



an independent force for a **better Bristol**

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NPPF consultation August/September 2024 – Bristol Civic Society response

The Society

We are an independent, voluntary organisation that exists to improve Bristol's built environment and celebrate its heritage. Our membership is drawn from the local area and we have over 600 members. Our members have lived experience of Bristol and care passionately about the city's future and how it will be shaped by the planning process. We represent an important and informed body of opinion. Through our working groups, we seek to influence the development of major sites in the city and improve transport and placemaking. We do this through active engagement on specific development proposals, and with plan and policy-making in the city. This means we are very familiar with how national planning policy filters through to decisions on development proposals and, as customers of the outcomes, are well-positioned to judge the effectiveness of current process and policy.

General points

1 Our overall view of the proposed changes

From our perspective in Bristol, as a city reliant on neighbouring local authorities to meet its housing need, the two most important changes are:

- the reinstatement through legislation of strategic cross-border planning, replacing the Duty to Co-operate. Specifically, the Planning and Infrastructure Bill and the English Devolution Bill. We await with interest the details of this to understand what new powers are proposed.
- the requirement to review the green belt and consider development in the grey belt.

The changes in the standard method are also significant in raising the level of housing targets, but for Bristol it is the two changes above that will have the biggest impact on planning for a greater number of homes. If an urban planning authority was unable to deliver the target level within its own boundaries before the proposed NPPF changes, then an increase in prescribed housing target will not on its own change that.

2 The housing crisis and other policy levers

It seems that the government is placing much emphasis on changes to the planning framework as a way of resolving the housing crisis, without much mention of other measures. The NPPF changes will not be enough on their own to increase housing supply or solve the housing crisis, including the affordable housing crisis. Increasing housing supply will not on its own necessarily reduce housing prices or private sector rents.

Also needed are:

- fiscal and policy incentives to encourage an efficient, more equitable use of the existing housing stock and the conversion and renovation for residential purposes of suitable existing buildings.
- fiscal and policy incentives to encourage brownfield development and grant aid to remediate and unlock brownfield sites suitable for residential development.
- direct public investment to achieve enough affordable homes and changes in policy to secure more social housing and other housing subsidised by the public purse. Relying solely on the private development market and housing associations to provide for affordable housing has not provided enough affordable housing in the past, and never will.
- finance enablers to encourage more housing development by public sector bodies and housing associations
- ways to speed up development control processes without putting at risk the quality of decision-making.
- make the planning process easier for SMEs, self-build and community groups.
- ensure that there are enough skilled staff in planning authorities and public bodies involved in the planning process. (The promised 300 new planning officers is only a small increase in capacity.) Local authorities need staff not just for development control but also for developing planning frameworks for areas of change.
- investment in the necessary social and hard infrastructure to support development - brownfield as well as greenfield. It is a mistake to assume there is sufficient, fit-for-purpose capacity infrastructure to support urban development sites.
- policies and investment to address labour and skills shortages in the development and construction industries and their supply chains,
- other policies to facilitate the delivery of homes. Increasing housing targets does not by itself lead to more homes being built.

3 The NPPF and issues other than housing

The government's focus in these NPPF changes is on housing growth. But there are other considerations that are just as important. For instance:

- net zero
and the priority given to re-use in preference to demolition and redevelopment
- Building in the numbers sought will have a significant impact on carbon budgets and risks undermining the pathway to net zero unless commensurate mitigations are taken. These include removing the fiscal incentive to demolish and rebuild, and changing planning guidance to make re-use the default option. Where we build and how we build affects carbon emissions. Not just the familiar concerns about transport emissions but also a building's operational carbon and, critically, embodied carbon. This is the upfront carbon from development that has the most impact on carbon budgets *now*. The form of new building affects carbon emissions - for example tall buildings typically have higher upfront embodied carbon than mid-rise – and how sites are laid out. If adopted, Part Z will help, but it is planning's role to make the designer's carbon challenge easier, for example by encouraging the right sort of building typologies.

- student accommodation

In Bristol and elsewhere, sites that could have addressed the domestic housing crisis are instead used for student accommodation, driven by universities' heavy reliance on income from foreign students. Governments should make changes to increase the universities' income so as to reduce their reliance on overseas students and question whether, as we adapt to low carbon living, it is sustainable to continue with the business model of attracting students to universities away from their normal places of residences.

- design quality

As the government's focus in these NPPF changes is on housing growth, it is not clear yet what its attitude is to the quality of design of new housing development. This consultation removes the term 'beauty' from design guidance, but otherwise leaves the strong emphasis on good design intact. This is welcome. However, there is no clear statement of intent to demonstrate the government's support for the design quality that delivers health and livability aims, or sustainability in general. Instead, the NPPF rolls forward the previous government's emphasis on shaving corners off approaches to livability in the interests of cramming more people onto brownfield sites in our towns and cities. - community involvement

The government's rhetoric has been around NIMBYism, but it is not clear yet what its attitude is to community involvement in planning. Whilst it might be right to increase powers at strategic cross-border level to secure the allocation of meaningful housing targets, community involvement in the development of local plans and design codes, and early involvement in major planning applications, continues to be important. Such involvement is needed in order to secure meaningful consent to new development.

Answers to the consultation questions follow on the next page.

Consultation questions	Possible response
<u>Chapter 3 – Planning for homes</u>	
<u>Housing need</u>	
<p>Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?</p> <p>[This question is about making the standard method for assessing housing needs mandatory, not advisory.]</p>	<p>Yes</p> <p>We do not object to compelling all planning authorities to use the same method of calculating a target. It is useful to have a single benchmark consistently applied everywhere, even if it produces an undeliverable result in some places. However, it is naive to think that compelling the use of a method will stop debates about the right number of homes to plan for..</p>
<p>Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?</p>	<p>Neither ✓ nor <input type="checkbox"/> - neutral</p> <p>It is unclear what difference to alternative approaches it makes whether the reference is retained or not. Removing the reference does not exclude the provision for exceptional cases where a planning authority provides evidence that it cannot meet the target. Inevitably the evidence will make use of an alternative method. So this change seems a change in the ‘mood music’ only.</p> <p>It seems naive to assume that removing the reference would reduce the number of instances where a planning authority provides evidence that it cannot meet the target and plans to deliver a lower figure.</p> <p>One option would be to retain the reference to using an alternative method, but remove the reference to ‘advisory starting-point’, which reads like an invitation to depart from the standard method.</p>
<p>Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</p>	<p>Yes</p> <p>Yes, we support removal of the urban uplift, which was an un evidenced adjustment to force much of the national housing requirement on cities even if they did not have capacity.</p>
<p>Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</p>	<p>Yes</p> <p>The December 2023 changes risked two-tier planning – delivering in-character development for protected areas such as conservation areas and AONBs, whilst the rest can take its chances. The focus should be on well-designed development appropriate to its context. The December 2023 changes gave unnecessary extra emphasis to one aspect of design.</p>
<u>Character and density</u>	
<p>Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular</p>	<p>Yes</p> <p>But not sure where capacity for doing these will come from</p>

Consultation questions	Possible response
the development of large new communities?	
<u>'the presumption'</u>	
<p>Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?</p> <p>["we are proposing changes to the presumption to add explicit reference to the need to consider locational and design policies, as well as policies relating to the delivery of affordable housing, when the presumption is engaged."]</p>	<p>Yes</p> <p>but explicit reference should also be made to the consideration of climate change in design policies</p>
<u>Housing land supply</u>	
<p>Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</p>	<p>Yes</p>
<p>Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?</p> <p>[This is about adjusting treatment of past shortfalls and oversupply in calculating the housing supply requirement.]</p>	<p>Yes</p>
<p>Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</p>	<p>Yes</p>
<p>Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</p>	<p>Yes</p>
<p>Question 11: Do you agree with the removal of policy on Annual Position Statements?</p>	<p>Not sure</p>
<u>Co-operation and strategic planning</u>	
<p>Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on</p>	<p>Yes</p> <p>Bristol has been constrained because the West of England Combined</p>

Consultation questions	Possible response
cross boundary and strategic planning matters?	Authority does not represent the true city region and as it stands it could not get agreement between its constituent authorities to sub-regional housing targets, and the fall-back of the duty to co-operate has also not delivered
<u>Other</u>	
Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	Yes
Question 14: Do you have any other suggestions relating to the proposals in this chapter?	Extend WECA to include North Somerset Council
<u>Chapter 4 – A new Standard Method</u>	
Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?	<p>Neither <input checked="" type="checkbox"/> nor <input type="checkbox"/> - neutral</p> <p>We do not object to a stock-based approach. Its attraction is that it is a more stable and predictable benchmark.</p> <p>Government says in its commentary on the proposed changes that it has chosen a standard method that prioritises stable numbers and is straightforward to understand and apply, which the stock-based method delivers. However, this method is likely to result in more anomalies than a method that tries harder to objectively estimate the need in each area.</p> <p>The two other stated aims are to deliver 1.5 million new homes over the next five years, and achieve a more balanced distribution of homes across the country, the latter being achieved by an affordability top-up. This top-up also does not attempt to objectively estimate the need in each area.</p> <p>Confusingly, the government also says in the commentary that the new method “removes arbitrary caps and additions so that the approach is driven by <i>an objective assessment of need.</i>” It does not appear to us that the proposed method has been driven by an objective assessment of need.</p> <p>The stock-based method chosen would not seem the method anyone would choose if objective assessment of need is the main criterion. If the purpose is the objective assessment of need, then the stock-based method will produce more than is needed in low demand areas. The proposed affordability top-up is loosely linked to need, but no-one could argue it is an ‘objective’ assessment of local need.</p> <p>In essence Government is setting a high target at national level, and setting a somewhat arbitrary distribution of that target across the country in line with its broader national housing market aspirations. The emphasis is on just delivering more homes rather than getting</p>

Consultation questions	Possible response
	<p>the geographical allocation 'right'.</p> <p>This is reinforced by a statement that “we are absolutely clear that authorities may justify planning for a lower number only where they can evidence hard constraints to the Planning Inspectorate”.</p> <p>This is one approach, and is a departure from the approach that has applied in the past. It feels like something of an experiment and is bound to have unintended consequences. For instance, in some areas more houses would be built than an objective assessment of local need would imply.</p>
<p>Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?</p>	<p>It is a credible method, but arguably it should be calculated over a wider housing market area than within a planning authority's boundary.</p> <p>The ratio is applied based on data specific to a local planning authority. If it was applied to Bristol, it would have an unintended effect because the urban area of Bristol should be treated as a single housing market area but it is split between two local authority areas, Bristol and South Glos. Commuter flows could have an effect on a ratio for any given local planning authority, either suppressing or inflating the ratio, undermining its meaningfulness as a measure of affordability. With the added emphasis on the ratio it becomes even more important to understand potential anomalies deriving from a lack of correspondence between travel to work areas and local planning authority boundaries.</p>
<p>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p> <p>[The proposed changes involve applying a higher affordability multiplier.]</p>	<p>The proposed affordability top-up is loosely linked to need, but no-one could argue it is an 'objective' assessment of local need. It seems to us somewhat arbitrary, so it is not really possible to judge it appropriate or not, as it is not evidence-based.</p>
<p>Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?</p>	<p>Yes</p>
<p>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>No</p>
<p><u>Chapter 5 – Brownfield, grey belt and the Green Belt</u></p>	
<p>Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first</p>	<p><input type="checkbox"/></p> <p>Approval of brownfield land for development should not be made the</p>

Consultation questions	Possible response
<p>step towards brownfield passports? [add "proposals for which should be regarded as acceptable in principle,"]</p>	<p>default without some qualification.</p> <p>Not all brownfield sites are suitable for building on, per se. Some need enhancements in supporting infrastructure before they are suitable and, just as for grey belt releases, people living in urban areas need access to open space so some brownfields need to be dedicated to that purpose. The proposed wording needs to be clearer that some brownfield land can be considered for development but then rejected for reasons such as these.</p> <p>There are not many brownfield sites left in Bristol so this will not resolve housing crisis</p>
<p>Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?</p>	<p>Yes</p>
<p>Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?</p>	<p>No</p>
<p>Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>The definition is fine but how it is used to achieve greater housing delivery will be critical.</p> <p>Essentially, Grey Belt land is land that is weakly Green Belt. But the development site still has to be "sustainable", so how will that be interpreted for a site away from infrastructure and public transport links? And how will the changes, as interpreted by developers and planners, affect the Green Belt aim (one of five) to restrain urban sprawl? The planners will have to do a lot more positive planning, not just respond to developers' proposals for sites. This is where the reinstatement of cross-border strategic planning will be important.</p>
<p>Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</p>	<p>Local authorities should keep up to date Green Belt reports, which monitor the quality of green belts.</p>
<p>Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?</p>	<p>Yes</p> <p>Include in the NPPF.</p>
<p>Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt</p>	<p>No</p>

Consultation questions	Possible response
purposes?	
Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?	Yes, they are important and should be required of all green belt related developments
Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?	Yes subject to ... Not all previously developed land is suitable for building on, per se. Some needs enhancements in supporting infrastructure before it is suitable. The proposed wording could be clearer that whilst previously developed and grey belt land should be identified and considered first, some sites can be considered for development but then rejected as they would not support sustainable patterns of development, for instance because of lack of supporting infrastructure.
Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?	Yes absolutely
Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?	✓ Yes in principle, with one caveat. Re the 'golden rules' in new paragraph 155 - (b) on infrastructure and (c) on green space. These seem superfluous. Either national policy already applies these principles on <i>all</i> new development, not just in the Green Belt, in which case the wording additions are superfluous. Or if existing national policy wording is deemed not clear enough, these principles <i>should</i> apply to all new development.
Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?	We are supportive of grey belt being used, though doubt there is much around Bristol
Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?	supportive
Question 33: Do you have views on how the assessment of need for traveler sites should be approached, in order to determine whether a local planning authority should undertake a	No

Consultation questions	Possible response
Green Belt review?	
Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?	Not sure, need to truly reflect local needs
Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?	Yes There should be a minimum of 50% on Green belt sites where land values will have rapidly increased and thus profits escalated, these should be captured to fund affordable housing
<u>Benchmark land values</u>	
Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?	Yes
Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?	Not sure. Depends how this is derived?
Question 38: How and at what level should Government set benchmark land values?	Using District Valuer's Office and base value of agriculture / green bell land
Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?	Yes probably
Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?	Local authorities should have clear affordable housing policies for % affordable homes and seek to achieve this on every scheme as well as required infrastructure
Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether	No See above, this situation should not occur

Consultation questions	Possible response
further contributions are required? What support would local planning authorities require to use these effectively?	
Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?	No
Question 43: Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?	No
Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?	No
Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?	No
Question 46: Do you have any other suggestions relating to the proposals in this chapter?	No
<u>Chapter 6 – Delivering affordable, well-designed homes and places</u>	
Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?	Yes
Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	No
Question 49: Do you agree with removing the minimum 25% First	No

Consultation questions	Possible response
Homes requirement?	
Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	No
Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Yes
Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	Expect developer to build with Homes England grants Local Authority would need clear policies, bids to Homes England /GLA for local programme of housing delivery
Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?	No, Don't have a maximum size this would be socially divisive
Question 54: What measures should we consider to better support and increase rural affordable housing?	Allow LA to plan for growth and encourage proper strategies for village extension and identification of new housing sites.
Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	Yes
Question 56: Do you agree with these changes?	Yes
Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?	No
Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?	Yes , we are doubtful that there are many small sites in urban areas, but where there are they too should provide % affordable homes
Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?	Yes, better to talk about high quality sustainable designs including innovative densification

Consultation questions	Possible response
<u>Requiring “well designed” development</u>	
Question 60: Do you agree with proposed changes to policy for upwards extensions?	Yes It needs to be clear that well-designed includes giving consideration to overlooking of neighbouring properties including their gardens.
Question 61: Do you have any other suggestions relating to the proposals in this chapter?	Yes re encouraging high quality denser schemes including innovative housing design such as stacking maisonettes and apartments
<u>Chapter 7 – Building infrastructure to grow the economy</u>	
Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	Yes
Question 63: Are there other sectors you think need particular support via these changes? What are they and why?	Arts, culture, media, production, makers
Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?	Yes And that these sorts of development would be best located away from urban areas, at sea, or abroad. They do not contribute to regeneration and community growth
Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?	No
Question 66: Do you have any other suggestions relating to the proposals in this chapter?	No
<u>Chapter 8 – Delivering community needs</u>	
Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Yes
Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Yes
Question 69: Do you agree with the changes proposed to paragraphs 114	Yes We support “A vision led approach to promote promoting sustainable

Consultation questions	Possible response
and 115 of the existing NPPF?	transport modes". But the wording needs enhancing to be clear what this means.
Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	Positively encouraging community infrastructure, by switching to sustainable travel proposals and low energy homes which equate to cheaper running costs and thus people can be encouraged to healthier and affordable diets etc
Question 71: Do you have any other suggestions relating to the proposals in this chapter?	No
<u>Chapter 9 – Supporting green energy and the environment</u>	
Question 72: Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?	Yes
Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	Yes
Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?	Yes
Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?	No Keep as is
Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?	No
Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	No

Consultation questions	Possible response
Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	Set standards for net zero homes, and high quality sustainable design, bi-diversity offset always on site, tree planting monitored
Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?	<p>Government should be taking the lead and should provide an easy-to-use methodology to assess the carbon implications of a local plan. Any national policy wording to require local plans to minimise carbon emissions is toothless unless associated with carbon accounting to measure the impact on emissions of different approaches, and to demonstrate consistency with net zero targets.</p> <p><u>The requirements re climate change for a local plan</u></p> <p>Local planning authorities are bound by a legal duty to prepare local plans “designed to secure that the use and development of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.” In discharging this duty, local authorities should comply with paragraph 158 of the NPPF and ensure that local plans are in line with the objectives and provisions of the Climate Change Act 2008. This means a local plan’s development strategy (and supporting policies) should be consistent with both the Climate Change Act’s net zero target and the supporting carbon budgets. The Sixth Carbon Budget requires, by law, greenhouse gas emissions to be reduced by almost 80% by 2035. Consistency with national policy is a key consideration of soundness. National planning practice guidance is very clear that this applies to climate change “Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking It now forms part of the presumption in favour of development. <i>To be found sound</i>, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.”</p> <p><u>The evidence base to satisfy the requirement</u></p> <p>A critical part of a plan’s evidence base must be an assessment of the carbon emissions the plan’s strategy will give rise to. Without such an assessment, we do not know the anticipated carbon implications of the chosen strategy and supporting policies; whether a draft local plan is consistent with national policy and the statutory requirements; and, therefore, whether a plan is sound.</p> <p><u>Government action to facilitate carbon assessment</u></p> <p>Government should be taking the lead and should provide an easy-to-use methodology to assess the carbon implications of a local plan. Any national policy wording to require local plans to minimise carbon</p>

Consultation questions	Possible response
	emissions is toothless unless associated with carbon accounting to measure the impact on emissions of different approaches, and to demonstrate consistency with net zero targets.
Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?	Yes Environment Agency should have larger budgets to fund effective flood protection measures that also contribute to good place making and ultimately enable new developments
Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?	Yes The NPPF needs amending to put climate change centre stage, to ensure that new development is planned for locations and <i>in ways</i> that reduce emissions both <i>in construction</i> and in use. Back in 2010 the last Labour government didn't get the chance to implement its updated planning policy on climate change. That policy said "Climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development. The Government expects planning to continue to provide for the development needs of all in the community, contribute to housing supply and economic growth and support social justice. Planning should also continue to sustain biodiversity and protect natural and historic environments. All planning strategies, and the decisions taken in support of them, must however reflect the Government's ambition to help business and communities build a low carbon future and prepare for the impacts of climate change." Something equally powerful is required now. Reinstate policy on community energy.
Question 82: Do you agree with removal of this text from the footnote?	No
Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?	Not sure
Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?	Not sure this is about the utilities companies
Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?	Yes Water companies need to align their capital programmes, investment, and improvement to growth area plans and in a timely way, too often they drag down development
Question 86: Do you have any other suggestions relating to the proposals	No

Consultation questions	Possible response
in this chapter?	
<u>Chapter 10 – Changes to local plan intervention criteria</u>	
Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	Yes
Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?	No
<u>Chapter 11 – planning application fees + cost recovery related to National Infrastructure Projects</u>	
Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?	Yes
Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.	N/A
If Yes, please explain in the text box what you consider an appropriate fee increase would be.	
Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?	Yes
Yes No – it should be higher than £528 No – it should be lower than £528 no - there should be no fee increase Don't know	

Consultation questions	Possible response
If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.	
Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.	Not sure
Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.	There should be a fee for all types of applications, since the Local Authorities ought to be able to recover their costs
Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.	Yes, but not clear what 'non-profit' making means?
Question 95: What would be your preferred model for localisation of planning fees?	100% Local Authority level
Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee. Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally. Neither Don't Know	Full localisation
Please give your reasons in the text box below.	
Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?	Yes
If yes, please explain what you consider an appropriate increase should be and whether this should apply to all applications or, for example, just applications for major	Apply to all, and cover costs, and go up every year in line with inflation or similar index of costs

Consultation questions	Possible response
development?	
Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?	Planning history, enforcement, certificate etc
Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?	Yes how else do Local Authorities cover their costs on their huge applications
Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.	Having an agreed PPA in place with agreed costs and milestones is the best way to manage large applications
Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?	None
Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.	There are masses of costs of work to get DCOs ready for submission including community engagement. There should be an agreed programme with milestones and costs attached, and asset aside contingency.
Question 102: Do you have any other suggestions relating to the proposals in this chapter?	Cover costs of community engagement
<u>Chapter 12 – The future of planning policy and plan making</u>	
Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think	Not sure, some of the plan are already out of date.

Consultation questions	Possible response
we should consider?	
Question 104: Do you agree with the proposed transitional arrangements?	See above
Question 105: Do you have any other suggestions relating to the proposals in this chapter?	No
<u>Chapter 13 – Public Sector Equality Duty</u>	
Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?	Just to say the over reliance on formal plan making to solve the housing crisis is too slow - the processes and decisions will negatively impact most on those who are homeless or living in unacceptable homes, the solution is in speeding up development not planning . The developers need to be held better to account, and stop slowing development to ensure cash flow/higher returns.