply this standard to other development types where it is not appropriate.

This profit rate is also unsuitable for conversion schemes, as the scope of works varies enormously. Some conversions involve construction costs similar to a full new build, while others involve minimal expenditure, for example, a change-of-use scheme returning a property to its original function. Applying a flat profit allowance of 15–20% on GDV therefore overstates

the required level of profit and does not reflect the actual risk profile. Similar to RICS valuation guidance, a profit on costs, is more suitable.

6% for Affordable Housing

We can confirm that a 6% profit level is appropriate, and suitable widely accepted industry standard, for affordable housing. This reflects the substantially lower risk, as affordable housing is commonly pre-sold with staged payments throughout the development period. As a result, the risk profile is materially lower than that of speculative open-market development. This is the profit level applied within 'Red Book' Valuations for development of standard affordable housing, as designated under the s106.

204. Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

Please explain your answer.

LPA Response: It would be beneficial for further guidance to be published that recognises different development typologies and developer models. For example, indicative profit benchmarks could include:

- **Build to Rent:** 10–12.5% profit on GDV
- **Conversions:** 15–20% profit on cost

Such categorisation would help ensure greater consistency and reduce the frequent misapplication of profit assumptions. Alignment with **RICS valuation guidance** is essential, as we often encounter biased application of profit rates, even within the same viability assessment—typically with unrealistically low profit assumptions used to justify a reduced Benchmark Land Value, and overly high rates used to depress the Residual Land Value. This practice can distort results and undermine transparency.

Consideration should also be given to linking profit levels to developer performance, differing profit hurdles across the sector, and the varying expectations developers hold about future market conditions. Developer return requirements are not uniform, and policy should reflect this diversity rather than impose a single standard rate.

The only consistent aspect across all schemes is that the negotiation of affordable housing forms a standard part of the planning process; and, these negotiations are often detached from the actual profit requirement of the development. More detailed and nuanced guidance would therefore help to produce more accurate viability assessments and ultimately support improved affordable housing delivery.

We consider it essential that guidance clearly states that affordable housing negotiations should only take place where it is evident that the affordable housing policy itself is the reason the scheme is not viable. The appropriate test should demonstrate that the development would achieve a reasonable profit level were the affordable housing policy requirements to be relaxed.

All too often, schemes are presented with implausible deficits which—despite scrutiny in accordance with RICS viability guidance—persist even after review, raising concerns about the reliability of the submitted evidence. For this reason, the application of a clear **common-sense test** should be emphasised. Current practice has drifted away from this fundamental principle, and reinstating it would help re-introduce proportionality, transparency, and trust into the viability process.

205. Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

Disagree

LPA Response: This will not be possible. What would be more helpful, is a far more detailed categorisation that reflects both the development type, with regard given to developer type. Profit expectations are market-led and highly specific to each individual scheme, influenced by a large number of variables, some of which are evident, some which won't be. Among those evident, the availability and terms of funding are particularly critical. As a result, it is not possible to apply a single, fixed approach across all developments.

206. Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a. Please explain your answer.

LPA Response: Developer return is an appropriate and established metric for Valuation, for Development appraisal, for land purchase, and therefore should remain for viability assessment. Further changes to this accepted approach would create uncertainty in the market and undermine development deliverability. Stability is fundamental to viability testing, and profit must remain aligned to the specific risk profile of a given scheme.

For example, the use of standardised land values would be similarly vulnerable to manipulation over time and would not provide the flexibility needed to support the delivery of development. A rigid approach would fail to reflect real-world market dynamics and could act as a barrier rather than an enabler to bringing sites forward. No two development sites are the same.

207. Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

a. Please explain your answer.

LPA Response: Mixed-use schemes, including those combining residential and a range of commercial uses—with a particular emphasis on community facilities or public realm improvements—may justify a different viability approach, but only where this is developed in close consultation with the local authority. Local authorities are best placed to understand the scale of wider community benefits associated with a scheme and the specific local needs at that time. They should therefore be able to apply existing flexibility tools fairly to support genuinely beneficial developments. However, approving schemes that offer limited community value simply because they pass a standardised viability test should not be treated as an acceptable or automatic outcome.

Planning viability originally emerged as a mechanism to unlock developments that were clearly essential for the economic or social wellbeing of an area. This underlying principle of Viability has unfortunately been diluted over time. Viability was intended to unlock stalled development sites to be applied where necessary, and the significance of individual developments varies considerably. To maximise affordable housing delivery, decision-making discretion must remain with the local planning authority—and this principle should be reinforced consistently through PINs decisions.

208. Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

LPA Response: Strongly agree

a. In what circumstances might a premium, or the usual premium, not be required?

LPA Response: Strongly agree. A landowner premium should be applied sparingly, as in reality the market determines the highest-value use of an asset. Even a 20% premium would not override the open market's assessment of best use. If a property is a strong commercial asset, market conditions will dictate that it is sold as such. Conversely, if residential use generates the highest value, a planning consent for residential use would naturally be pursued. In this context, applying an additional landowner incentive would only serve to erode affordable housing delivery unnecessarily.

In practice, a robust marketing process and up-to-date market intelligence already reveal the true market position, making a landowner premium largely redundant. Incentivisation rarely, if ever, outweighs the offers available in the open market. Where an asset is unsuitable for its existing use—such as being vacant, loss-making, or failing to meet statutory compliance—any uplift applied through a landowner premium would simply reduce affordable housing contributions further, without providing any genuine market-based justification.

b. What impact (if any) would you foresee if this change were made?

LPA Response: Overall, the effect would be positive to remove Landowners incentive, as it won't impact potential developments being brought forward, but is likely to improve Viability., it will improve viability and improve delivery of affordable, for reasons stated above.

209. Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Partly agree

a. Please explain your answer.

LPA Response: Partly agree. It is essential to first understand why the previous consent was not implemented. If there is a specific underlying reason preventing delivery, which relates to physical, legal, or other practical constraints, then that consent should not be considered an Appropriate Alternative Use Value (AUV). We also encounter cases where successive consents are sought explicitly to reduce or remove affordable housing requirements, and such situations should be treated with caution.

Where a consent is genuinely implementable—in market, physical, and funding terms—it may be appropriate to treat it as AUV.

If a consent has lapsed and no alternative use exists, then the previous consent may be accepted as AUV, but only where it can be demonstrated that it still aligns with current plans and policies. This approach would apply only where there is no existing use value during the intervening period.

210. If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion / Another metric / Neither*

- a. **If another metric, please set out your preferred approach and rationale.**

LPA Response: Not applicable, please see above

211. **What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?**

LPA Response: Adjustments are essential for land comparable sales data, to rebase against policy compliant schemes. This will take into account the actual delivery of affordable housing, and the necessary calculation should be applied to reduce the average plot value to compare to equivalent as policy compliant schemes.

Both plot values and sq ft values should be assessed when using land / development comps. Other adjustments should be applied to account for the specifics of the development in question.

Greater openness and transparency around land values and site-specific details is essential to improve the availability and reliability of comparable land data. At present, securing sufficient, high-quality land comparable evidence—particularly outside London—is extremely challenging, which limits the effectiveness and accuracy of land-based benchmarking within viability assessments.

212. **Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values and land transaction data of comparable schemes and/or the subject site; to help set the viability assessment in context. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

LPA Response: Strongly agree

- a. **Please explain your answer.**

LPA Response: Where genuinely comparable land evidence exists and can be clearly demonstrated as such, land values are tremendously important. They provide a vital benchmark against which the reliability of a residual valuation can be tested—particularly given how easily residual valuations can be manipulated to prove a desired outcome. When high-quality data is available, it helps to identify and challenge artificially inflated costs or depressed sales values, including those resulting from selective assumptions about specification or abnormal costs. If a Molior / London Residential Research database was available outside of London for development projects this would help delivery of affordable housing within the regions.

213. **Do you agree that a 2.5 hectare threshold is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a. **Please provide your reasons, particularly if you disagree.**

214. **Do you agree that a unit threshold of between 10 and 49 units is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a. **Please provide your reasons, particularly if you disagree.**

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

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

217. Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

a. Please provide your reasons.

218. If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?

a. Please provide your reasons.

219. If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.

220. If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.

221. What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

222. Do you agree with the proposal to extend the Permission in Principle application route to medium development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Disagree

a. Please provide your reasons, particularly if you disagree.

LPA Response: Disagree - Concerns that this overly simplistic approach doesn't take into account the types of constraints and considerations associated with medium sites and will result in unexpected delays and frustration for developers where these types of applications are applied for but are unsuccessful.

223. Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

224. Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

a. If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

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