

Appendix 1: Proposed consultation response to the NPPF

No:	Question and Response
1	<p>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>Response</p> <p>Agree - paragraph 5 of chapter 3 of the consultation confirms that when making plans, LPAs will need to identify a robust and deliverable 5-year housing land supply from the intended date of adoption and this, along with the requirement to review local plans every 5 years, is sufficient to ensure that a Council has an appropriate supply of land. Clarity is needed on whether housing requirement should include communal accommodation.</p>
2	<p>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>Response</p> <p>Disagree. Buffers would only be required in relation to 5YHLS calculations for councils with plans that are more than 5 years old, where there is less certainty regarding housing delivery. If there is no requirement for a buffer then the penalties for councils that do not deliver housing as anticipated are limited to the preparation of Housing Delivery Action Plans. Clarity is needed on whether 5YHLS calculations should include communal accommodation as they are included for the HDT results. Currently two different methods are used for the 5YHLS calculations and HDT calculations. Ideally they should be consistent.</p>
3	<p>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>

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	<p>Response</p> <p>Agree. Whilst the standard method should be the starting point for calculating housing targets, account should also be taken of previous under and over supply. It is noted that the changes to the paragraph 75 (was 74) of the NPPF refer to both previous under and over supply. This should apply to plan making preparation as well as calculating 5YHLS. Clarity is needed on whether 5YHLS calculations should include communal accommodation.</p>
4	<p>What should any planning guidance dealing with oversupply and undersupply say?</p>
	<p>Response</p> <p>Comment - the guidance should provide clarity on how the under or over supply should be calculated and in particular the period that should be taken into account (such as from the start of the plan period or within the 5YHLS period). The guidance should also provide clarity on how 5YHLS calculations should include communal accommodation.</p>
5	<p>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>Response</p> <p>Agree with proposal to bring timescales in line with five year review period for Local Plans where they include allocations for development.</p>
6	<p>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>

No:	Question and Response
	<p>Response</p> <p>Agree. It is noted that the additions to paragraphs 1 and 7 of the NPPF emphasise the provision of development 'in a sustainable manner'. It is noted that the requirement for new development to be located in sustainable locations is reiterated in footnote 30, which states that 'brownfield and other under-utilised urban sites should be prioritised'. This approach is welcomed and helps resist inappropriate development on brownfield sites in isolated locations. Consider the use of "sufficient" in paragraph 1 is ambiguous and requires qualification.</p>
7	<p>What are your views on the implications these changes may have on plan-making and housing supply?</p>
	<p>Response</p> <p>Comment - concern is expressed over a potential slow down with plan-making with the intended requirement to review the implications of the Census 2021 data on the standard method on new household projection data which is not due to be published until 2024. Agree with concerns over the pace of delivery at some sites which have been granted planning permission but not delivering and potential for being exposed to speculative development. Would welcome further guidance as to how local constraints can be taken into account and support a more proportionate approach to local plan examination.</p>
8	<p>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>Response</p> <p>Agree.</p>

No:	Question and Response
9	<p>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>Response</p> <p>Comment - whilst we welcome the recognition that reviewing Green Belt boundaries should be at the discretion of local planning authorities, we would wish to see clarification of the exceptional circumstances that would enable authorities to review and alter Green Belt boundaries if they so wish.</p> <p>For Green Belt authorities (where all land outside of the built up area is designated as Green Belt), opportunities to bring forward land for housing may be extremely limited if Green Belt boundaries are not altered. For Gedling Borough Council, the future supply of land that is not currently allocated or have the benefit of planning permission comprises approximately 500 dwellings (compared to the current target of 7,950 homes from 2022 to 2038). Whilst the emphasis on bringing forward brownfield sites is supported, for Gedling Borough Council the capacity of brownfield sites outside of the Green Belt is only 57 dwellings. It would be helpful to understand if this restricted supply of housing sites would constitute an 'exceptional circumstance' for altering Green Belt boundaries.</p> <p>Agree with the need to present evidence to ensure density of development is not out of character with the existing area and use should be made of principles in local design guides or codes. However, for a number of local authorities coding is only just emerging so the transition period will require careful management.</p> <p>Agree that whilst the standard method should be the starting point for calculating housing targets, account should also be taken of previous under and over supply. It is noted that the changes to the paragraph 75 (was 74) of the NPPF refer to both previous under and over supply. This should apply to plan preparation as well as calculating 5YHLS.</p>

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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>Response</p> <p>Agree with need to present evidence to ensure density of development is not out of character with the existing area and use should be made of principles in local design guides or codes. However for a number of local authorities coding is only just emerging so the transition period will require careful management.</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>Response</p> <p>Agree to a proportionate approach to evidence at examination, but given the move to more democratic engagement with communities on local plans the evidence needed to inform and explain a local plan will need to be sufficient to anticipate comments raised.</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>Response</p> <p>Agree. Plans which have reached an advanced stage of preparation have been prepared against the tests of soundness set out in paragraph 35 of the existing NPPF 2021 version and the evidence base would reflect this context. Therefore plans at an advanced stage should be tested against the</p>

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	original tests of soundness which would also reduce the risk of delaying plans.
13	Do you agree that we should make a change to the Framework on the application of the urban uplift?
	<p data-bbox="288 622 443 656">Response</p> <p data-bbox="288 719 1353 864">Agree. We welcome the proposed text in (new) paragraph 62 of the NPPF and the associated footnote 30, which confirms that the uplift should be accommodated within those cities and urban centres themselves unless it would conflict with the policies in this Framework and legal obligations.</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 data-bbox="288 1218 443 1252">Response</p> <p data-bbox="288 1314 1378 1715">Comment - we consider that the local authorities concerned are in the best position to consider the case for planning for more homes in urban areas where the uplift applies. Assuming most local authorities subject to the uplift are positive about accommodating additional housing we would consider it more important that the objective of sustainable development is not undermined through arbitrary targets to uplift housing numbers in a relatively small number of authorities. In this context in addition to encouraging gentle densification to encourage more homes in these urban areas the NPPF could clarify how to justify where uplift should not be accommodated. For example, such considerations should include but not be limited to the following:</p> <ul data-bbox="336 1783 1378 1998" style="list-style-type: none"> <li data-bbox="336 1783 1378 1850">• The need to balance maximum development of housing whilst maintaining quality of life, employment and leisure opportunities <li data-bbox="336 1854 1378 1921">• Provide sufficient employment opportunities in the context of a constrained employment land supply <li data-bbox="336 1926 1378 1998">• To avoid increasing density that would not be in keeping with local character and lead to town cramming

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	<ul style="list-style-type: none"> • To prevent unacceptable pressure being placed on green space and public open space needed to meet the recreational needs of the population • To prevent unacceptable pressure on existing services and infrastructure • The need to ensure that incompatible uses that are noise sensitive are not located close to potential sources of noise such as entertainment venues in town centres • To avoid flood risk. • Embracing opportunities to build higher but respecting local character and the townscape.
15	<p>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>Response</p> <p>Comment - the proposed paragraph 62 (new) of the NPPF adequately addresses the issue by confirming that the uplift should be accommodated within those cities and urban centres themselves 'unless it would conflict with the policies in this Framework and legal obligations'. It would be a matter for an adjoining authority to consider if there is available capacity within their associated built up areas (over and above what is needed to meet their own needs). It is important that the City's undersupply (including the 35% uplift) is not provided in unsustainable locations within adjoining authorities.</p>
16	<p>Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?</p>
	<p>Response</p> <p>Agree that use of a four year rolling supply would be helpful but note the lack of consistency as it is viewed that account should be taken of over and under supply. The framework needs to be clear about the where the period would</p>

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	<p>start from either the start of the plan period which is preferred as it would be more efficiently deal with over supply or the start of the financial year.</p>
17	<p>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?</p>
	<p>Response</p> <p>Comment - consider that the additional guidance on constraints such as Green Belt should apply to plans continuing to be prepared under the transitional arrangements as this will provide confidence to Councils to continue to progress with their plan-making with the anticipation that such an approach would receive support at examination. Concern is expressed that without this confirmation there will be a delay with plan-making.</p>
18	<p>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?</p>
	<p>Response</p> <p>Agree, this is a reasonable approach because this demonstrates deliverable sites with planning permission that will come forward. This is a 'forward look' approach compared to the current 'backward look' approach where the HDT results look at past performance i.e. number of homes built against the number of homes required in the previous three years. Alternatively 5YHLS, which only include deliverable sites, could be used if the proposed approach not have to continually demonstrate a deliverable 5-year housing land supply for as long as the housing requirement set out in its strategic policies is less than 5 years does not happen.</p>

No:	Question and Response
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?
	<p>Response</p> <p>Agree, although the local housing need figure should be the figure for that year in the cases of a stepped trajectory. The number of homes should be used, not the number of decisions on planning applications.</p>
20	Do you have views on a robust method for counting deliverable homes permitted for these purposes?
	<p>Response</p> <p>Comment - this should equate to the number of homes permitted as recorded in the Council's DELTA return. See above response to Q19.</p>
21	What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?
	<p>Response</p> <p>Comment - The 2022 Housing Delivery Test results should be published and the consequences should be suspended until the revised approach is established.</p>
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,

No:	Question and Response
	do you have any specific suggestions on the best mechanisms for doing this?
	<p>Response</p> <p>Agree – a minimum target like First Homes could be set to ensure more delivery.</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>Response</p> <p>Agree.</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>Response</p> <p>Comment - the role of small sites in maintaining a range and choice of housing sites is recognised. However, a wide variety of issues are already taken into account in assessing whether a site is suitable for development and the requirement to accommodate at least 10% of the housing requirement on sites no larger than one hectare shouldn’t artificially limit the number of sites over one hectare that are included in the housing supply. While the 10% target has not been an issue in the past, for Green Belt authorities (where all land outside of the urban area is designated as Green Belt) the supply of sites will be significantly constrained in the future and it will become more difficult to achieve this target. This scenario should be confirmed as an acceptable reason why the target cannot be achieved.</p>

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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>Response</p> <p>Comment - please see response to question 24. The current NPPF at paragraph 65 states that provision of affordable housing should not be sought for residential developments that are not major developments where the Development Management Procedure Order (2015) defines major residential schemes as 10 dwellings or more or where the housing numbers are not known on sites of 0.5 hectares or more. Paragraph 65 would therefore need amending to allow affordable housing on smaller sites. In Gedling Borough the Local Plan requires affordable housing on sites of 15 dwellings or more and First Homes are now also required on sites accommodating 10-14 dwellings.</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>Response</p> <p>Agree if this would encourage the delivery of more affordable housing, subject to the other conditions included in the current drafting being met.</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?
	Response

No:	Question and Response
	No comment.
28	Is there anything else that you think would help community groups in delivering affordable housing on exception sites?
	<p data-bbox="288 584 443 622">Response</p> <p data-bbox="288 680 475 719">No comment</p>
29	Is there anything else national planning policy could do to support community-led developments?
	<p data-bbox="288 1037 443 1075">Response</p> <p data-bbox="288 1133 475 1171">No comment</p>
30	Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?
	<p data-bbox="288 1485 443 1523">Response</p> <p data-bbox="288 1581 1378 1798">Disagree. It would be very difficult to apply in practice and there would be a significant risk of legal challenge. It is a long standing principle that planning decisions should be based on the planning merits of the proposed development. How would "irresponsible" behaviour be defined as it is highly subjective? Equally, how would a developer reform and demonstrate more acceptable behaviour?</p>

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31	Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?
	<p>Response</p> <p>Whilst we disagree with the principle that an applicant's past behaviour should be taken into account into decision making, for the reasons set out under Q30, the preference is for option 2. Discussion around an applicant's past behaviour should be treated as a separate issue from the merits of a specific planning application, and option 1 introduces links between the two issues. The option for local planning authorities to decline to determine should be the last resort and national planning guidance should set out clearly the types of behaviour that are defined as being unreasonable.</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>Response</p> <p>Comment - in response to (a), it would be difficult to determine what constituted a slow build out rate. For example, slow build out may be a result of a number of factors including availability of materials or labour, issues arising through consultation or site investigation that were not previously apparent, other factors outside of the control of the developer. There is a concern that the onus would be on planning officers to verify justification for delays as put forward by developers, which would be time consuming and stray into issues outside of planning. A further concern is that it could act as a disincentive for some developers to develop "difficult" sites.</p> <p>In response to (b), housing tenures included as part of a larger scheme should accord with the Council's Housing Needs Assessment rather than being driven by delivery rates.</p> <p>In response to (c), the submission of trajectories as part of planning applications is welcomed and would support the 5YHLS as well as the</p>

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	<p>Council's SHLAA process. However, it is important that trajectories are realistic and reflect the site characteristics as well as the availability of materials/labour, which may change in the period between permission being granted and work commencing on site. Trajectories should be submitted with full and outline planning applications.</p> <p>A more effective approach may be to require the default commencement timeframe for full permissions to reduce from three years to two. For outline permissions, it is suggested that the timeframe for the submission of applications for approval of reserved matters should be reduced from three years to one year and development should commence not later than one year from the date of approval of the last of the reserved matters to be approved.</p>
33	<p>Do you agree with making changes to emphasise the role of beauty and place making in strategic policies and to further encourage well-designed and beautiful development?</p>
	<p>Response</p> <p>Agree with approach to encourage well designed places but consider the use of the term "beauty" is subjective and could be misunderstood. Further clarity is required on the link between good design and beauty and welcome the changes made in Chapters 6, 8 and 12. The proposal to consult on secondary legislation so that existing permitted development rights with design or external appearance prior approvals will need to take into account design codes where they are in place locally is welcomed. However it is viewed that unambiguous language such as "meet the requirements" of the design code should be employed.</p>
34	<p>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>Response</p>

No:	Question and Response
	<p>Disagree. Whilst we welcome the emphasis on well-designed places, the introduction of the word 'beautiful' introduces subjectivity into decision making which can cause confusion. The principles of good design can clearly be set out in Design Codes and a developer can understand from the outset what elements of design are likely to be acceptable in particular geographic area. Focussing instead on beauty creates uncertainty for developers and communities alike, leading to delays in determining planning applications and dissatisfaction from communities if they are unable to understand why an application is granted that they do not perceive to be beautiful.</p>
35	<p>Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?</p>
	<p>Response</p> <p>Agree, greater visual clarity on design requirements set out in planning conditions with reference to clear, accurate plans/drawings and use of materials is supported although this is already generally current practice.</p>
36	<p>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>Response</p> <p>Agree. Allowing upward extensions in a managed way is conditionally supported as there is a need to prevent harmful impact on the character of the local area. It will assist with the aim of achieving gentle density but it is considered that it would be more appropriate in main urban areas.</p>

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37	<p>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?</p>
	<p>Response</p> <p>Agree. Whilst the NPPF should encourage local planning authorities to set out specific requirements for nature interventions in supplementary planning documents, national policy could usefully list the sorts of examples of small scale nature interventions that developers should be providing as part of proposals as set out in paragraph 7 of the consultation document such as inclusion of bat and bird boxes, bee and swift bricks and hedgehog highways. In addition, encouragement may be given to incorporation of green roofs and walls and that landscape design both in the garden spaces and in the public realm should enhance existing habitats and link them to new habitats created within the development. Boundaries should be developed to facilitate the movement of wildlife between properties within a development.</p>
38	<p>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?</p>
	<p>Response</p> <p>Agree in principle. However, clarification is sought on how the “availability” of agricultural land used for food production would be assessed as set out in the proposed changes to footnote 67 of the Framework. Is there nationally recognised data on the location / extent of high value farmland?</p>
39	<p>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?</p>

No:	Question and Response
	<p>Response</p> <p>Agree. It is noted that carbon impact assessments are set as a requirement for the London Plan 2021 in Policy SI2 for those planning applications to be referred to the Mayor and positively encouraged in cases where they are not referred. Policy SI2 (F) requires whole life cycle carbon assessments to be submitted. This includes assessing operational and embedded carbon.</p> <p>It is therefore technically feasible to do such assessments and established practice in London. This could be rolled out to the rest of the country with the NPPF giving suitable encouragement. This in our view would need to be Plan led as the purpose of any assessment is to measure the credentials of the proposed development in terms of meeting the objectives, policies and targets in the Local Plan.</p> <p>The Council would support the use of carbon impact assessments. However, It is not felt necessary to apply this to minor development as this would be too onerous and is more relevant to major developments or some suitable higher threshold. It is also suggested that a nationally recognised standard approach for assessing carbon impacts should be rolled out for developers and local authorities to use including recommended software which is easy to use. Such a roll out should be subject to consultation and publicity to assist the development industry to gear up for the process.</p>
40	<p>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>Response</p> <p>Agree, the Framework should have a clearer vision on net zero and the role of local planning authorities and the planning system in achieving the ambitious local net zero targets which many Councils have signed up to. A net zero test could be introduced as part of the examination of local plans. The framework could also provide clarity on when local areas can exceed national standards. For example, the Framework should refer to the Planning and Energy Act 2008 which allows local planning authorities (LPAs) to set energy efficiency standards in their development plans policies that exceed the energy efficiency standards set out in the building regulations. Many authorities have set out ambitious targets for reaching zero carbon and</p>

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	<p>the ability to set more ambitious targets for energy efficiency in new homes is key to this objective and a legitimate local planning matter.</p> <p>The issue of viability of developments may be a constraint on achieving net zero and viability considerations should be reformed through changes to the Framework to ensure that viability assessments encourage sustainable and net zero developments. Current approaches to viability testing focus on the ability of a development to absorb all capital costs within an existing model of sales and land values but assumes no additional long-term value from investment in sustainable buildings. As energy and carbon reduction strategies deliver whole-life value, this can be included within viability assessments.</p>
41	<p>Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?</p>
	<p>Response</p> <p>Yes agree.</p>
42	<p>Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?</p>
	<p>Response</p> <p>Yes agree.</p>
43	<p>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>Response</p>

No:	Question and Response
	<p>Footnote 54 - Agree. The proposed change to include areas as suitable within supplementary planning documents is welcome.</p> <p>Agree - footnote 62 - the proposed change to impacts being appropriately addressed as opposed to “fully” addressed is a very helpful clarification. Similarly the proposed change to community support as opposed to community backing for such proposals is also helpful. However, gauging community support may still be problematic and it is noted that Government is to provide further information on this issue.</p>
44	<p>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>Response</p> <p>Yes agree and fully support paragraph 161. The cross reference to the contents of chapter 16 Conserving and enhancing the historic environment with respect to guidance on heritage areas is welcome and considered important. In this context, Historic England has produced Advice Note 14: Energy Efficient and Traditional Homes; and Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency.</p>
45	<p>Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?</p>
	<p>Response</p> <p>Agreed but it is noted that the policy changes outlined in the consultation are expected to take effect from Spring 2023 but that November 2024 is the earliest date when LPAs with local plans that are more than five years old should begin the new plan making process. We understand that this is because the standard method will be revised based on the 2021 Census which is due to be published in 2024. It is unclear how progress on local plans which become more than five years old by November 2024 would be</p>

No:	Question and Response
	<p>progressed in the meantime under this scenario as some of these may reach the regulation 18 stage before or at this time.</p>
46	<p>Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?</p>
	<p>Response</p> <p>Agreed, the proposed timescales seem reasonable but expect there will be huge demands on the Planning Inspectorate around the proposed submission deadline for examination of June 2025 and adoption by December 2026.</p>
47	<p>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>Response</p> <p>Agreed, we welcome confirmation that 'made' neighbourhood plans prepared under the current system will continue to remain in force under the reformed system until they are replaced.</p>
48	<p>Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?</p>
	<p>Response</p> <p>Disagree in principle with the removal of the power to prepare supplementary planning documents which have proved to be an effective, fast, flexible and well used tool for setting out more detailed policy in a format that can be easily updated. Local authorities including Gedling Borough have made extensive use of these supplementary planning documents and the proposed</p>

No:	Question and Response
	<p>new supplementary plans would be likely to be more onerous to produce and take longer. It is also a concern that the need to examine the proposed new supplementary plans will add resource pressure on the work of PINS.</p> <p>Paragraph 13 of Chapter 9 states that current SPDs will automatically ‘cease to have effect’ at the point at which authorities are required to have a new style plan in place. The status of current SPDs should be clarified. As a document that has previously been consulted on adopted by the Council it should continue to be a material consideration, albeit with less weight than before it expired. There is uncertainty around when current SPDs will expire, being 30 months after councils commence plan preparation as a definition of ‘commence plan preparation’ is needed such as a Council decision to commence work on the plan or the publication of the Regulation 18 stage.</p>
49	<p>Do you agree with the suggested scope and principles for guiding National Development Management Policies?</p>
	<p>Response</p> <p>Agree that National Development Management Policies should have a prominent role when making decisions on planning applications. However these policies should not impinge on local policies that shape development nor direct what land should be allocated. There are potential concerns about how quickly such policies could come into force and how they would be consulted on, potentially trumping local plan policies which have been subject to local consultation.</p>
50	<p>What other principles, if any, do you believe should inform the scope of National Development Management Policies?</p>
	<p>Response</p> <p>Comment - policies need to be drafted in a clear, concise and consistent manner and be of a strategic nature.</p>

No:	Question and Response
51	Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?
	<p>Response</p> <p>Agreed, a policy on carbon reduction in new developments is supported in principle although would need to be subject to viability testing. A national policy on space standards would be supported.</p> <p>We would also support a national policy on the protection of green spaces (including public open spaces and allotments).</p> <p>However, it is not felt necessary to include national policy supporting development in built up areas or supporting housing on brownfield land, space above shops or town centres. Locations for development and crucially how urban areas, town centres are defined in geographical terms are critical matters for local plans. There is potential for disagreement and ambiguity between national policies referring to built-up areas and local policies providing detailed definitions for urban areas, settlements, town and local centres etc.</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>Response</p> <p>Comment - national Development management policies covering Green Belt are a clear candidate for inclusion.</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?

No:	Question and Response
	<p>Response</p> <p>No comment.</p>
54	<p>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>Response</p> <p>Comment - emphasis is put on new housing, supporting housing growth and achieving better quality of design. These are undoubtedly important considerations in levelling up and regeneration. However, levelling up and regeneration requires a focus on sustainable development especially employment opportunities and supporting infrastructure. There is a need for more coordinated action at national and local levels to integrate the various strategies and programmes and the NPPF should emphasise the importance of aligning the policies and programmes of the various stakeholders engaged in levelling up communities. The concept of Combined Authorities is a good example of the type of governance arrangements likely to be more effective in this context. However, the NPPF approach to alignment should encourage stakeholders to align strategies and programmes regardless of local governance arrangements.</p>
55	<p>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>Response</p> <p>Comment - whilst the aim to gently densify urban centres outside the south east is noted through boosting small sites and upward extensions (including mansard roofs), some authorities have limited brownfield land that are suitable for development. For Gedling Borough, the capacity of brownfield sites outside of the Green Belt is only 57 dwellings and the concern is that the emphasis on gentle densification would place undue pressure on other</p>

No:	Question and Response
	<p>uses such as community facilities and open space within the built up area. Consequently, local authorities are generally in the best position to consider applications based on their own individual merits.</p>
56	<p>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>Response</p> <p>Agree, recognise that levelling up has a key social agenda but this should be inclusive for all and not necessary to target specific groups.</p>
57	<p>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>Response</p> <p>Comment - support proposals to separate plan preparation into a new focussed NPPF and for national development management policies to be set out in a separate document.</p>
58	<p>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>Response</p> <p>No comments.</p>