

DRAFT reply to the NPPF consultation 2023

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<p>1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?</p>	<p>Yes. The proposed changes will reduce the pressure placed upon local authorities and free up valuable time and resources.</p>
<p>2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?</p>	<p>Yes. Simplification and the removal of a source of debate at examination is welcomed.</p>
<p>3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?</p>	<p>Yes. The proposed changes are a common-sense approach for dealing with housing supply. There are times of high development and low development, and the proposed alteration allows authorities to reap the rewards of boom periods and protects them against sudden decreases in supply. We are however, puzzled as our calculations do this already because they list each year's completions against annual need and the total fluctuates as each year produces a surplus or deficit for that year. This total is then compared to expected supply to determine if a 5YHLS exists.</p>
<p>4 What should any planning guidance dealing with oversupply and undersupply say?</p>	<p>Any policy must include, in the simplest words, the fact that historic undersupply or oversupply of housing within a plan area should be considered when evaluating the 5YHLS and incorporated into any calculations. It must highlight that this ensures the housing requirements of communities are met.</p>
<p>5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?</p>	<p>We support the proposals as it helps ensure local wishes, expressed through the NP, are protected. An NP can take a huge amount of community resources to produce, and equally many are needed to keep up-to-date. The work involved should be recognised and protected.</p>

<p>6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?</p>	<p>Yes. The proposed addition of the phrase “in a sustainable manner” to Paragraph 1 is an important and beneficial change, reinforcing the position of sustainability at the heart of planning policy. Naturally, stressing the importance of planning for the homes and services of communities is correct and should be done. However, the need for these developments to be sustainable is equally essential.</p> <p>Emphasis should also be placed on maintaining and strengthening existing local services. These services preserve the local sense of character and provide valuable resources to communities, particularly in rural location. National policy should reinforce this need for preservation rather than solely focussing on new developments and over-emphasising housing.</p>
<p>7 What are your views on the implications these changes may have on plan-making and housing supply?</p>	<p>The additional considerations regarding historic over delivery of housing are a welcome alteration to the housing supply calculation, ensuring that the needs of residents are met and reducing the potential detrimental impacts of development. Authorities should not be punished for taking advantage of growth in the housing market and over-delivering on targets while they can. This will also allow authorities to over-deliver in order to protect themselves against recessions and a sudden decrease in the rate of development.</p> <p>The changes to urban housing supply that prevent urban centres exporting housing to surrounding areas ensures that developments take full advantage of urban infrastructure and increases the sustainability of these urban centres. Development on brownfield sites needs to be incentivised to an even greater extent. Where it is in keeping with the area, there is the potential for higher-density development, with an increased emphasis on vertical growth. This maximises the efficiency of development and increases the sustainability of new housing.</p> <p>The strengthening of neighbourhood plans is also a welcome change.</p>

	<p>The housing delivery test should give more weight to the number of housing developments approved rather just focussing on net homes delivered and homes required. The current system means authorities can be punished for developer behaviour even if the planning authority is acting proactively and approving the correct number of homes. The timeframe of the test should also be expanded. Three years is a relatively short time frame that does not fully reflect historic over/ under performance or the time it takes to complete construction.</p> <p>Footnote 44 would benefit with some clarification. This appears to be saying the annual requirement provided in a Local Plan, should be replaced with that calculated using the standard method when calculating the 5YHLS. That does not seem to be consistent with the wish to support a plan led system but on an England wide basis it would result in a consistent calculation.</p>
<p>8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?</p>	<p>Yes. Policy and guidance should be clear on what constitutes exceptional circumstances. It is impossible to create a list that covers every exception, so there should be reasonable provisions for unforeseen exceptional circumstances to be considered in local housing needs.</p> <p>The demographics of an area should be considered when calculating housing need. The two discussed (university students and elderly residents) should both be considered. Where there is a high proportion of residents within these demographics, emphasis should be placed on providing specialist housing. This would reduce student's impacts on rent prices (i.e., without adequate specialist accommodation, students will be forced to rent in town, increasing demand for accommodation and rent prices) and improve the quality of life of elderly residents.</p> <p>Geographic and historic factors should also be weighted into the decision. Naturally islands have a limited supply of space, limiting development and, therefore, preventing the authority from achieving its housing need. Mountainous/ hilly regions may</p>

	<p>similarly struggle to sustainably develop new housing. Sparsely developed areas will also be harmed by significant development. The character of the area will be harmed and over-development in rural towns and villages leads to sub-optimum conditions for the current residents and potential future occupants. There is often conflict created as a result of the intensive development between existing and new residents, and between the planning authority and the communities they serve.</p> <p>However, to meet the Government's housing target will result in impact that changes character somewhere.</p>
<p>9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?</p>	<p>Yes. Amending Green Belt boundaries is a local matter. Policy needs to recognise the importance of the character and sense of place of an area and should preserve this. Therefore, weight should be given to this in order to prevent high density development that would damage the character of an area. Similarly, development that is of significantly lower density than its surrounding location should equally be prevented as this will add development pressure elsewhere, with possibly greater impact. Again these provisos, may undermine the Governments housing target.</p> <p>Past over supply needs to be very clearly expressed so there is no confusion with footnote 49</p>
<p>10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?</p>	<p>Guidance needs to define 'area'. Is it the local planning authority or more local? It also needs to say how the density calculation is made? Does it include land used for roads, open space, school grounds etc? The amount of vacant brownfield land, the amount of none green belt open land and the constraints they have on development.</p>
<p>11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?</p>	<p>Yes. A more proportionate approach will simplify the examination process and if the Government's aim is each local plan is refreshed every 5 years they will be sufficiently up to date to reduce the rigour of 'justified'.</p>

<p>12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?</p>	<p>Yes, otherwise it undermines the desire for complete and up to date local plan coverage as soon as possible.</p>
<p>13 Do you agree that we should make a change to the Framework on the application of the urban uplift?</p>	<p>Yes. The 35% uplift should remain in place and should be applied where possible. If there is a lack of brownfield land or if the increase in density would significantly conflict with the character of the area, then the uplift may have to be relaxed. However, exporting homes to surrounding authorities may raise similar issues and undermine the Government's housing target.</p>
<p>14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?</p>	<p>There is the potential to introduce policy that states that although the uplift applies and the housing needs of the area is great, that developments must still meet the sustainable development targets and achieve the standard of beauty that has been emphasised in these policy reforms. It should also be reiterated that development that is significantly out of keeping with the area should not be approved regardless of the housing need. This could be because of a proposed density significantly above the existing density or a poorly designed proposal that does reflect the density but is out of character in other ways. This ensures high quality development and prevents the uplift being abused by developers.</p>
<p>15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?</p>	<p>Neighbouring urban authorities will already be integrated into the economy of the core and are fundamentally linked with the core. Therefore, the housing needs of the core should be reflected onto these semi-peripheral regions. There is the potential, through strategic partnerships and cooperation, for these neighbouring authorities to receive a proportion of the core's housing requirements. This will ensure adequate competition and that the most optimum sites are selected. It also prevents poor quality developments being approved in the core simply to meet the 35% uplift target.</p>
<p>16 Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to</p>	<p>Yes. The proposal allows for authorities to adapt more easily to the proposed changes and reduces the potential for delays via plans being rewritten.</p>

take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?	
17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?	No. The policies referenced are now greatly outdated.
18 Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?	Yes. The current system can potentially punish planning authorities for the behaviour of developers. The system should acknowledge where planning authorities have acted proactively and have granted the necessary permissions to achieve the housing supply. There should also be policy to prevent authorities being punished where failure to meet the housing supply is due to a lack of suitable applications e.g. as a result of an economic downturn.
19 Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?	Yes. Our local plan inspector applied a 10% lapse rate and so this rate is more rigorous, but is considered reasonable.
20 Do you have views on a robust method for counting deliverable homes permissioned for these purposes?	The figure can be derived from the monitoring tables that record the number of homes approved and can be sorted by year of approval
21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?	Apply from the publication of the 2023 HDT.
22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?	Yes. This is the most affordable type of social rented housing. We have been lucky enough to be one of the areas where Homes England would support Registered Providers to develop and deliver new social rented properties. In relation to planning policies we could seek social rented properties instead of affordable rented properties as the S 106 planning contribution, however this would likely impact on the viability of market schemes so we may have to accept a reduced planning contribution as developers would get less for social rented properties from RP's than they do for affordable rented properties. This would also need to be discussed with RP's to assess their appetite for the social rented S106 contributions. It is currently proving problematic finding RP's that are able to acquire S106

	<p>planning contributions due to the often small number of properties involved. They are focussing on their own all affordable housing schemes as this provides them with the numbers they need.</p>
<p>23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people’s housing?</p>	<p>Yes. We could support more lifetime homes through planning policy but this will also impact viability. The development of specialist OP housing needs supporting, however it needs finance to make the schemes viable as they are expensive.</p>
<p>24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?</p>	<p>Small scale builds play an important role in delivering housing, and there is the potential to incentivise these builds through alterations to policy. Extra emphasis should be placed on smaller scale projects to provide specialist housing. Policy can reiterate that these applications should be looked upon favourably by the planning authority, unless the development significantly contradicts an existing policy.</p>
<p>25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?</p>	<p>It should be stated that small scale developments that focus on affordable or specialist housing are looked upon favourably by the planning authority, unless there is significant departure from existing policy.</p>
<p>26 Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and Almshouses – to develop new affordable homes?</p>	<p>Yes. The definition should be amended. There is a significant need for affordable housing for rent and widening the number of potential providers will help to meet these needs. However, there may be a need for measures to avoid unscrupulous development.</p>
<p>27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?</p>	<p>The current policy is acceptable.</p>
<p>28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?</p>	<p>Community groups should be given priority on exception sites for the development of affordable homes. Community groups should be offered the land before other prospective developers in order to ensure the best quality development for the community is in place. If there are two applications for development on an exception site, the priority should be given to community groups as long as the application is for affordable homes.</p>

<p>29 Is there anything else national planning policy could do to support community-led developments?</p>	<p>Encourage discussion and a relationship between community groups and Local Planning Authorities in order to ensure their development conforms with local development policy. Fostering good relations will increase community trust in the planning authority and will increase engagement when creating local planning policy.</p>
<p>30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?</p>	<p>Yes, for legitimate planning issues that have involved the Enforcement team. None compliance with conditions, carrying out development without the necessary planning permission, felling of trees, clearing Bio diversity Net gain evidence. Developers with a proven track record of delivering high quality housing should be looked at more favourably.</p>
<p>31 Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?</p>	<p>On the face of it Option 2 would be the most effective because the application is not accepted and so should encourage good behaviour. However imposing this maybe considered harsh and challengeable in court, either against the Council, or the Government through this adoption process. It raises the question who is to blame? Is it the developer's modus operandi or was it the site manager? A different site manager may not have tarnished the developer's image. For a Limited Co who do you blame? An alternative approach would be for Breach of Condition Notices to carry a fixed fine in the way of a fixed penalty and ongoing daily fine until the 'breach' has been remedied. Any retrospective planning application that is required to 'authorise' development should attract double fee. The fines and fees accrued should be retained by the Council and ring-fenced for future monitoring of developments which would encourage this area of planning enforcement to be better prioritised by Councils.</p>
<p>32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?</p>	<p>Naming and shaming may help encourage completion rates. The success of the interplay between a) and c) will depend on what 'maybe refused in certain circumstances' means.</p>

	<p>The potential for developers to rush the building process and deliver low quality development as a result of increased pressures to develop quickly may be tempered by Qu30.</p>
<p>33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?</p>	<p>Yes, focusing on having attractive yet practical development is key for maintaining and enhancing the sense of place of a location. However, there is the potential for this policy change to add an additional layer of subjectiveness to the planning process. While the design codes do help, they do not fully eliminate subjectiveness from the process.</p> <p>The issue is; what is beautiful, as opinions will differ.</p>
<p>34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?</p>	<p>84/86a includes beautiful that is not a tracked change, This appears to be 124/126e.</p> <p>The addition of the word beautiful may reduce the potential for development that is practical and attractive but not beautiful. The meaning of beautiful is somewhat subjective and has a relatively small scope (a development can be attractive and visually appealing without being beautiful).</p> <p>The additional emphasis on creating good looking development is greatly appreciated and needed, but the word beautiful is potentially a misstep.</p>
<p>35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?</p>	<p>We condition planning permissions to be carried out in accordance with the approved plans that results in modifications requiring a S73a application. The issue is being able to require better designs / clearer drawings to show the intended development so that enforcement is based on clearer information. Also being mindful that these conditions still need to be precise and understandable.</p>
<p>36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?</p>	<p>The issue in the context of good design / beauty is the first upwards extension in a terrace will look awful because it is the first. The other issue that is not mentioned is the impact on foundations and how upgrading those affects neighbours. It is doubtful this approach would happen in low value areas where overcrowding may be highest. Concern whether this is over prescriptive for a national planning document where a Mansard Roof is a very</p>

	specific type of design style that may not be appropriate outside of dense, urban areas.
37 How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?	BNG Policy should make the incorporation of swift/bee bricks and bat/ bird boxes commonplace in developments. They are reasonably cheap products so that being mandatory for all developments would not be too costly and may compliment other BNG measures. Artificial grass in new development has no ecological benefit and undermines BNG and so may be used less as a result. Banning it in existing developments may result in other unhelpful surfaces being used: tarmac, concrete, decking.
38 Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?	Yes. However, councils where nearly all agricultural land is grade 1, 2, 3a have a difficult decision since 3a may not be against a settlement where new allocations are sensible. The issue has more local relevance for solar schemes. Although, land may benefit from a 30+ year fallow period the issue with solar is identifying agricultural practices that can co-exist with solar. Sheep grazing is common but might be free range chickens or fruit growing on bushes, cordon apple trees, subject to soil conditions. However, the farmer may not have these skills as the land was previously cultivated with large machinery for wheat, oil seed, potatoes, brassicas etc. The solution <u>will require market encouragement</u> for alternative crops so that farmers may rent their land to a solar electric generating company and a grower who has appropriate husbandry or horticultural skills. The solar scheme will need to be suitably designed for other crops to co-exist and this might be encouraged through government energy and agricultural policy.
39 What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?	Carbon emissions are already measured nationally for domestic, industrial, land use change and transport for climate change purposes. Can data from the industrial data identify emissions attributable to cement manufacture, brick/block making, steel that is used in construction? Can the emissions for transporting these products and the on site workforce travelling to work be identified

	<p>or approximated from the transport data? The domestic data identifies the emissions from the housing stock. Building Regulations will reduce emissions so can a figure be derived from this. As part of the BNG work is there a carbon sequestration metric?</p>
<p>40 Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?</p>	<p>The NPPF and NPG need to draw the building design, urban design, flood risk and its amelioration, landscaping, bio diversity net gains and nature based solutions together in a narrative that makes it clear the approach government is requiring development to take as its contribution to adapting to and ameliorating climate change as well as contributing to the Governments carbon reduction targets. They all interrelate and will assist in urban cooling, water management, habitat creation with consequent bio diversity improvements and open space that will also contribute to health and well – being.</p> <p>This will underline to developers or local planning authorities that previous approaches to development must change.</p>
<p>41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?</p>	<p>Yes. Extending the use of existing wind farm sites is sensible</p>
<p>42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?</p>	<p>Yes. Extending the use of existing wind farm sites is sensible</p>
<p>43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?</p>	<p>The word “overwhelming” should be added to both footnotes. This will quantify community support and ensure that the community is sufficiently satisfied with the proposal. Otherwise, the views of a minority may overwhelm that of the majority.</p> <p>Potentially include a reference to local groups in footnote 62. This will help ensure institutions such as wildlife/ nature groups are also fully satisfied.</p>
<p>44 Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?</p>	<p>Yes. Additional support is needed to help ensure residences/ businesses can become more energy efficient.</p>
<p>45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared</p>	<p>Comments: The SELP covers both the East Lindsey Local plan and the South East Lincolnshire Local Plan (SELP). The East Lindsey LP is</p>

<p>under the current system? If no, what alternative timeline would you propose?</p>	<p>5 years old in July 2023. The SELP is 5 years old in march 2024. We will not be able to advance either new local plan until we have more up to date flood risk data as we will not be able to select allocations for consultation. Our flood risk mapping is 12 years old. The EA are working on an update of their flood risk mapping at this time and we are told it will be at least a year until it delivers outputs that could be useful to inform an SFRA that we could then use for selecting suitable sites for allocations.</p> <p>The East Lindsey Local Plan is likely to hit the deadline. However the SELP is unlikely to meet the 30 June 2025 deadline and will have to employ the new local plan process. However, because our plan is 5 years old before the new system comes into being it will not be considered 'up to date' and we will be open to speculative development based on the tilted balance and will have to depend on a 5 year supply figures. This would not be the case if our plan was 5 years old 9 -12 months later. Being open to speculative development when the SFRA is out of date is not sensible given the impact a flood event could have. We request the protection against speculative development is amended to include our situation.</p>
<p>46 Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?</p>	<p>Yes, except the 'out of date' impact on local plans that are 5 years old before the new local plan system comes into being.</p>
<p>47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?</p>	<p>Yes. The scope seems appropriate.</p>
<p>48 Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?</p>	<p>Yes. The scope seems appropriate.</p>
<p>49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?</p>	<p>The NPPF requires development to be sustainable and climate change to be addressed. These objectives should frame what national development policies are provided so there is a national</p>

	<p>thread from policy to implementation. Scope 2 seems to cover this and the others are also appropriate. The principles make sense.</p>
<p>50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?</p>	<p>The current principles are sufficient.</p>
<p>51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?</p>	<p>Yes. This would be welcome as it removes the need for each local planning authority in England writing their own version of a policy topic.</p>
<p>52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?</p>	<p>The topic list includes allotments. The GI Framework has recently been launched so there may be policies required to implement this. A policy limiting isolated homes would improve clarity for developers and cement that development in unsuitable locations is not acceptable. Many local policies and the NPPF mention these isolated developments and limit them, but a National Development Management Policy would provide a useful baseline to ward off inappropriate development, which also links to sustainability and climate change.</p> <p>A policy to ensure all new housing developments must be accessible by sustainable transport. This should be extended to rural developments as well as the urban developments mentioned in the text prior to this question. This should link to a national plan to improve bus and rail networks, including electrification.</p>
<p>53 What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?</p>	<p>Mission 7 and 8 are Health and Well-being. Access to good quality open space helps these two missions as somewhere to exercise and also by achieving access to nature that can help mental health and well-being. Policies need to protect and expand existing provision, which links the GI framework referred to in Qu52 and sustainable development in Qu49.</p> <p>Mission 9, 10 and 11 are touched on by design and existing first home policies.</p> <p>R & D is within Class E, so if these are to be encouraged they need to be protected from being changed to other class E uses, else there will be more retail on employment allocations.</p>

<p>54 How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?</p>	<p>The NPPF could greatly expand section 6 and 7 to further support sustainable economic development. However, this also depends on good transport links that in rural areas are challenged by low density and greater distances. Planning applications can already seek S106 contributions for improvements that are warranted by the development's impact. Beyond this and to achieve better, cheap, low emission transport requires a government funded programme to drive innovations.</p>
<p>55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?</p>	<p>Yes. The NPPF should insert further policies that emphasise and give great weight to development on brownfield sites. Emphasis should also be placed on developments that utilise these sites to their fullest, whether through gentle densification of developments or reuse/ preserving historic sites.</p> <p>Increased sustainability can be achieved by encouraging these denser sites to incorporate services into their development. Weight can be given through design codes and NPPF alterations to encourage new developments to incorporate shops and offices into new housing developments. In urban areas this would be especially effective. It is important these developments are incorporated into the wider area, rather than just creating closed ecosystems.</p>
<p>56 Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?</p>	<p>Yes. This is part of the social objective of sustainable development.</p>
<p>57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?</p>	<p>Text and web access will be influenced by accessibility standards outside planning.</p>
<p>58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.</p>	<p>No Comments</p>

LP under existing system	Spring '23 NPPF changes made	Late '24 New local plan system introduced	30 June '25 Deadline to submit new LP for examination. (Need DtC)	31 Dec '26 Deadline for new LP to be adopted
LP under new system	Spring '23 NPPF changes made	Late '24 SELLP over 5 yrs old at this time. We will HAVE to commence a new plan straight away. Our plan will NOT be considered 'up to date'. If it was 5 yrs old in mar 25 it would have been. We will therefore be open to speculative development and therefore 5YLS important.	30 June '25 If can't meet this date, will prepare under new system which will change DtC rules.	Early / mid '27. Deadline for new LP to be adopted Have 30 months to adopt new plan. Sanctions not specified. It is assumed they will be via the tilted balance.