

Appendix 1 – Response to ‘Draft revised National Planning Policy Framework’ consultation

Question 1

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

Answer

No. It is noted the revised text reflects previous announcements.

Question 2

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

Answer

The requirement to automatically say that strategic plans should as a minimum meet any needs that cannot be met within neighbouring areas does not take into account the additional requirement that some local authorities are required to meet under the new standard methodology for calculating housing need.

Support the focus on objectively assessed needs for other development alongside housing.

Question 3

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

Answer

So long as the emphasis of the core principles is not lost. Embedding these within the document should strengthen their application in planning decisions.

Question 4

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

Answer

Support the statement that ‘Neighbourhood plans should support the delivery of strategic policies contained in local plans’ and ‘should shape and direct development that is outside of these strategic policies’, where this is undertaken in a positive manner.

Question 5

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

Answer

Support the amendment to the tests for a ‘sound’ plan where the requirement is to set out an appropriate strategy and based on proportionate evidence.

Support the need to review policies every five years, but if the requirement is to have an adopted plan five years after the previous one, this could result in an increased pressure on finances and resources required to ensure this is met.

Concern that whilst it is recognised as a good idea to front-load the infrastructure and viability information required for particular sites at the plan-making stage, this could result in a disproportionate amount of resource and cost being required, which has the potential to lengthen the time it takes to produce plans.

Question 6

Do you have any other comments on the text of Chapter 3 (Plan-making)?

Answer

No, as the comments made in respect of Chapter 3 are in the answer to Question 5.

Question 7

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

Answer

Support all viability assessments being made publicly available.

Question 8

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

Answer

Yes.

Question 9

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

Answer

To get a consistent approach to capture uplift so it is not a matter of debate.

Question 10

Do you have any comments on the text of Chapter 4 (Decision-making)?

Answer

Whilst it is supported that development accords with all the relevant policies in an up-to-date development, a viability assessment may be required to reflect changing infrastructure costs depending on when a planning application is determined.

Question 11

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

Answer

Support the proposal that local authorities should seek to allocate sites for housing in their plans of half a hectare or less. Question how the 20% requirement of all sites allocated was derived.

Question 12

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

Answer

Whilst a target for housing delivery in principle is a good idea, feel 75% is high, particularly in areas that have seen a large uplift in the housing requirement as a result of the standard method for calculating housing need. How has the 75% figure been derived?

Do not agree with the presumption in favour of sustainable development being applied as the actual delivery of homes is largely outside the control of the local planning authority, e.g. build rates.

Question 13

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

Answer

As long as the market housing meets a need identified locally, e.g. downsizing accommodation for older people, and being proportionate to cross-subsidise the provision of affordable homes. Community Land Trusts are a good example of facilitating delivery in this regard.

Question 14

Do you have any other comments on the text of Chapter 5 (Delivering a sufficient supply of homes)?

Answer

Support the proposal that the five-year housing land supply should be capable of being agreed for a one-year period.

Do not support the suggestion that the New Homes Bonus could be linked to the housing delivery test or the standard approach to local housing need. This could have severe financial consequences for local planning authorities, when delivery is largely controlled by others in the development sector.

Support the proposal that authorities should consider imposing a planning condition to bring forward development within two years and Babergh and Mid Suffolk District Councils have been doing this. It is also important that applicants are transparent about their intended build programme.

Support the proposal that existing isolated homes in the countryside can be subdivided.

Concern that the requirement for 10% affordable home ownership is the default position unless exemptions can be justified, and this will have an impact on the amount of rented homes being delivered. Suggest the current approach allows for the delivery of affordable housing to meet identified needs.

Question 15

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

Answer

Agree with the changes to strengthen support for business growth and productivity, as long as it respects the character of the countryside and does not lead to inappropriate and unsustainable development, and does not have an unacceptable impact on local amenity.

Question 16

Do you have any other comments on the text of chapter 6 (Building a strong, competitive economy)?

Answer

The NPPF should offer protection for existing employment land and premises as well as recognition of the needs of existing businesses on established, defined sites, which are viable for employment purposes.

Question 17

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

Answer

Support the 'sequential approach' to allocating sites for town centre uses where out-of-centre sites are only considered if suitable town centre or edge of centre sites are unavailable within a reasonable period. It is noted that policies should look ten years ahead, however greater clarity is required on what is a reasonable period.

Question 18

Do you have any other comments on the text of Chapter 7 (Ensuring the vitality of town centres)?

Answer

It is necessary to recognise that ground floor frontages in defined town centres are important for commercial uses.

Question 19

Do you have any comments on the new policies in Chapter 8 (Promoting healthy and safe communities) that have not already been consulted on?

Answer

Note the additional recognition that planning can play in promoting social interaction and healthy lifestyles through active street frontages, the provision of safe and accessible green infrastructure, and local shops for example, and that this needs to be strengthened further to reflect that higher density development is not always appropriate in certain locations.

Question 20

Do you have any other comments the text of Chapter 8 (Promoting healthy and safe communities)?

Answer

No, as the comments made in respect of Chapter 8 are in the answer to Question 20.

Question 21

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

Answer

Agree that all aspects of transport should be considered, both in planning for transport and assessing transport impacts. However, it is important to recognise in rural locations there may be limited opportunity to encourage all aspects of transport provision.

Question 22

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

Answer

Not applicable.

Question 23

Do you have any other comments on the text of Chapter 9 (Promoting sustainable transport)?

Answer

No, as the comments made in respect of Chapter 9 are in the answer to Question 21.

Question 24

Do you have any comments on the text of Chapter 10 (Supporting high quality communications)?

Answer

Support the emphasis on high quality communications infrastructure, however the success of its delivery will often be the willingness of the infrastructure provider to undertake this.

Question 25

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

Answer

Support the effective use of land, however the use of brownfield land for housing should be in appropriate locations where there is not a detrimental effect on residential amenity.

Question 26

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

Answer

Support this approach in established urban areas of a significant scale that are not subject to other constraints such as heritage.

For market towns and villages that are well-connected by public transport services, there is a risk this would compromise well-designed places.

Question 27

Do you have any other comments on the text of Chapter 11 (Making effective use of land)?

Answer

It is important to recognise there is also a need to safeguard existing jobs and industry.

Question 28

Do you have any comments on the changes of policy in Chapter 12 (Achieving well-designed places) that have not already been consulted on?

Answer

No. Good design continues to be embedded within the National Planning Policy Framework.

Question 29

Do you have any other comments on the text of Chapter 12 Achieving well-designed places)?

Answer

No. Good design continues to be embedded within the National Planning Policy Framework.

Question 30

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

Answer

Not applicable.

Question 31

Do you have any other comments on the text of Chapter 13 (Protecting Green Belt land)?

Answer

Not applicable.

Question 32

Do you have any comments on the text of Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)?

Answer

No. It is noted the revised text reflects previous announcements.

Question 33

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

Answer

Local requirements for the sustainability of buildings should be allowed to go above the Government's policy for national technical standards where it is proven these can be delivered.

Question 34

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

Answer

Support the approach to strengthening protection for areas of particular environmental importance and in particular additional policy on strengthening existing networks of habitats.

Question 35

Do you have any other comments on the text of Chapter 15 (Conserving and enhancing the natural environment)?

Answer

No. Note the continued focus on enhancing the local and natural environment.

Question 36

Do you have any comments on the text of Chapter 16 (Conserving and enhancing the historic environment)?

Answer

No. Note the continued focus on conserving and enhancing the historic environment.

Question 37

Do you have any comments on the changes of policy in Chapter 17 (Facilitating the sustainable use of minerals), or on any other aspects of the text of this chapter?

Answer

No. Suffolk County Council are the lead authority on minerals planning in Suffolk.

Question 38

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

Answer

No comment as Suffolk County Council are the lead authority on minerals planning in Suffolk.

Question 39

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

Answer

No comment as Suffolk County Council are the lead authority on minerals planning in Suffolk.

Question 40

Do you agree with the proposed transitional arrangements?

Answer

Do not agree with the Housing Delivery Test proposal of less than 75% delivery of the housing requirement resulting in the application of the presumption in favour of sustainable development from 2020.

Question 41

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

Answer

No comment. Any changes deemed necessary should be proposed alongside this consultation.

Question 42

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

Answer

No comment. Any changes deemed necessary should be proposed alongside this consultation.

Question 43

Do you have any comments on the glossary?

Answer

No, as this has been amended to reflect changes throughout the National Planning Policy Framework.