



Matthew Pennycook MP
 Minister of State for Housing
 Department for Levelling Up, Housing and Communities
 2 Marsham Street
 London
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Dear Mr Pennycook,

24th September 2024

RE: Civic Voice's Response to the National Planning Policy Framework Consultation

Civic Voice welcomes the opportunity to contribute to the Government's consultation on the National Planning Policy Framework, published on 30 July 2024. We have actively engaged with our members through online surveys, regional briefings, roundtable discussions, webinars, newsletters, and blogs to gather views from across the civic movement. Throughout this consultation, we held seven events, attended by 202 individuals, including events with Clive Betts MP and the Home Builders Federation. Additionally, we received 405 responses through an online survey and 366 email submissions from individuals and civic societies, all contributing detailed written comments that shaped our final response.

In drafting our response, we were supported by a working group comprising active members of local civic societies alongside a second group of regional volunteers who provided valuable input. We also shared draft answers and briefings with the wider civic movement throughout the consultation period, allowing further contributions to shape our strategic policy response. We have also encouraged individual civic societies to respond directly to the consultation.

As the national charity representing civic societies across the country, we welcome the Government's recognition of the crucial role that communities play in shaping housing and planning policy. In a letter dated 2nd August, the Government stated, "We recognise the important role that civic societies play in promoting the interests of local communities and I would like to assure you that community involvement in place-making is at the heart of the planning system." Civic Voice is encouraged by this recognition and urges the Government to ensure that local communities' voices remain central in planning and housing decisions.

While we recognise the Government's efforts to refine housing need assessments, particularly with a focus on affordability and the housing crisis, more action is needed. Simply raising housing targets does not necessarily result in more homes being built, nor does increasing supply alone guarantee lower housing prices. The private sector, driven by profit, often prioritises high-end developments over genuinely affordable homes. Without targeted interventions and reforms, the private sector may continue to prioritise high-end developments over genuinely affordable housing, leaving the core issues of affordability and social housing unmet. Public bodies, local authorities, and housing associations should be empowered and resourced to ensure new developments meet the needs of communities, especially regarding affordability and social housing for low-income households.

Civic Voice believes that with the right level of community involvement, enhanced strategic planning and housing studies at a regional or sub-regional level, potentially overseen by combined authorities or regional planning bodies, could provide the necessary framework for addressing these complex

issues. Local housing markets should be assessed as to the pattern of needs and priorities by Mayoral/ Combined authorities or through new ad-hoc arrangements and these assessments should form the basis of public investment programmes.

While Civic Voice is encouraged by the Government's recognition of the importance of civic societies in place-making, given recent narratives in the media about NIMBYism, we believe it's important to clarify how the Government will ensure meaningful and constructive community involvement in planning decisions. While it is understandable that strategic, cross-border powers may need to be increased to meet housing targets, the importance of local community engagement cannot be overstated. It is crucial that local communities have a real and meaningful role in shaping planning decisions. Civic Voice believes that strengthening Statements of Community Involvement and ensuring early, sustained public engagement in major planning applications are essential steps. We call on the Government to affirm its commitment to embedding community involvement at every stage of the planning process, ensuring that local voices are not only heard but acted upon in housing and development decisions. Civic Voice will remain focused on ensuring that communities have a real say in shaping the future of their local areas.

In summary, while Civic Voice welcomes many of the proposed reforms, we urge the Government to take further steps to address housing affordability, support public sector involvement in housing delivery, and ensure that community involvement remains central to the planning process. We look forward to ongoing dialogue with the Government as we work together to improve the planning system for all communities.

We have attached our detailed response to the consultation questions and have also responded to the online survey. Where we have not responded to a question, it is not due to a lack of opinion but rather our focus on the key issues raised by communities during our own consultation process.

We trust this response will be useful, and we look forward to continuing discussions with Ministers and Government officials on planning reform proposals, including our engagement with your officials on the recent survey on retrofitting.

Yours sincerely,



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Civic Voice response to National Planning Policy Framework September 2024

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

Yes. We agree that there should be consistency in the methods used to assess housing needs.

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? Yes.

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62? Yes. We support this reversal but recommend that combined authorities and city regions be given the ability to specify local housing need uplifts, as they are best placed to determine local conditions.

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130? No. We strongly believe that local character must be preserved, particularly in areas with heritage significance, such as Conservation Areas and Listed Buildings. Removing protections on density could pose a significant risk to these areas, potentially leading to inappropriate developments that harm the historic fabric of our towns and cities.

Civic Voice is concerned that such a policy change could undermine the safeguarding of our historic environment, which is not only crucial to local identity but also to the UK's status as a premier tourist destination. The historic heritage of the UK is a key driver of the tourism economy, and failure to protect it could have far-reaching economic consequences.

If this change were accompanied by stronger protections for Conservation Areas and Listed Buildings, we might find it more acceptable. However, without these safeguards, the policy risks irreparable damage to areas that contribute significantly to the nation's heritage and economy. The balance between development and conservation is critical, and the NPPF must ensure that heritage protection remains at the forefront of planning policy.

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 the development of large new communities?

Agree in part. Civic Voice supports the move towards spatial visions that encourage higher density in new communities, but we stress the importance of ensuring that these areas remain liveable. Design guides should promote varied densities and prioritise liveability, especially with respect to green spaces and community facilities, ensuring a high quality of life for both existing and future residents.

While Civic Voice recognises the value of design guides, we also believe that these must reflect local distinctiveness and allow flexibility. A one-size-fits-all approach for district-wide design codes risks becoming too generalised and may not adequately address the diverse characteristics across different areas. Instead, we recommend a two-tier approach: a broader district-wide design guide that sets out the character of different areas within the district, complemented by more specific design codes for larger development sites. This would ensure heritage protection while allowing room for local variation and innovation. It's essential that design guides and codes do not stifle creative development, particularly in areas with unique architectural features or where exceptions are necessary to reflect particular circumstances. In an ideal world, a district wide design guide would provide an overarching framework, but without the necessary resources to enable this, we question the feasibility.

The government must invest in building local authorities' design skills and empower them to use design tools, such as design review, to ensure high-quality developments. Furthermore, we stress the importance of up-to-date conservation area appraisals to guide new developments, ensuring that the historic character of an area is respected while allowing for sustainable growth.

We also believe that district-wide design guides would provide better control over small but significant developments, particularly in rural areas that may otherwise be overlooked in the drive for new housing. These areas often contain valuable historic heritage that must be preserved, and conservation area appraisals play a crucial role in safeguarding this.

We recognise the need for greater density in certain areas, especially given the housing shortages, but this must be done in a way that enhances both urban and rural quality. Design codes should focus on creating liveable communities, incorporating green spaces, infrastructure, and community facilities. Density should not come at the cost of liveability or local character. Liveability is commonly more difficult to achieve at higher densities and additional requirements will be necessary in new developments, especially to provide a good environment for children (See our response to Q71). We want to see places comprising homes, not estates solely with housing.

Finally, we believe that active participation with communities must shape design codes. Meaning and active participation ensures that new developments meet the needs and aspirations of the community while respecting local identity. By embedding design codes into local plans, informed by both community engagement and conservation area appraisals, we can create places that respect local character while addressing housing needs.

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

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?

Yes, but the problem with this is that there is no mention of a test to be done to demonstrate that a site in an up-to-date development plan is undeliverable. Without such an approach, it would be too easy for the housing industry to claim that a site is undeliverable, thus undermining all of the development plan preparation work, including consultation with the community.

Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF? Yes. This needs to be replaced with the criteria for a stringent test to demonstrate the undeliverability of an allocated site.

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? With some reservations we agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations, but the assumption is that the buffer is based on the actual behaviour of developers rather than just projections of housing need. If reinstated, the buffer should account for issues such as undeliverability of sites during the plan period, which could remove the need for negotiation on sites deemed undeliverable.

However, we also see the argument that there is no strong justification for the 5% buffer on top of the 5-year housing land supply requirement. The 5-year rule itself has been long-standing and widely accepted, originally intended to create an adequate land bank while considering the factors that delay development. Increasing this requirement to effectively 5.25 years through the buffer appears arbitrary and could place additional strain on councils. Many councils may already struggle with the increased housing demands, and removing the buffer could ease this burden and reduce the instances where the presumption in favour of unplanned development applies.

This needs careful consideration, balancing the need for housing delivery with the practical challenges facing local authorities.

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

With some reservations we agree a five per cent buffer is about right. A buffer of more than five per cent would probably result in the overprovision of sites, especially given that the government's estimates of need are high in relation both to previous estimates and actual house building and completion rates.

Question 11: Do you agree with the removal of policy on Annual Position Statements? Yes, given their infrequent use.

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

Yes, Civic Voice strongly supports amending the NPPF to further encourage effective co-operation on cross-boundary and strategic planning issues. Housing, infrastructure, and environmental challenges rarely align with administrative boundaries, and without strategic co-operation, the ability to meet these needs comprehensively is significantly diminished. Effective cross-boundary collaboration is essential for ensuring that infrastructure and housing delivery are coordinated, particularly in relation to larger regional projects and developments that impact multiple local authorities. This is particularly important for addressing the housing crisis, transport connectivity, substantial modifications to the Green Belt and climate resilience, all of which require a coordinated approach across local authority boundaries.

Civic Voice believes that enhanced strategic planning at a regional or sub-regional level could provide the necessary framework for addressing these complex issues. The form of regional or subregional planning exercises will need further discussion however, given the variety of local administrative and other arrangements.

This amendment presents an opportunity to move away from this fragmented approach and towards more coherent, long-term strategic planning.

Civic Voice supported the need for a national spatial plan in our response to the Planning White Paper in 2021, as advocated by the UK 2070 Commission. While a national spatial strategy would provide a valuable long-term framework for addressing spatial inequalities and guiding priorities such as renewable energy infrastructure, affordable housing, and sustainable development, we recognise the urgency for action. Given that a national spatial plan could take several years to develop, it is essential to integrate and align this process with existing national policy frameworks, particularly in areas like energy planning. The Government needs to find a way to link urgent, short-term decisions—such as those regarding the location of new electricity power lines—with a longer-term vision. This will ensure that while immediate priorities are addressed, we continue working towards a cohesive strategy that connects national objectives with local and regional needs.

Addressing the urgent challenges of climate change and renewable energy requires coordinated efforts across and within regions. Introducing a national plan for renewable energy infrastructure would enable schemes to be aligned with broader environmental goals and fast-tracked through the planning system. This reflects our broader belief that planning must focus not just on immediate needs but on creating long-term, sustainable, low-carbon communities.

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals? Yes. The current test of soundness is narrowly drawn. Compliance to a sound methodology is important. However, technical compliance is not enough. The basis and workings of the estimates should be justified and clearly explained and presented using appropriate graphical material. The statistical base of local planning needs to be greatly improved, with the use of more graphical material drawn from standard software such as EXCEL. The Local Plan examination process should promote the better use of statistical material.

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

A revised NPPF should also require Councils to use a standard methodology for the calculation of employment trends and cross district boundary commuting to work. The aim should be to promote a balance between housing and employment projections in every council district and, in particular, to avoid any strategic proposal that will lead to an increase in either inward or outward car-based commuting. The need for employment, transport and housing land allocations should be considered together.

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?

Agree in part subject to comments below.

Civic Voice recognises the challenge in finding a perfect method for calculating housing need, as demonstrated by the number of times the standard method has been reviewed. Changing the target methodology alone will not resolve the fundamental issues surrounding housing delivery. The standard method applies necessary pressure on local authorities to build more housing.

A consistent, nationwide benchmark, such as the standard method, is useful as a starting point for determining housing targets. Projection-based methods, which rely on historical data, often raise questions about their assumptions, leading to frequent revisions in targets that can cause uncertainty. A simpler, stock-based method, as proposed, could provide a more stable and predictable approach. However, the government's rationale for aligning the method with broader national housing market ambitions is not fully explained. While this shift could yield more balanced targets—perhaps lower in areas like London and higher in the North—the criteria for these adjustments need to be clearer. Transparency and fairness in assessing housing need should be ensured early in the Local Plan process, and clearer criteria for Examiners and the public to understand the process to review these exceptions is essential.

Housing stock alone cannot fully capture housing need. The interaction between housing stock and household projections, especially the variations in occupancy rates across regions, is critical to understanding local housing needs. Failing to account for these factors, and waiting lists, homelessness stats, second home owners, household size and local demand, risks producing skewed or inadequate estimates of housing requirements.

While the stock-based method offers a potentially more consistent baseline, it should be combined with considerations of occupancy rates and local factors to ensure more accurate and responsive housing targets.

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?

Civic Voice acknowledges the importance of addressing housing affordability and agrees that the workplace-based median house price to median earnings ratio can be a useful indicator of housing pressure in a given area. Averaging this ratio over a three-year period helps capture longer-term trends rather than being skewed by short-term fluctuations, making it a more stable metric for assessing housing needs.

However, affordability is a complex issue that cannot be fully addressed by this ratio alone.

The current definition of affordability—set at 80% of the market rate—remains out of reach for many, as it is still far beyond what average salaries can support. Civic societies widely view this definition as inadequate, and it points to the need for a broader rethink of housing and land market structures. While adjusting the standard method's baseline using the house price-to-earnings ratio can provide a helpful starting point, we believe it should be used alongside other critical local data. Focusing solely on the workplace-based ratio risks overlooking vulnerable groups, such as those not in full-time employment or individuals earning below the median. To address the full spectrum of housing needs, the method should account for wider socio-economic factors, ensuring that new housing meets the needs of all community members—not just those in the workforce. This ensures that housing targets are realistic and aligned with sustainable development goals.

In conclusion, while Civic Voice supports the use of the median house price-to-earnings ratio as part of the standard method, we advocate for a broader, more nuanced approach. This should consider additional local factors and ensure that new housing is affordable, sustainable, and inclusive for all members of the community.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method? [The proposed changes involve applying a higher affordability multiplier.]

Civic Voice recognises the critical importance of addressing affordability in the housing crisis and agrees that it should be given appropriate weighting within the proposed standard method, however an over-reliance on the affordability multiplier alone will not solve this. Affordability cannot be resolved through land supply alone. We echo the concerns raised by our civic societies that the current definition of affordability, which is set at 80% of the market rate, remains far beyond the reach of many individuals and families. It is essential that this metric is revisited to ensure it genuinely reflects local circumstances and needs. The delivery of affordable housing, particularly through social housing, must be prioritised, and infrastructure must be in place to support these new homes.

While the ratio is useful, affordability must be considered alongside other critical factors such as infrastructure capacity (including GP and school places), environmental sustainability, and the needs of local communities. Simply raising housing targets in response to affordability data without addressing these broader considerations risks creating developments that are unsustainable and detrimental to local character and quality of life. We believe that increasing the housing supply in response to rising median house prices in some districts is necessary, but it must be done with a balanced approach. For example, if median house prices in a council district are rising faster than the regional average, the buffer should be adjusted accordingly in the five-year housing land supply.

In summary, Civic Voice supports the inclusion of affordability in the standard method but urges the government to adopt a more holistic approach. This should not only focus on housing targets but also address the root causes of housing unaffordability and ensure that new developments support the sustainability, infrastructure, and character of local communities.

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?

Yes, Civic Voice believes the standard method should factor in evidence on rental affordability. Housing affordability is not limited to home ownership; rental affordability is equally critical, particularly for those who cannot afford to buy a home. Rising rental costs can significantly impact housing security, and a more comprehensive housing needs assessment should reflect these pressures. To incorporate rental affordability, we suggest that the method include a comparison of median rent to median income within local areas, similar to the house price-to-earnings ratio used for home ownership affordability. This would allow the model to capture areas where rental costs are disproportionately high relative to earnings, highlighting where housing supply needs to increase or where there are gaps in affordable rental properties. Additionally, Civic Voice believes the standard method should be applied at a sub-regional level, especially in areas overseen by combined authorities. This would provide a more nuanced understanding of the housing needs in larger, interconnected regions. By aligning the standard method with the work of combined authorities, local planning can better reflect the realities of the housing market and rental affordability in diverse areas. Regional variations, especially in rental markets, can differ greatly across the country. Factoring in localised rental data at the sub-regional level would ensure more accurate and responsive housing needs assessments, creating a clearer picture of housing challenges both for renters and homeowners. This alignment would help ensure that housing policy is better tailored to the needs of individual communities, leading to more effective and inclusive housing strategies.

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

Civic Voice supports the government's efforts to improve the method for assessing housing needs, we emphasise that a comprehensive solution requires more active public sector involvement, stronger emphasis on social housing, and a reconsideration of the tax and land market structures that currently drive unaffordability.

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

Yes, subject to the proviso below.

Civic Voice agrees with the proposed change set out in paragraph 124c, provided that the reference to brownfield land within settlements is retained. Without this safeguard, there is a risk of scattered, unsustainable proposals on brownfield sites located in the countryside, undermining sustainability and proper planning objectives.

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?

Local authorities need more and better powers to get brownfield released, We note the House of Lords Inquiry into Grey Belt and will be responding in detail to the questions submitted.

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?

Expanding the definition of PDL could lead to the loss of productive agricultural land, particularly in rural areas, where the balance between development and land preservation is delicate. Glasshouses and other horticultural facilities are an essential part of our rural economy and food security, and their protection should be prioritised. Civic Voice believes that if the definition of PDL is to be expanded, it must exclude land used for horticultural and agricultural purposes to avoid jeopardising local food production.

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

We recommend the following changes to the definition of grey belt land:

1. **Limiting development to specific circumstances:** Development should only take place where a council does not have an up-to-date local plan and has not met its housing delivery targets.
2. **Requiring proximity to existing settlements or transport hubs:** Development on grey belt land should be an extension of existing communities or located near railway stations to ensure sustainability.
3. **Preventing scattered rural development:** Isolated developments disconnected from existing infrastructure or communities should not be permitted.

By incorporating these changes, we can ensure that development on grey belt land is sustainable, meets genuine housing needs, and preserves the character of our rural areas. Community involvement is vital to ensure that local needs and preferences are fully considered.

We believe that grey belt sites should only be considered for development where a local council has failed to produce an up-to-date development plan (one that is less than five years old) and where the rate of housebuilding completions has fallen significantly behind the levels needed to meet identified housing needs or to maintain a five-year supply of deliverable housing land.

Going further, the definition must include a requirement that development on grey belt land should be an extension of an existing settlement or located near sustainable transport hubs, such as railway stations. This approach would prevent free-standing, scattered rural development, which is often unsustainable and can harm the character and integrity of rural areas. Ensuring that development is connected to existing settlements or infrastructure is essential for achieving truly sustainable development. That being said, we do need to create a buffer between settlements to stop them merging and losing identity.

Civic Voice believes that this strategy is the only feasible way to balance the need for additional housing with the preservation of our rural landscapes and heritage. By focusing development in areas already connected to infrastructure and services, we can promote sustainable communities while safeguarding the environment.

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

Yes, Civic Voice believes that a clear benchmark should be set at 2024. With the availability of high-quality aerial and satellite imagery, each local authority with Green Belt land should establish a 2024 imagery database. This would provide a definitive baseline against which any future degradation of Green Belt land can be assessed. By using up-to-date imagery, local authorities can more effectively monitor changes and ensure that high-performing Green Belt land is not inappropriately reclassified or degraded to meet grey belt criteria. This would help protect the integrity and purpose of the Green Belt, ensuring that it continues to serve its vital role in preserving natural landscapes, preventing urban sprawl, and supporting the well-being of communities.

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? Nothing more is needed if the only PDL allowed for redevelopment in the Green Belt is an extension to a settlement or railway station.

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 purposes?

It is important that the guidance includes an assessment of the social, environmental, and community value of the land.

This could involve:

- **Public accessibility:** Does the land provide valuable open space for recreation or community use, even if it is not high environmental quality?
- **Biodiversity:** Does the land support local wildlife or form part of an important ecological corridor?
- **Heritage considerations:** Does the land contribute to the historical or cultural landscape of the area?
- **Flood risk and climate resilience:** Does the land play a role in managing flood risk or contribute to carbon sequestration?
- **Acts as a buffer between settlements**

Civic Voice believes that additional criteria like these could help ensure that decisions about Green Belt land release or development are fully informed and reflect a comprehensive understanding of the land's broader value to local communities and the environment.

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? Local Nature Recovery Strategies should be part of a development plan or possibly a supplement to a development plan. They should be prepared promptly and publicised, should be co-ordinated with 'green and blue' strategies and should identify sites that will be protected from development. Nature Recovery Strategies are especially important in identifying habitats and biodiversity clusters that have been previously missed in official classifications. They also offer the potential of a new, online way of public consultation based on the principles of citizen science and are to be welcomed for this reason .

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?

Civic Voice supports the principle of prioritising the release of previously developed land (PDL) and grey belt land before considering greenbelt sites for development. However, we believe that careful consideration must be given to ensure that the release of such land is done in the most sustainable locations, taking into account local infrastructure, transport links, and community needs. While prioritising PDL and grey belt land is a step in the right direction, Civic Voice stresses the importance of a plan-led approach. Identification of grey belt land

should be done with caution. Development on such sites should be limited to areas that are well-connected to existing infrastructure, such as extensions to settlements or sites near public transport hubs, to avoid unsustainable, scattered development in rural areas. This will help protect the integrity of the countryside while addressing housing needs in a planned and responsible manner.

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, but the key question is who should determine whether the function of the Green Belt is being undermined and how they should do this. The release of land should not fundamentally undermine the function of the Green Belt.

The Green Belt plays a critical role in preventing urban sprawl, protecting the character of rural communities, and maintaining valuable open spaces for recreation, agriculture, and biodiversity. Urban sprawl operates over a wide area and this was recognised when the present national pattern of Green Belts was established in the 1950s and 1960s. Any fundamental review should be undertaken at a similar spatial scale- so reinforcing our view of the need for new forms of regional and subregional planning and new forms of public consultation to support any such review. Any release of land from the Green Belt should be done cautiously and only in exceptional circumstances where there is a clear, demonstrated need for development. In such cases, the planning system must ensure that the core purposes of the Green Belt are preserved and that any land release does not lead to a piecemeal erosion of its integrity. Additionally, it is essential that decisions to release Green Belt land are made through a plan-led process, with thorough community consultation to ensure that local views are considered. This will help maintain public trust in the planning system and ensure that Green Belt land is only released in a controlled and responsible manner, with careful consideration of the wider impacts on the environment and community.

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?

This approach should not be adopted until at least 2 years have elapsed from this significant change of policy, to allow time for at least some initial appraisal of Green Belt, grey belt and PDL in the Green Belt. This would give authorities the incentive to get on with this appraisal and to at least have up to date information on which to base its decision, even though the work would need to be followed up through the updating of its development plan. It would also encourage development of urban sites first, which if they current fall within the ‘too difficult’ category will otherwise be left behind completely.

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?

Releasing grey belt land for commercial purposes must not lead to piecemeal or speculative developments that undermine the character of local areas or create pressure on already stretched infrastructure. Commercial developments on grey belt land should only be permitted where they are well-connected to existing infrastructure, such as near public transport hubs or as part of an extension to existing settlements. This will help to ensure that new commercial developments do not exacerbate traffic issues or increase car dependency, which would counter the sustainability goals outlined in national planning policy. Local communities must be consulted to ensure that developments align with their needs and aspirations, particularly where commercial projects may have a significant impact on local amenities and the environment.

While grey belt land might be released under certain conditions, we remain committed to protecting the overall integrity of the Green Belt and only support release when there is clear evidence that it will not harm the broader Green Belt function. Any decision to release grey belt land should be driven by a plan-led process, ensuring that local authorities have up-to-date development plans that take into account long-term sustainability, local infrastructure capacity, and community needs.

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

Yes

Civic Voice supports the government's proposed approach to the affordable housing tenure mix, particularly the focus on providing a variety of housing options that meet the diverse needs of communities. However, we stress the importance of maintaining clear and enforceable targets for affordable housing provision. Developers should not be allowed to deviate from these targets due to viability issues without thorough justification and transparent review. This ensures that the mix of affordable housing is tailored to the specific needs of the local community, with a transparent and accountable process to guide decision-making.

While promoting affordable home ownership is important, we are concerned that this focus should not overshadow the pressing need for more social rent housing. True affordability remains out of reach for many, especially in high-cost areas, and there is a need for significant public sector involvement to meet these needs. Therefore, we advocate for a balanced approach that prioritises social housing provision alongside affordable home ownership.

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

Civic Voice believes that the 50 per cent affordable housing target should serve as a baseline indicator across all Green Belt areas, including previously developed land (PDL) within the Green Belt.

Local authorities are best placed to understand the specific housing requirements in their areas, and where there is a clear need, they should have the flexibility to set higher targets to deliver more affordable housing. This would allow councils to respond to local demand and ensure that housing developments align with community needs while maintaining financial viability. By using the 50 per cent target as a starting point, local authorities can ensure a strong emphasis on affordable housing, while retaining the ability to tailor targets to the particular challenges and opportunities of their areas. The specification of an appropriate affordable housing mix would be further supported by the preparation of regional editions of the NPPF and assessed in line with Combined Authorities.

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, subject to the following qualifications:

- The inclusion of a reference to existing residents as well, where development is on their doorstep.
- Compensatory public open space improvements and biodiversity safeguards should be routinely used in the development of former Green Belt sites.

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? A wider policy review is necessary. Benchmarking land values cannot be confined to green belt or grey belt sites. Land values within a Green Belt do not stand in isolation. They depend on values in the vicinity.

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?

Civic Voice supports the Government's proposal to reduce the scope of viability negotiation when land transacts above the benchmark land value. This approach is aligned with our broader view that viability assessments often lead to a reduction in community benefits, including affordable housing. By setting a clear threshold for when

viability negotiations are permitted, this policy would help create greater certainty for local authorities, developers, and communities.

However, we also believe that the benchmark land value must be carefully and transparently set to reflect local market conditions while ensuring that public benefits are prioritised. Reducing the scope for negotiation would help prevent developers from using viability claims to avoid policy requirements, such as affordable housing contributions, which are critical to meeting local needs.

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?

Civic Voice believes that the proposal to exclude additional contributions for affordable housing where development is policy compliant could have a detrimental effect on the delivery of social housing. Given the significant variability in land values across different areas, it is essential that affordable housing remains a key component of community requirements. In many cases, the provision of affordable housing is already challenging due to high land values, particularly in more desirable locations. If additional contributions are restricted, it could lead to missed opportunities for delivering affordable homes in areas where they are most needed. The flexibility to seek further contributions beyond the base policy is crucial to ensure that housing developments meet the full spectrum of community needs, particularly in relation to affordability. Affordable housing must remain an integral part of the contributions sought from developers, ensuring that local authorities can respond to the specific needs of their communities and maintain a balance between market and social housing provision.

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 further contributions are required? Yes What support would local planning authorities require to use these effectively? **Experienced land valuers, who maybe could be from a national panel, vetted by government.**

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 – see answers to previous questions on these developments.

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?

Civic Voice believes that a consistent start date should be set for all Green Belt sites, including those released through a Green Belt review in an adopted, up-to-date development plan. This approach aligns with our broader principle of ensuring transparency and fairness across the planning system. Applying the same valuation rules to all Green Belt sites, regardless of when they are made available for development, helps avoid disparities and arbitrary outcomes.

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

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?

The need for Social Rent housing is significant, particularly in areas where the affordability crisis is most acute. Social Rent provides a truly affordable option for individuals and families who are priced out of the housing

market and even other forms of affordable housing such as shared ownership. It is critical that housing needs assessments and policies explicitly prioritise Social Rent to ensure that housing developments meet the needs of the most vulnerable and disadvantaged members of society.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership? No. Civic Voice does not support the removal of the requirement to deliver 10% of housing on major sites as affordable home ownership. However, we do feel that it is important to specify the type of affordable home ownership product (eg shared ownership, first homes etc) in the NPPF guidance. It is also important to specify the definition of a 'major site'.

A balance is needed between home ownership and the provision of other affordable tenures, such as social rent, and affordable rent, to meet the diverse housing needs within communities. Rather than removing the 10% requirement, we recommend that local authorities retain the flexibility to adjust the mix of affordable housing based on local needs, as determined through their local plans and supported by community consultation. Requiring a minimum of 10% affordable housing provision is fine but it should not be confined to affordable home ownership.

Question 49: Do you agree with removing the minimum 25% First Homes requirement? No, but the percentage could be reduced, to make room for social rent housing.

Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites? First Homes on exception sites should be tied specifically to meeting local needs, especially in rural areas where local people are being priced out by incomers. Based on an up-to-date housing needs assessment.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types? Yes, but the reference to mix should be elaborated in more detail to include an additional criterion of dwelling size. The policy should be to promote developments that have a mix of tenures and types, including dwellings of varied size and number of bedrooms. On small sites, size and tenure should be controlled to ensure a balance within the locality, taking into account the characteristics of the existing stock.

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

There are various ways. Ensure that local plans include specific guidance on the percentage of social rent and affordable rent on major sites. Prevent housebuilders from seeking changes to planning agreements on the grounds of viability so that social rent and affordable rent numbers are not reduced significantly. Support housing associations and councils to purchase land (including use of compulsory purchase) on brownfield sites and lead on development to ensure a high proportion of social rent and affordable rent while maintaining a tenure and house type / size mix. Ensure that surplus publicly owned land (eg NHS and Ministry of Defence) is masterplanned before disposal to include significant amounts of social rent and affordable rent numbers.

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? There was no maximum size when council houses were built in the 50's, 60's and 70's and those estates worked well for those needing rented accommodation, until many properties were sold off under the right to buy.

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

To better support and increase rural affordable housing, Civic Voice recommends the following measures:

1. Strengthening the use of rural exception sites to allow affordable housing developments in small villages and rural areas where market housing might not be permitted. These should prioritise affordable and social rent housing for local residents, addressing the issue of local people being priced out by wealthier incomers.
2. Encouraging and providing financial support for community-led housing schemes in rural areas. This can empower local communities to create affordable homes that meet specific local needs, with initiatives such as Community Land Trusts (CLTs) playing a key role.
3. Allowing local authorities more flexibility to set affordable housing targets and tenure mixes that reflect the specific needs of rural areas. Local needs assessments should ensure that the housing delivered meets the demands of low-income families, key workers, and younger generations who wish to remain in their rural communities.
4. Increasing investment in rural infrastructure, such as public transport, broadband, and services like schools and healthcare, to make rural affordable housing developments more viable and attractive. This will help ensure that residents in rural affordable housing are not isolated and can easily access essential services.
5. Providing grants or subsidies for local authorities and housing associations to acquire land for affordable housing in rural areas. The cost of land is often a barrier to rural development, and reducing this cost can make affordable housing projects more feasible.
6. Supporting self-build and custom-build projects that provide affordable housing options in rural areas. Local authorities should be encouraged to allocate suitable land for these projects, which can be a cost-effective way for local people to build their own affordable homes.
7. For all rural areas, apply a rule that all sites (including those with less than 10 units) must deliver a proportion of affordable housing.

By adopting these measures, the government can help ensure that rural areas have a sustainable supply of affordable housing that meets local needs while maintaining the character and vitality of rural communities.

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

Yes – meeting the needs of looked after children has been a badly neglected issue in national and local planning policies.

Question 56: Do you agree with these changes? [to the definition of community-led development and the size cap for community-led exception sites] Yes and we would support recommendations made by our friends at the Community Land Trust who are the experts in this area.

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? Yes, we think it should be amended. We agree with making it easier for community-led developers and alms-houses to develop affordable homes. We also strongly recommend that there should be specific reference to social rent and affordable.

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?

No but we again refer to our friends at the Community Land Trust who will have specific feedback about small sites coming forward for community-led development. Communities have proven adept at identifying sites and winning local support, including in sensitive locations such as urban open space, back gardens and garages.

Small sites offer an important contribution to meeting local housing and other needs. The use of small sites is especially useful in encouraging in community-led development. In this we again refer to the views of our friends at the Community Land Trust. In addition, the allocation of small sites helps focus development on existing urban areas, promoting population and economic development in those areas and without the negative implications of green field development.

However, as the Consultation implies, an insufficient number of small sites is being allocated. Faced with target numbers, Councils do not have a great incentive to use their staff resources to find small sites. Sometimes the development plan background papers explicitly include a minimum threshold size for sites that are identified and assessed. The consultation process in local plan preparation including the examination in public is, in any case, dominated by larger property interests. Patterns of fragmented land ownership and unrealistically high 'hope values' are other constraints.

Local councils should be required to demonstrate how they have searched for small sites in urban areas and should be barred from applying a blanket minimum size threshold. To facilitate the development of small sites, government may need to review the law covering municipal land acquisition, assembly and compensation.

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?

Civic Voice supports the proposal to retain references to well-designed buildings and places while removing the subjective terms 'beauty' and 'beautiful' from the Framework. We believe that design should focus on practical, measurable elements that contribute to the quality and functionality of a place. Terms such as 'beauty' are highly subjective and can be difficult to define or enforce through planning policy, leading to inconsistency in interpretation and application. Focusing on well-designed, functional spaces that serve the needs of the community is more in line with the objective of creating sustainable, liveable environments. Good design should prioritise local character, functionality, accessibility, and sustainability.

Removing vague terms like 'beauty' ensures that design standards can be more effectively measured and adhered to in planning and development. Design guides and design codes should be the process to set the standard locally.

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

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

Civic Voice believes that design should be given a higher priority in plan making, including strategic spatial planning. Development plans should be seen as more than mechanisms for land use allocation; they should actively promote high-quality design that enhances the character and functionality of local areas.

The National Planning Policy Framework (NPPF) should explicitly integrate the importance of good design into the core aims of plan making, particularly in paragraph 16 of the existing document.

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF? Yes, BUT this is so far a missed opportunity to specifically help the renewable energy industry. Manufacture of equipment for commercial and domestic use i.e. wind turbines, heat pumps should also be given a specific mention for support.

Question 63: Are there other sectors you think need particular support via these changes? What are they and why? Manufacture of equipment for commercial and domestic use i.e. wind turbines, heat pumps should also be given a specific mention for support.

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, if government intends to support this with the appropriate level of staff

resources to cope to ensure a speedy decision-making process. It should also allow renewable energy equipment manufacture and schemes to be included.

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? Yes, it needs to be large scale developments. Local authorities and thus communities need to be involved in the decision making on smaller scale development. Each type of development would probably need its own limit set.

Question 66: Do you have any other suggestions relating to the proposals in this chapter? No

Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF? Yes, and this requirement of national planning policy should be given some publicity. How much of the local authority planning work is proactive and positive with promoters etc at the moment?!

Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF? Yes, but the wording of a) needs to include 'provision of' after the word alter.

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

Yes, subject to the comments below.

Civic Voice supports the general intent of the changes proposed to paragraphs 114 and 115, particularly the rejection of the outdated 'predict and provide' model in favour of a vision-led approach to transport planning. The 'predict and provide' method has proven to be far too costly in terms of road construction and improvement, and its environmental impacts would be disastrous if continued. A vision-led approach, which integrates transport and land-use planning, puts homes near jobs, is essential for creating sustainable, connected, and walkable communities. However, the proposed revisions are somewhat oversimplified and should address the traffic-generating potential of business growth in peripheral locations. There is a potential conflict between the 'vision-led' transport approach and the more liberal, 'anything goes' assumptions in other aspects of the consultation that deal with economic growth. Without careful coordination, business growth on the urban fringe may lead to increased car dependency, undermining the sustainability goals of the vision-led transport strategy. We would also emphasise the need for community involvement in shaping transport plans. Engaging local communities, including civic societies, will ensure that transport and infrastructure decisions reflect the real needs of the people who live and work in these areas. The success of this approach will rely on proper investment in public transport networks, cycling and walking infrastructure, and ensuring that these options are accessible and affordable for all.

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

Civic Voice believes that national planning policy can better support local authorities in promoting healthy communities by giving greater emphasis to health and well-being considerations in both policy and practice. While the National Planning Policy Framework (NPPF) includes a chapter on healthy and safe communities, it lacks sufficient focus on practical measures in planning practice. To address this, national policy should:

Promoting healthy communities:

- Promote active travel more explicitly: Active travel, such as walking and cycling, should be a core element of local development plans, with priority given to creating safe pedestrian and cycling routes. These routes should be away from the noise, pollution, and dangers of heavy traffic. A long-term investment programme is needed to ensure safe, clean, and accessible active travel infrastructure. In addition, planning documents should routinely include pedestrian routes from city centres to transport hubs, ensuring that walkability is prioritised in central area regeneration efforts.

- **Encourage walkable and mixed-use communities:** National policy should promote developments where homes, schools, shops, and leisure facilities are within walking distance of each other. Walkability is key to fostering active, healthy lifestyles and reducing car dependency.
- **Increase public investment in community facilities:** Developing healthy communities requires a publicly-led vision and adequate investment in local health, leisure, and fitness facilities. These should be a priority in development plans to provide accessible spaces that promote physical and social well-being.
- **People need places to go to be a community.** We have lost much of our civic infrastructure in recent years, and more support is needed for ‘community spaces’ to allow people to meet and to build a sense of community.

Tackling Childhood Obesity:

To effectively tackle childhood obesity, national planning policy must address the built environment’s impact on children’s health. Current NPPF proposals mention active travel and controlling hot food takeaways, but neither is given sufficient emphasis. Civic Voice recommends:

- **Controlling hot food takeaways near schools:** Local authorities should have clear powers to create exclusion zones for fast-food outlets near schools, including secondary schools, to limit children’s exposure to unhealthy food options. The legitimacy of such controls should be explicitly recognised in the NPPF. While this policy requires minimal public investment, it may face opposition from businesses, so strong national guidance will be essential.
- **Encouraging play-friendly environments:** Safe, accessible play areas must be integrated into both residential and commercial developments to encourage physical activity for children. National policy should guide local authorities to ensure that these spaces are a key part of urban design.
- **Improving school infrastructure for active travel:** Schools should be better equipped with walking and cycling routes that allow children to safely travel on foot or by bike. This includes designing school neighbourhoods that promote active travel, along with community-led initiatives like walking buses. Active travel to schools should be part of long-term development planning.

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

Civic Voice strongly recommends that national planning policy encourages the retention and creation of open spaces that are large enough to accommodate proper play areas, particularly in and around schools.

In many new housing developments, open spaces are often fragmented into small parcels, which are insufficient for children to engage in activities such as ball games or bike riding. This issue can be addressed through clearer guidance in design guides and codes. Under the heading of design codes, local councils are required to specify requirements for all types of new housing and development. These codes should explicitly focus on creating healthy, child-centred environments.

As current policies and market trends lead to higher-density living, particularly in urban centres, it is crucial to ensure that families with children have adequate indoor and outdoor spaces that support healthy lifestyles.

For higher-density and high-rise housing, the following considerations should be explicitly included in policy and design requirements:

- Increased minimum internal floorspace to allow children to play indoors in the absence of a garden, ensuring that homes are fit for family life.
- Enhanced minimum standards for access to green space, ensuring that children living in flats or dense urban areas have easy access to well-maintained, safe outdoor areas where they can play and be active.
- Enhanced standards for tree planting and greenery in streets, providing a more liveable and visually appealing environment that promotes well-being for all residents.

By focusing on these measures, local authorities can help create environments that support children’s physical and mental health, ensuring that urban living does not compromise their ability to grow and thrive. National

policy should make it clear that new developments must contribute to this vision by ensuring sufficient, usable green spaces and family-friendly design standards.

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

While we support onshore wind projects, they must be carefully balanced with robust mechanisms for ensuring meaningful community engagement in NSIP processes. A greater financial incentive to local communities to benefit from such schemes would also help.

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

Yes.

Civic Voice agrees with the proposed changes to the NPPF that aim to provide greater support for renewable and low carbon energy, with the additional qualification that the delivery of renewable energy projects must still respect the policy constraints associated with heritage areas and protected sites, such as Areas of Outstanding Natural Beauty (now retitled as Areas of National Landscape) and National Parks. We also agree with the changes to paragraph 160 (now paragraph 161), which directs local plans to identify suitable areas for renewable and low carbon energy generation. It is vital that these areas are identified at the local or national level before schemes are brought forward. This proactive approach ensures that opportunities for renewable energy are properly considered through the plan-making process, allowing the most appropriate sites to be identified while taking local needs and constraints into account.

Civic Voice acknowledges that the existing wording in the NPPF has acted as an effective ban on onshore wind development, which has hindered the growth of this vital renewable energy source. We agree with the government's view that while the previous bar for community consent was set too high and unfairly singled out onshore wind.

We also stress the importance of community-led energy projects, which should be actively encouraged. For this reason, we do not agree with the deletion of paragraph 161, as community-led energy schemes are a key part of empowering local communities to participate in renewable energy generation.

The strengthened weight given to renewable energy generation in paragraph 164 is also welcome.

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. Civic Voice supports additional protections for habitats such as peat soils and urges the government to adopt a precautionary, evidence-based approach to safeguarding land that offers critical carbon sequestration functions.

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? Yes

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? Yes

Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be? No comment

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

Climate change mitigation and adaption requires wide ranging policy interventions, including measures that are outside the current scope of planning and therefore not included in this Consultation. Measures to improve the energy characteristics and quality of new build and the existing stock are, for example, obvious and serious omissions from this Consultation. In relation to the existing scope of planning, future specific deliverable initiatives should include the following:

1. Local councils should be required to prepare ‘green and blue’ strategies that cover green infrastructure and bodies of water. They would include proposals and policies for urban forests, green roofs and biodiversity corridors, the preservation of existing green spaces, the promotion of new green spaces in areas of deficiency, the promotion of adequate space for water at times of high rainfall and flooding and the promotion of safe leisure uses in and around water bodies. These green and blue strategies would overlap measures to improve community health and well-being and to ensure nature recovery and would become an integral part of a local development plan.
2. To reduce car dependency, national planning policy should require new developments to be built around sustainable transport infrastructure, such as public transport hubs, cycling routes, and pedestrian pathways. Policies should ensure that developments are designed to reduce the need for car travel, supporting more walkable, transit-friendly communities.
3. The development, repair and extension of hard-standings and car parks should be better controlled to reduce surface run-off. Materials and building techniques should be used to allow water to soak into the ground. Layout should also include vegetated areas that have the same function of reducing run-off. As well as flood protection, the reduction of run-off is relevant to measures to reduce sewage discharges and to improve water quality in lakes, streams and rivers.
4. New conditions should be placed on new industrial and commercial development so that they include solar panels on their roofs or in their grounds.
5. For areas covered by an existing or planned district heating network, councils should be clearly mandated to ensure that all new development is linked to that network.
6. VAT on retrofitting is a key issue in promoting sustainability and energy efficiency in existing buildings. Retrofitting older buildings—such as adding insulation, solar panels, or improving energy efficiency—often incurs a 20% VAT charge. This discourages homeowners and developers from choosing sustainable retrofitting options over demolition and new construction. Reforming VAT to reduce or eliminate it on retrofit projects would incentivise greener building practices, help meet carbon reduction targets, and preserve the character of existing structures.

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? No comment

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness? Yes.

Yes, the rigid enforcement of existing policies to prevent and control development on sites that are classified at risk of flooding. In addition to this, it would be desirable for maps of flood risk to be made available on the planning portal of every planning authority so that developers and the public have easier access to the relevant information. Promotion of flood resilience, including greater awareness and understanding of the risks of groundwater flooding appropriate measures for mitigation .

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change? Recognising the this will create a cost implication on property owners, so may require further government support, where existing buildings are being given a new lease of life or being increased in size (out or up) it should be a requirement that the whole building be brought up to an energy efficiency level of A or B.

Question 82: Do you agree with removal of this text from the footnote? If this footnote is removed, para 180 of the NPPF should be changed to move the phrase about best and most versatile agricultural land into its own subsection to give it more prominence. And the subsection needs to include reference to the importance of retaining this land for food production, giving it significant weight in the planning balance.

Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production? If this footnote is removed, para 180 of the NPPF should be changed to move the phrase about best and most versatile agricultural land into its own subsection to give it more prominence. And the subsection needs to include reference to the importance of retaining this land for food production, giving it significant weight in the planning balance.

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? Yes

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? No comment

Question 86: Do you have any other suggestions relating to the proposals in this chapter? No comment

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

Questions 88-105 – no comment

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?

To mitigate potential impacts, we recommend:

1. **Inclusive design standards:** Ensuring that all new developments meet high accessibility standards, particularly in public spaces and housing, to support people with disabilities and the elderly.
2. **Affordable housing:** Prioritising social housing provisions to ensure that low-income families and vulnerable groups have access to suitable housing options.
3. **Community engagement:** Making consultation processes accessible to all, including providing alternative formats for information and ensuring that public meetings and forums are held in accessible venues.

We are also concerned at the timing of the Government consultation, which took place during the summer holidays, may have limited the ability of certain groups to fully engage in the process. This includes families with school-aged children, individuals who may have been on holiday or balancing additional responsibilities during this period.

To mitigate this, we recommend that future consultations avoid periods like school holidays and allow for extended consultation periods to ensure that all groups, particularly those with protected characteristics or those who may have additional time constraints, have ample opportunity to participate fully and provide their input. This would help create a more inclusive and representative consultation process.